

Submission ID: S72E57027

Please find attached my summary of my Written Representation and my actual Written Representation objecting to East Pye Solar as well as specifically Land Parcel 4 and Cable Route Corridor 4.

FATAL FLAWS SUMMARY - UNDELIVERABILITY

Land Parcel 4 (4A and 4B) is undeliverable in principle.

It is subject to multiple front-loaded, overlapping and mutually reinforcing fatal constraints, including direct conflict with the adopted Long Stratton Neighbourhood Plan, harm to the setting of the Long Stratton Conservation Area and numerous designated heritage assets, location within a barbastelle bat Core Sustenance Zone, severe cumulative effects with major housing growth and infrastructure, loss of Best and Most Versatile agricultural land, and highways safety and glint/glare risks on the A140.

These are not matters capable of mitigation, layout refinement or conditions. They represent structural failures of siting, policy compliance and legal deliverability. Land Parcel 4 cannot lawfully or acceptably form part of the East Pye Solar scheme.

1. Conflict with the adopted Long Stratton Neighbourhood Plan (FATAL)

The Long Stratton Neighbourhood Plan (adopted) forms part of the statutory development plan and places strong emphasis on:

- protecting the historic character and setting of Long Stratton;
- maintaining a clear distinction between the settlement and surrounding countryside;
- safeguarding rural approaches, landscape buffers and key views;
- managing growth through planned housing, not industrial infrastructure.

Land Parcel 4 sits on the immediate settlement edge and functions as a landscape buffer. Large-scale industrial solar development here would fundamentally undermine the Neighbourhood Plan's spatial strategy by urbanising the settlement edge and eroding the transition between town and countryside.

The PEIR fails to assess neighbourhood plan conflict parcel-by-parcel or provide any lawful justification for overriding adopted local policy. This is a structural policy failure.

2. Harm to the setting of the Long Stratton Conservation Area and designated heritage assets (FATAL)

Land Parcel 4 lies within the setting of the Long Stratton Conservation Area and is closely associated with an exceptional concentration of designated heritage assets, including:

- a Grade I listed church (St Michael's, Stratton St Michael);
- a Grade II* listed building (The Old Rectory);
- numerous Grade II listed farmhouses, barns and cottages, some within tens of metres of the site.

The Conservation Area appraisal identifies the importance of:

- open agricultural land along the historic Roman road (A140);
- long views into and out of the settlement;
- legibility of historic development patterns.

Industrial solar infrastructure on both sides of the A140 would cause severe and unavoidable harm to setting, introducing fencing, arrays, lighting and glint/glare into views fundamental to significance. Such harm cannot be mitigated by planting without compounding loss of openness. This represents high-weight designated heritage harm, sufficient on its own to render the parcel unacceptable.

3. European Protected Species – barbastelle bats (Core Sustenance Zone) (FATAL)

Land Parcel 4 lies within a Core Sustenance Zone (CSZ) for barbastelle bats, linking it functionally to confirmed and likely maternity colonies within the wider East Pye landscape. CSZ land is essential for foraging, commuting and maintaining breeding success.

The proposed development would introduce:

- extensive arrays and fencing;
- lighting, CCTV and inverter infrastructure;
- prolonged construction disturbance;
- loss and fragmentation of functionally linked habitat.

On this basis, disturbance or damage to breeding and resting places cannot be excluded, and the works would be likely to require a European Protected Species licence. The application provides no lawful assessment of licence need or grantability, and no evidence that the statutory tests (including maintenance of favourable conservation status at landscape scale) could be met. Given the cumulative CSZ overlap across multiple parcels, this represents a front-loaded legal constraint rendering Land Parcel 4 undeliverable in principle.

4. Failure to assess cumulative effects with Long Stratton growth (FATAL)

Land Parcel 4 must be assessed in combination with major planned and committed growth at Long Stratton, including:

- the new bypass;
- extensive housing development (including ~1,800 dwellings east of the town);
- associated traffic, lighting, drainage and infrastructure demand.

The PEIR fails to assess the in-combination effects of:

- solar infrastructure on Parcel 4;
- large-scale housing growth;
- transport infrastructure;
- other energy schemes in the area.

This omission materially understates harm to settlement setting, heritage assets, landscape character and residential amenity. Parcel 4 represents a tipping-point location, where additional industrial development becomes unacceptable in principle.

5. Landscape character and settlement-edge harm (FATAL)

Land Parcel 4 performs a critical role as open land at the settlement edge and as the principal gateway to Long Stratton on the A140. Development would:

- industrialise the approach to the settlement;
- create a tunnel effect on a major arterial route;
- permanently alter landscape character and sense of arrival.

Claims of reversibility are not credible, particularly given soil damage, drainage alteration and long-term land management change.

6. Best and Most Versatile agricultural land (FATAL)

Both 4A and 4B have a high likelihood of Best and Most Versatile agricultural land, including Grade 2 land. The permanent industrialisation of such land at this scale constitutes an irreversible loss of a nationally important resource, with no robust site-specific soil or ALC evidence to justify it.

7. Highways safety, glint and glare, and access conflict (FATAL)

Land Parcel 4 straddles the A140, a major strategic route. The proposal introduces:

- severe glint and glare risk to road users;
- conflicts with existing congestion and planned highway changes;
- unsafe interactions with public footpaths and local access.
-

These impacts raise road safety concerns, not merely amenity issues, and cannot be reliably mitigated over the lifetime of the development.

Overall conclusion – Land Parcel 4

Land Parcel 4 (4A and 4B) fails on multiple independent and compounding grounds:

- direct conflict with the adopted Long Stratton Neighbourhood Plan;
- severe harm to the setting of the Conservation Area and designated heritage assets;

- European Protected Species licensing failure due to barbastelle CSZ overlap;
- failure to assess cumulative effects with major housing growth;
- unacceptable settlement-edge and gateway harm;
- irreversible loss of Best and Most Versatile agricultural land;
- and highway safety risks on the A140.

These are front-loaded, structural flaws, not matters capable of resolution through mitigation or examination.

Land Parcel 4 is undeliverable in principle.

Its inclusion further reinforces the conclusion that the East Pye Solar scheme is systemically mis-sited and incapable of lawful delivery as a whole.

Objections submitted in response to East Pye Solar
PINS Reference: EN0110014

Land Parcel Sub-site 4A and Sub-Site 4B

Submitted by Lisa Quinn

Relevant Representation reference no: [REDACTED]

As a resident of Long Stratton I have compiled this document with the support of other Long Stratton residents, for Long Stratton, on behalf of Block East Pye Solar and shared with Long Stratton Town Council.

Use of Artificial Intelligence

This Written Representation has been prepared by local residents in response to a Development Consent Order application comprising many thousands of pages of technical reports, Environmental Statement chapters, plans and consultation responses. Given the scale and complexity of the application, **OpenAI's ChatGPT** and **Adobe Acrobat AI Assistant** were used as drafting and document review tools to assist with summarising documents, improving clarity and cross-referencing information. **Any images included within this Written Representation that have been adapted from the Applicant's documents were edited manually by the authors and were not created or modified using artificial intelligence.**

All arguments, conclusions and opinions contained within this Written Representation have been reviewed and approved by the authors, who accept full responsibility for its contents.

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A rainbow over the fields of sub-site 4B highlighting Grade I listed St Michael's Church in the distance



Site 4, nestled between Long Stratton and Tasburgh straddling A140

Executive Summary

FATAL FLAWS SUMMARY - UNDELIVERABILITY

Summary conclusion

Land Parcel 4 (4A and 4B) is **undeliverable in principle**. It is subject to multiple **front-loaded, overlapping and mutually reinforcing fatal constraints**, including direct conflict with the **adopted Long Stratton Neighbourhood Plan**, harm to the **setting of the Long Stratton Conservation Area and numerous designated heritage assets**, location within a **barbastelle bat Core Sustenance Zone**, severe **cumulative effects with major housing growth and infrastructure**, loss of **Best and Most Versatile agricultural land**, and **highways safety and glint/glare risks** on the A140.

These are not matters capable of mitigation, layout refinement or conditions. They represent **structural failures of siting, policy compliance and legal deliverability**. Land Parcel 4 cannot lawfully or acceptably form part of the East Pye Solar scheme.

1. Conflict with the adopted Long Stratton Neighbourhood Plan (FATAL)

The **Long Stratton Neighbourhood Plan (adopted)** forms part of the statutory development plan and places strong emphasis on:

- protecting the **historic character and setting** of Long Stratton;
- maintaining a clear distinction between the settlement and surrounding countryside;
- safeguarding rural approaches, landscape buffers and key views;
- managing growth through planned housing, not industrial infrastructure.

Land Parcel 4 sits on the **immediate settlement edge** and functions as a landscape buffer. Large-scale industrial solar development here would fundamentally undermine the Neighbourhood Plan's spatial strategy by urbanising the settlement edge and eroding the transition between town and countryside.

The PEIR fails to assess neighbourhood plan conflict **parcel-by-parcel** or provide any lawful justification for overriding adopted local policy. This is a **structural policy failure**.

2. Harm to the setting of the Long Stratton Conservation Area and designated heritage assets (FATAL)

Land Parcel 4 lies within the **setting of the Long Stratton Conservation Area** and is closely associated with an exceptional concentration of designated heritage assets, including:

- a **Grade I listed church (St Michael's, Stratton St Michael)**;
- a **Grade II* listed building (The Old Rectory)**;
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The Conservation Area appraisal identifies the importance of:

- open agricultural land along the historic Roman road (A140);
- long views into and out of the settlement;
- legibility of historic development patterns.

Industrial solar infrastructure on both sides of the A140 would cause **severe and unavoidable harm to setting**, introducing fencing, arrays, lighting and glint/glare into views fundamental to significance. Such harm **cannot be mitigated by planting** without compounding loss of openness. This represents **high-weight designated heritage harm**, sufficient on its own to render the parcel unacceptable.

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Land Parcel 4 lies within a **Core Sustenance Zone (CSZ) for barbastelle bats**, linking it functionally to confirmed and likely maternity colonies within the wider East Pye landscape. CSZ land is essential for foraging, commuting and maintaining breeding success.

The proposed development would introduce:

- extensive arrays and fencing;

- lighting, CCTV and inverter infrastructure;
- prolonged construction disturbance;
- loss and fragmentation of functionally linked habitat.

On this basis, **disturbance or damage to breeding and resting places cannot be excluded**, and the works would be **likely to require a European Protected Species licence**. The application provides **no lawful assessment of licence need or grantability**, and no evidence that the statutory tests (including maintenance of favourable conservation status at landscape scale) could be met.

Given the **cumulative CSZ overlap across multiple parcels**, this represents a **front-loaded legal constraint** rendering Land Parcel 4 **undeliverable in principle**.

4. Failure to assess cumulative effects with Long Stratton growth (FATAL)

Land Parcel 4 must be assessed in combination with **major planned and committed growth at Long Stratton**, including:

- the new bypass;
- extensive housing development (including **~1,800 dwellings east of the town**);
- associated traffic, lighting, drainage and infrastructure demand.

The PEIR fails to assess the **in-combination effects** of:

- solar infrastructure on Parcel 4;
- large-scale housing growth;
- transport infrastructure;
- other energy schemes in the area.

This omission materially understates harm to settlement setting, heritage assets, landscape character and residential amenity. Parcel 4 represents a **tipping-point location**, where additional industrial development becomes unacceptable in principle.

5. Landscape character and settlement-edge harm (FATAL)

Land Parcel 4 performs a critical role as **open land at the settlement edge** and as the **principal gateway to Long Stratton** on the A140. Development would:

- industrialise the approach to the settlement;
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Claims of reversibility are not credible, particularly given soil damage, drainage alteration and long-term land management change.

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Both 4A and 4B have a **high likelihood of Best and Most Versatile agricultural land**, including **Grade 2 land**. The permanent industrialisation of such land at this scale constitutes an **irreversible loss of a nationally important resource**, with no robust site-specific soil or ALC evidence to justify it.

7. Highways safety, glint and glare, and access conflict (FATAL)

Land Parcel 4 straddles the **A140**, a major strategic route. The proposal introduces:

- severe **glint and glare risk** to road users;
- conflicts with existing congestion and planned highway changes;
- unsafe interactions with public footpaths and local access.

These impacts raise **road safety concerns**, not merely amenity issues, and cannot be reliably mitigated over the lifetime of the development.

Overall conclusion – Land Parcel 4

Land Parcel 4 (4A and 4B) fails on **multiple independent and compounding grounds**:

- direct conflict with the **adopted Long Stratton Neighbourhood Plan**;
- severe harm to the **setting of the Conservation Area and designated heritage assets**;
- **European Protected Species licensing failure** due to barbastelle CSZ overlap;
- failure to assess **cumulative effects** with major housing growth;
- unacceptable **settlement-edge and gateway harm**;
- irreversible loss of **Best and Most Versatile agricultural land**;
- and **highway safety risks** on the A140.

These are **front-loaded, structural flaws**, not matters capable of resolution through mitigation or examination.

Land Parcel 4 is undeliverable in principle.

Its inclusion further reinforces the conclusion that the East Pye Solar scheme is **systemically mis-sited and incapable of lawful delivery as a whole.**

Chapter 1: Introduction



Long Stratton is a growing settlement in South Norfolk, with approximately 5000 residents yet still maintaining that village feel.

Historically, Long Stratton consisted of two villages; Stratton St. Michael to the north and Stratton St. Mary to the south. **Both are recorded in the Domesday Book** and their Grade I listed churches are of significant heritage. St Mary's is the home to one of only two Sexton Wheels in the country (the other is in Suffolk) and the Sextons Wheel is the format of the village sign.

At the heart of Long Stratton is the Conservation Area, full of heritage, culture and character, that hosts an **abundance of Grade I, Grade II* and Grade II listed buildings** throughout as well further along at Stratton St. Michael whose church dates to medieval times.

From early Medieval times Long Stratton acted as a centre for the surrounding rural area and this remains unchanged today. Buildings surviving from the sixteenth and seventeenth centuries reflect the agricultural prosperity of the area.

Long Stratton is surrounded by open fields which is significant to its elongated shape along the Roman Pye road where **distinction between village and countryside is part of the character of the area.**

Multiple public footpaths and bridleways surround Long Stratton offer escape to residents looking for some peace and quiet as well as wildlife spotting. They also offer connectivity from rural residence to the facilities of Long Stratton, a means of exercise for local walkers, dogs and horses, as well as longer hikes. The waymarked Boudicca Way walking trail runs approximately 36 miles from Norwich to Diss across fields east of the Long Stratton Conservation Area. The Rebellion Way 232 mile circular cycle route around Norfolk, travels through Long Stratton.

An abundance of native and migrating wildlife, including many endangered species, can be found on all the surrounding fields including different species of deer, breeding colonies of bats, owls, hares, badgers and many red-listed birds like skylarks, linnets and greenfinches. Tributaries of the river Tas are within 100m of site 4 which is home to breeding colonies of the endangered white clawed crayfish.

The area is part of the **National Character Area 83, South Norfolk and High Suffolk Claylands** and describes the predominantly flat clay plateau that dominates the area. The plateau is incised by numerous small-scale wooded river valleys like the river Tas, Hempnall



Beck and Starston Beck, some with complex slopes which are surprising for East Anglia. The underlying geology is chalk, which forms the principal aquifer. Rivers are mostly small and slow flowing, often protected chalk streams, contributing to the character of the landscape as well as providing water irrigation and public usage.



The river valleys contain an important mosaic of small-scale pasture, wet heath, reed beds and woodland that provide ecological connectivity into the heart of the Claylands.

Agricultural fields to the east of Long Stratton are a typical example of those within the character of the Claylands. Small in scale, enclosed and surrounded by significant hedgerows and lines of mature trees, like a patchwork quilt.

The marker is the centre of Cable Route 4 and where CRC Compound 2 will be located. The map demonstrates the small enclosed field mosaic, typical of Claylands character

The Long Stratton Neighbourhood Plan 2019-2036 (adopted) approved the re-routing of the busy A140 which once went through the village centre, including the historical Conservation Area. In the summer of 2025, a much anticipated and long-awaited bypass was opened to the east of Long Stratton, allowing for growth, investment and community enhancement to the village, including the development of 1800+ more homes over the next ten years as well as another school, employment area and community space.

With the Town Council's newly created Long Stratton Community Project to bring it all together, **Long Stratton has a statutory development plan that will be threatened by East Pye Solar and its direct conflict of maintaining distinction between town and countryside, safeguarding rural approaches, landscape buffers and clear views;** managing growth through planned housing and not industrialisation.

With Long Stratton also ear marked as a potential location for an additional 1500 homes as part of the Government's housing policy, East Pye Solar will also be in direct conflict with the Government's own policy as there will be nowhere for the additional housing to go. Nor will anyone want to live here as the town will be surrounded and known as a 'solar town'.

Land Parcel 4 encompasses c101 hectares (250 acres) in total, made up of 12 agricultural fields mainly listed as Grade 2 BMV; growing various cereals like wheat and barley as well as miscanthus (a sustainable and renewable biomass energy crop), and oilseed rape. It is divided

into two sub-plots, 4A and 4B and if consented will incorporate a 132kV substation on sub-site 4B plus a construction and haulage holding compound on sub-site 4A.

Site 4 is sited at the northern gateway to Long Stratton and straddles the A140 Ipswich Road; the main route from Cromer to Norwich and on to Ipswich.

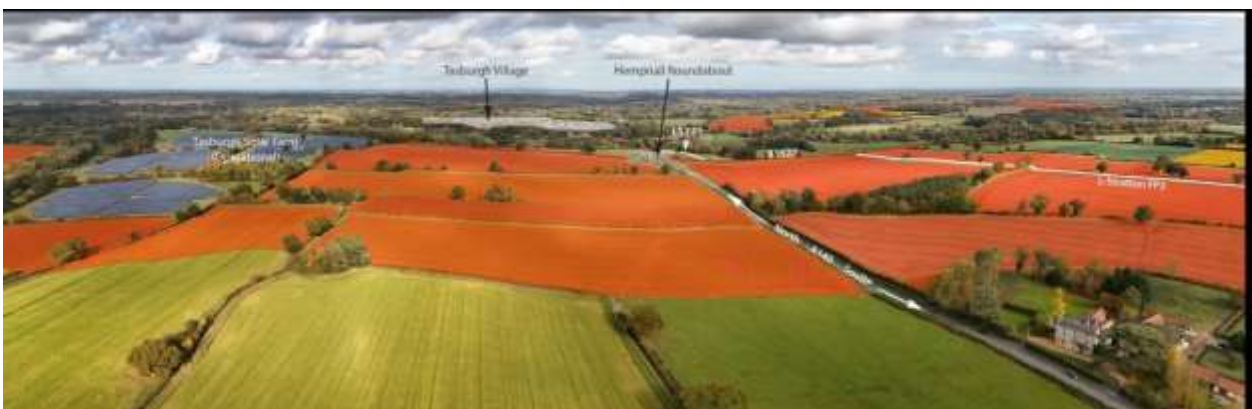
The A140 is a straight Roman Road and a main arterial 'gateway' to the Norfolk Broads National Park, Britain's largest protected wetland.

Site 4 sits on the corner fields, on both sides of the A140, butting up to the very busy '4 exit' Hempnall roundabout, created in 2019 to alleviate the accident hotspot of the previous crossroads. The roundabout serves over 20,000 vehicles daily.

The fields proposed for Site 4 are on the immediate edge of Long Stratton and acts as the landscape buffer; the transition between town and countryside. They are within a couple of hundred metres of the Conservation Area as well as surrounded by many heritage and listed buildings.



Site 4 land looking north without the proposed



Site 4 in orange showing proximity to A140, Hempnall Roundabout, Hall Farm Solar and Tasburgh village



Site 4 in relation to Long Stratton and Conservation Area

East Pye Solar would force everyone to pass through a **tunnel of solar panels** on both sides of this major route. They would tower over them and dwarf their vehicles. **Glint and glare** as well as distraction will be a real issue. That, combined with the southern gateway at Site 2C, and the overall cumulative industrialised impact of the scheme, would make Long Stratton and the surrounding area a very unattractive place to visit or live where people would just pass by and local businesses left to suffer.

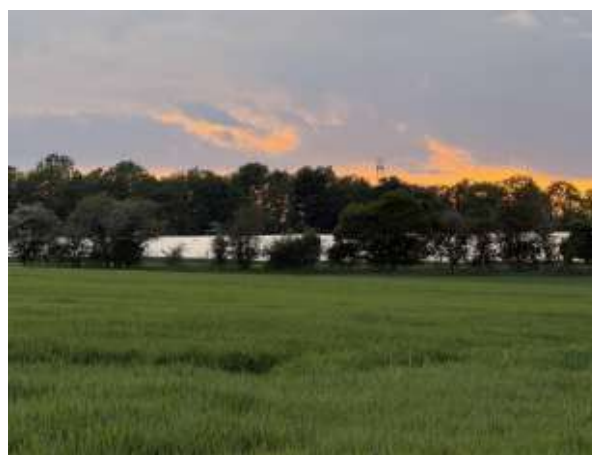
Industrialising the approach to a settlement, removing that sense of arrival, not just to Long Stratton but actually to Norfolk in general, changes the whole character of an area and is a FATAL flaw.

As the A140 goes, more or less, from North to South, **glint and glare** east to west from the tracking panels will be a real problem on all approaches to and from the busy Hempnall roundabout, as panels will directly face all routes at some time during the day, increasing road safety risks as well as impacting on local residential homes.

Site 4A shares a western boundary with an existing 15MW solar field at Hall Farm. Glint and glare from the south facing fixed panels can be seen on sunny days along the B1527, especially when trees aren't in leaf, and the site can be seen even on dull and misty days from over 1km away.



Hall Farm in the distance over 1km away, January 2026, misty and raining



Hall Farm at approx 8.20pm cloudy with low breaking sun. The images don't truly show how bright and reflective the panels were due to low light whilst taking the photo.

Sub-plot 4A is edged at the northern boundary by the Bungay Road, a C-road towards Tharston and Wymondham to the west; whilst 4B meets the B1527 Hempnall Road at its northern

boundary, a busy connecting route to Hempnall in the east and on to Bungay. Site 5 is a few hundred metres along the B1527 from site 4 and has a boundary to this busy route.

Site 4 also sits within 100m of the start of the new Long Stratton by-pass and not only **conflicts with the road changes at the Hempnall roundabout but also conflicts with the congestion management and planned highway changes for the A140, Long Stratton and the new planned housing east and west of the village.**

Cable Route Corridor 4 links Site 5 to Site 4, then goes on to join the northern part of the scheme to the southern cluster at Site 2C. It is approximately 8km long and, in addition to the solar sites, will remove hedgerows, close footpaths/bridleways and permanently alter the character of the Clayland landscape forever.

Site 4 of the East Pye Solar proposal should not go ahead because:

- Harm to the setting of Long Stratton;
- Inappropriate vast scale;
- Directly adjoining the boundary of a Conservation Village;
- In direct conflict to the Long Stratton Neighbourhood Plan;
- Proposed site shares boundary with multiple Historic England 16th and 17th century Grade I, Grade II* and Grade II listed properties including the Grade I listed Church of St Michael place of worship;
- All listed and nearby properties at present have uninterrupted views across open fields;
- Approach to the busy roundabout on all routes offers clear views and openness which would change to blocked views and a feeling of enclosure;
- The Scheme will change the landscape from agricultural to industrial;
- Screening will not be adequate to hide the proposed from view, given its scale and redundant when trees are without leaf. Whilst screening will also change the character of the landscape from open views to enclosed landscape;
- Glint and Glare to traffic on surrounding roads as well as to those living, walking, horse riding, cycling in the area;
- No thought has been given to properties with two or more floors where views are extensive whilst glint and glare will be significant;
- 250 acres of mainly Grade 2 BMV agricultural land will be removed from food production;
- Significant impact on wildlife including numerous endangered species;
- Boundary to existing solar field which already offers glint and glare;
- Risk of increased flooding to surrounding roads and nearby homes due to undulation topography of planned fields and run off;
- Parts of Site in a Flood Risk Zone 3;
- Risk of contamination to nearby river Tas from runoff;
- Risk of contamination to nearby private water sources due to runoff;
- Destruction of the significant character of the Claylands landscape.

East Pye Solar is about making the landscape fit the Scheme and not the Scheme fit the landscape.

Chapter 2: Environmental Impact Assessment Methodology and Flaws

East Pye Solar state in their Site Selection Assessment document APP/7.20, when considering the site selection process, they had several constraints and preferences:

- **Utilise** previously developed land, brownfield land, contaminated land, or industrial land;
- **Avoid** agricultural land or if unavoidable to use land that is not classified as BMV (1,2,3a) so looking at land that is Grade 3b, 4 and 5;
- **Avoid** land in Flood Zone 2 and 3;
- **Avoid** land near to or designated as Site of Special Scientific Importance (SSSI) as well as ancient and non-ancient woodland;
- **Avoid** any Scheduled Monuments, Registered Battlefields, dense concentration of listed buildings and Conservation Areas;
- **Avoid** areas to the proximity of nearby sensitive human receptors (high sensitivity) which include residential dwellings, populated areas and villages.

What they have done:

- **No land** is brownfield, previously developed, contaminated or industrial;
- **~80% of solar sites are BMV grade 1-3a including Site 4 which is a mixture of BMV Grade 2 and 3a;**
- Some of Site 4 is in **Flood zone 3 with the rest in Flood Zone 2 (magic map);**
- The majority of **site 4 is designated Medium to High groundwater flooding** and with some of **Site 4A in High Priority Flood Risk Management in sections;**
- The whole area is part of **Natural England's National Character Area 83, South Norfolk and High Suffolk Claylands** with 25 years planned restoration and regeneration in place;
- Cable Route Corridor (CRC) 4 passes through the Claylands, significant to regeneration of character and wildlife protection, as well as adjacent to **several ancient and non-ancient woodland** areas including Wood Green and Tyrell's Wood (Woodland Trust).
- Rackman's Wood is on Site 4B created in memory of Leslie John Rackman (1909-2001) with an unofficial footpath to visit the woodland;
- Site 4 sits on the boundary of Long Stratton with its **Conservation Area** within a few hundred metres;

- Transport route for CRC4 butts up against, and includes the start of the Conservation Area at Hall Lane, including The Cottage, Hall Lane Corner, a listed residence being named in the Book of Reference Part 1;
- Long Stratton is an area of **dense concentration of listed buildings** and Site 4 is surrounded by listed buildings Grade I, Grade II* and Grade II;
- Long Stratton is an area of **high sensitivity human receptors (EPS docs)** including residential dwellings, a high listed heritage area and supported by an adopted neighbourhood expansion plan in place.

In fact the cumulative scheme is near, around or adjacent to multiple villages, near dwellings and multiple listed buildings, ancient woodland, SSSI and Conservation areas.

This alone demonstrates the proposed scheme is too big and in the wrong place. That cannot be mitigated against.

The scheme is driven by willing landowner sites only which isn't a good enough reason to remove BMV from production nor decimate and change the character of the area forever.

Soil and Agriculture

With ~80% of the solar sites being BMV Grade 1-3a and no soil surveys have been taken on the CRC but assumed to also be BMV1-3a (EPS docs), justification of using BMV under National Planning Policy Framework (NPPF) should be made.

The scheme is landowner driven rather than scheme driven.

Within the **Botley West DCO** review, the Secretary of State (SOS) requests '*to secure the restoration of BMVL to at least their pre-construction agricultural land classification grade upon decommissioning. Appropriate monitoring to aid the soil restoration should also be outlined in the Soil Management Plan.*

The SOS requested justification as to the siting of the scheme on BMVL and how the alternatives or avoiding BMVL altogether have been considered during site selection.'

East Pye Solar have not justified the use of BMV at all and in particular land categorised as BMV 1-3a.

The same requirements for Botley West should be applied to East Pye Solar who have actively sought agricultural land instead of alternatives.

If suitable alternatives couldn't be found, shouldn't the scheme in this area be considered too big and the wrong place?

Long Stratton Neighbourhood Plan (LSNP) and By-Pass

- No consideration has been given to the conflict between the adopted LSNP and the effects on industrialisation of the area, including the approach to the settlement of Long Stratton;
- Maps across the DCO are inconsistent. Many maps within the DCO, including those within the transport documents, do not include the Long Stratton by-pass as though it doesn't exist. Or is it because the information was created before the construction was finished and not reviewed since? Exclusion shows the information as confusing, incorrect and conflicting;
- Transport and access have been assessed by desktop and not in person;
- The by-pass and road changes aren't included on desk top maps when the documents were created;
- No surveys, prior to DCO being submitted, have included the by-pass impact including the traffic volume or road use projections with the increased housing plan;
- The DCO shows the A140 as a major construction transport route with the by-pass being the main route to and from sites to the south of the Hempnall Roundabout as well as cable route corridors (CRC) connecting the southern cluster of sites;
- Due to limited or no surveys taken place by East Pye Solar, the reliance on the A140 South - B1527 (link 3) requires **further assessment as the route exceeds IEMA EATM guideline thresholds of more than 10% and is HIGH Sensitivity**;
- Traffic monitoring tubes were not carried out until May 2026 for Hall Lane, Ipswich Road (south of Hall Lane) and Ipswich Road (Long Stratton in the Conservation Area).

Access and Transport

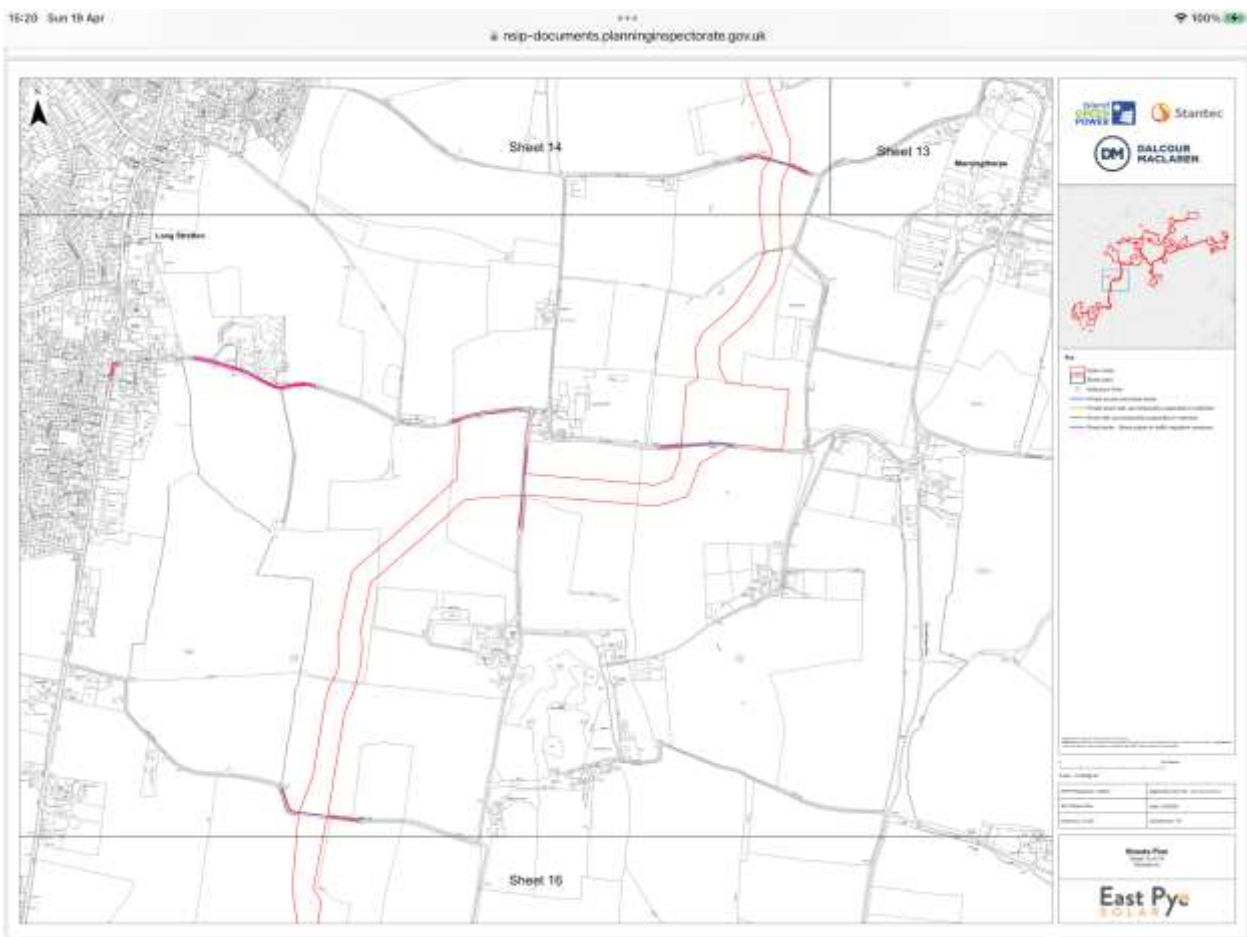
Some transport surveys were carried out in April - May 2025, others 'in September' as a neutral month although a key tourist time for Norfolk (although the year wasn't stipulated), and neither have been updated after the Long Stratton by-pass was completed. Another survey, in places, was in November.

- Access/transport routes assessed by desktop;
- **The A140 south - B1527 requires further assessment as the cumulative schemes accessing Sites 2A, 2B, 2C, CRC3 and CRC4 exceeds the IEMA EATM guideline thresholds of more than 10% flow increase on links with receptors of High Sensitivity.**

- As the A140 is a major haul road and the main access route to most of the scheme this is a major flaw and demonstrates lack of in-depth transport surveys were taken.
- Different transport studies were taken with different results making understanding of the results challenging at best and generally incomprehensible and skewed;
- Knowing the roads in question, the results are highly questionable as the single-track lanes aren't suitable for HGVs and highway signs often state as such when diversions are in place, but will serve a delivery van and farm traffic;
- **HGV count includes vehicles over 3.5 tonne**, fabricating the results as these will include delivery vans, work vans, Supermarket vans, ambulances, flatbed trucks, horseboxes, farming vehicles, buses, minibuses, motorhomes, towed caravans to name a few;
- **Access to Site 4A at A19 will be via a newly created 5th exit off the A140** 4-exit Hempnall roundabout that serves over 20,000 vehicles a day;
- Built in 2019 due to the junction being an **accident 'hot spot'**, it is a major haul route on the A140 north to south as well as east to west as a connecting route to market towns;
- Norfolk County Council refused access to Sites from A-roads yet this access point is not just from an A-road but also a **major junction on the A140**;
- **A19 accesses a major construction Compound as well as haulage holding site for 7A-7F** which will cause further congestion at the roundabout and wasn't consulted on;
- With Hall Lane, Parker's Lane and Edges Lane as well as many other local lanes closed with the by-pass construction, all residents east of Long Stratton had to use B1527 Hempnall Road (west of The Street, Fritton/the Krons crossroads to the Hempnall roundabout) making the figures for B1527 higher than normal. As no further surveys have taken place since the by-pass opened and the traffic numbers have reduced, these normal figures haven't been considered when analysing the traffic increase outcomes and as a result has reduced the vehicle percentage increase for B1527. Add that to the fabricated HGV figures due to including vehicles over 3.5 tonnes and the transport surveys are purely mythical;
- Many local lanes haven't fully opened nor connect to the by-pass, including Parker's Lane and Edges Lane, which haven't been surveyed since the by-pass opened meaning new road layouts and traffic flows haven't been considered in relation to impact from the development if consented;
- Many lanes and access points haven't been surveyed including the junction with Brick Kiln Lane and B1527;
- Visibility splay at access points cannot be achieved without removing significant habitat like wooded areas and hedgerows;
- **Many maps on the EPS documents are incorrect** as they **exclude the Long Stratton by-pass and changes to local road networks**, including the Streets Plan dated 3/4/2026 (see image below);

- Construction maps and plans for the by-pass showing the new bridge at Hall Lane date back to early 2024;
- The proposed AIL access via Hall Lane is inappropriate and unacceptable. Document maps show Hall Lane as the previous straight(ish) lane and although a single-track lane was at 60mph. This is incorrect as the lane is now 30 mph going to 40mph, contains an S-bend approaching a bridge of 44tn weight limit and blind corners. **Hall Lane should be visited as part of the site visits;**
- **The by-pass plans were revised prior to construction, removing a roundabout at Hall Lane and putting in an over bridge instead. This was because Norfolk County Council highways and the DfT considered that the Hall Lane/A140/Ipswich Road junction was not suitable to receive heavy traffic off the by-pass due to the constraints of the junction and the listed buildings in the vicinity. There is not enough vision splay to the north and this could not be delivered without damaging the listed buildings adjacent including the setting of Grade I listed church of St Mary's;**
- This is a **Fatal Flaw** to this targeted access and transport route which would have been acknowledged if 'in-person' surveys had been taken (see images);
- There is an **insufficient turning circle** to safely support vehicles manoeuvring the corner at Hall Lane and Ipswich Road, left or right, with near misses regularly happening with the daily mill lorries when using the junction as they have to swing wide to turn;
- East Pye Solar Section 56 and targeted consultation documents (October 2025) show the junction of Ipswich Road and Hall Lane as part of their plan for Highway Works of 0.04 hectares (405 sq meters). This includes the grass verge outside Purbeck, Ipswich Road as well as the pavement on the corner with the Conservation Area outside the Corner Cottage (Grade II listed);
- Targeted consultation (October 2025) shows Hall Lane to be **widened at TM1995692177 by 0.18 hectares (1812 sq meters)**. This is at the avenue of 20 horse chestnut trees. These trees separate the residential area from the countryside and are a significant wildlife habitat. The only way to widen the road at this point is to remove the trees which are on private property (image below);
- Hall Lane isn't wide enough or of suitable construction to support an AIL and has already been resurfaced due to subsidence from the mill lorries;
- Cable Route 4 and CRC compound 2 access is from Hall Lane, a small narrow lane, that requires HGV and AIL to travel over the by-pass **bridge built to national standard with weight limit of 44Tn (AIL weight is 78Tn);**
- **East Pye Solar documents state they are unaware of the weight limit of the bridge (although it being public knowledge) yet proposed Hall Lane as a major haul route;**
- Hall Lane is **described in the documents with incorrect road layout and speed limits**, as it was prior to the construction of the bypass, with the road layout changed from straight lane to one that twists and turns and with a bridge built to national standard;

- Hall Lane is described as 60mph and although single track has room for two-way traffic. This is **incorrect** as Hall Lane is now 40mph, and has limited passing points apart from on the bridge where two cars only can pass;
- Hall Lane is a maximum of 4m wide (excluding the bridge) whilst the AIL width is 4.5m wide;
- A 7.5m wide CRC haul road is planned for HGV traffic across CRC4 **without consultation** even though by-pass plans show no access to CRC4 from any lanes between Church Lane and Wood Lane, apart from over the bridge at Hall Lane which is unsuitable;
- **A receiving compound will be constructed in Hall Lane at the junction of Parker's Lane which has not been part of the targeted consultation nor is it labelled as such yet will be the same size and construction as the official ones.**



East Pye Solar Street Plan APP/2.6 showing Long Stratton by-pass is missing and previous access to CRC4 still in place



Long Stratton by-pass map (May 2024) showing vehicle bridge and no connection to existing lanes like Edges Lane and Parker's Lane to the east



Section 56 notices in Hall Lane, Long Stratton. Purbeck, Ipswich Road is a private home and was found on a post with other notices 500m away. The owner was unaware.



Images show the top of Hall Lane with Ipswich Road, Long Stratton which is the start of the Conservation Area. This is the AIL route to CRC4



Avenue of 20 horse chestnuts in Hall Lane earmarked for removal or lopping



Eastbound approach towards bypass bridge, Hall Lane



Hall Lane, Eastbound approach to bypass bridge looking west



Hall Lane, eastbound approach to bypass bridge looking east



Images of Hall Lane bypass bridge showing new changed road layout which is also planned for Highway works shown in section 56 notices



Exiting east from the bypass bridge, Hall Lane with the narrowing and blind corner at Reeves Cottage



Hall Lane where the unofficial AIL compound is planned

Cable Route Corridor Surveys

In December 2025, during the meeting with the Planning Inspectorate, and documented on 5th February 2026, East Pye Solar was advised to consider undertaking Agricultural Land Surveys (ALS) on the cable route corridor (CRC) referencing ‘Oaklands Farm Solar Park’ whereby Natural England raised concerns about the assumptions on land quality in that case and requested an ALS survey to be undertaken on the CRC during the examination.

The Inspectorate also advised the applicant to ensure relevant surveys were completed in time.

No surveys have been carried out on the Cable Route Corridor (CRC) for ALS.

In fact, throughout the documents the Applicant still refers to **the need for ‘detailed design’ at a later stage** when discussing the CRC. How can anyone assess what to expect if it is still unclear of the detailed design as it hasn’t been finalised and surveys not undertaken?

So much of the CRC is incomplete as the land, access and route hasn’t been surveyed and there are multiple inaccuracies including the nearest properties.

For CRC4, the documents state the nearest properties are Wood Lane (160m), Parker's Lane (390m) and Mill Road (240m)

When the reality is, from the curtilage of the property boundary:

- Reeves Cottage ~55m
- 1 Mill Cottage ~55m (west and south)
- 2 Mill Cottage ~55m (west and south)
- Wood Green Farm North <100m (west and north)
- Cowslip Barn 1 < 100m
- Cowslip Barn 2 < 100m
- Maple Tree Barn <100m
- The Chalet <100m
- Wood Green Farm South <100m
- Happy Meadow <100m
- Mayfield Farm Barns ~100m (west and north)
- Mayfield Farm Cottage ~100m (west and north)
- Mayfield Annex ~100m (west and north)
- Mayfield Farm ~100m (west and north)
- The Mill House <100m (east and south)
- The Mill <100m (east and south)
- Greenwood Cottage ~160m (east and north)
- 4 New Cottages ~ 400m
- Three Ways ~c350m
- The Hollies ~100 (east and west)
- Crowgreen Farm House ~150m
- Wood Farm Barn ~160m (east and west)
- Wood Farm House ~160 (east and west)
- Oak View ~300m
- Goodies Food Hall ~200m
- Parish Farm ~150m
- Walnut Farm ~150m
- Stable Cottage ~150m
- The Cottage ~150m
- Frenchs Farm ~50m
- Athena Pilates ~350m
- The Oaks ~350m
- The Pulham Patch ~50m - the haul road will go directly through this Business
- Ashleigh Farm ~200m
- Crossways House ~200m

All these properties will have a direct impact from CRC4 whether it's the view, the haul road or the three compounds, and where multiple properties and businesses will experience delay, road closures, noise, dirt and even risk of flooding from the CRC4.



This is the side garden of The Chalet at Parker's Lane, Wood Green. The Cable Route Corridor and haul road will run immediately behind the boundary of the garden and Parker's Lane will be closed at times yet is the only route from Wood Green.

In addition to the impact on properties, as no surveys have been carried out on the CRC, **the impact to PRow and Bridleways will equally be significant and have not been considered.**

There are **approximately 16 PRow within the CRC4 alone** and these are used not just by people walking for recreation but also by local residents, including school children, accessing the facilities of Long Stratton and the local transport routes to Norwich for work, college and recreation, or south to Harleston and Diss.

Closing the PRow will cause untold stress and inconvenience, as it did during the construction of the bypass, forcing people to cycle or walk many miles out of the way to reach destinations. Or of course use a car instead. One man who cycles from Hardwick daily to visit his mum in a care home in Long Stratton added 10 miles to his journey each way.

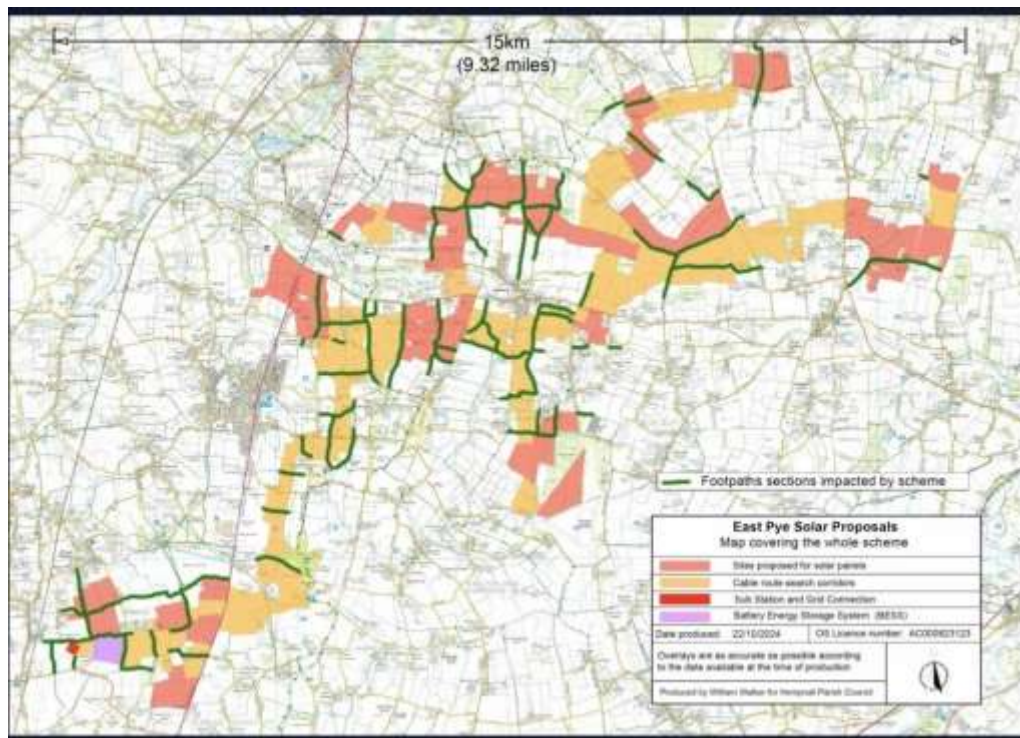


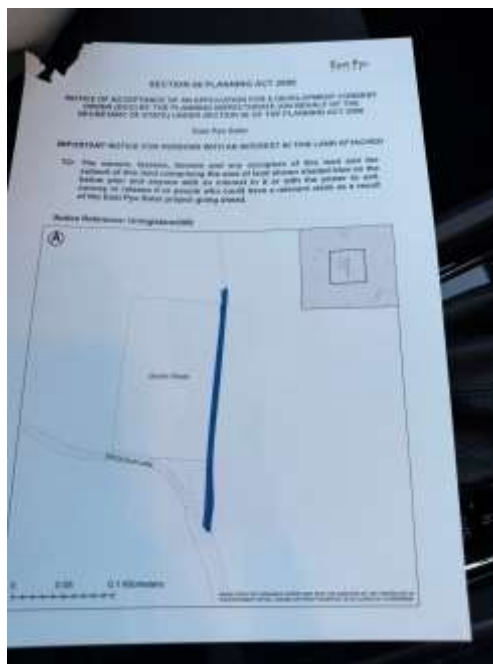
Image shows the PRow across the Scheme

Unregistered / Unknown Land Ownership and Book of Reference

- Section 56 notices were issued during 2025, and letters were sent to multiple residents asking about financial information causing worry, fear and stress including the elderly;
- Section 56 notices then began to appear again across the scheme from early May, a week after the Planning Inspectorate registration opened and up until early June, less than 10 days before the close of Planning Inspectorate registration;
- Many notices were posted several miles away from the relevant area and included up to 20 notices at a time;
- At least two homes were listed on posts under section 56 as 'unregistered' and considerable distance from the residence so and owners were unaware;
- Ivy Cottage, Hempsall was listed on a post 3 miles away and the owners were notified by friends;
- The homes, as well as many others, are listed within the Book of Reference yet the owners were unaware;
- Martin Jenkins, the owner of Purbeck, Long Stratton has submitted his opinion on the Relevant Representation after being told by 'a neighbour' (myself) that his home and garden was listed on a post 500m from his home, down Hall Lane and not where he would have naturally gone;

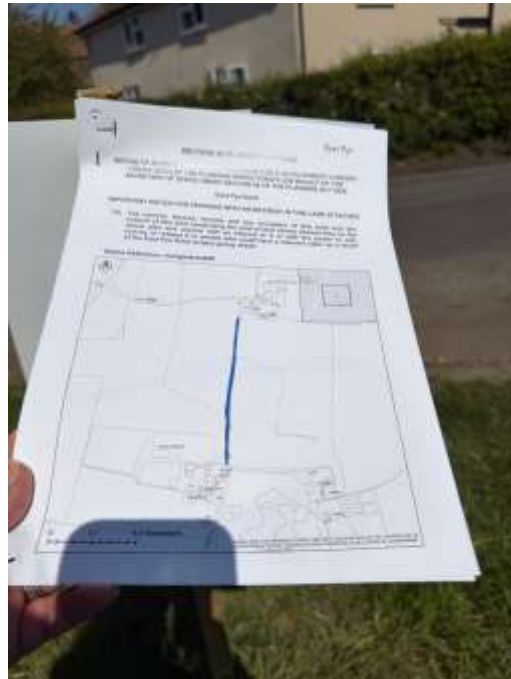
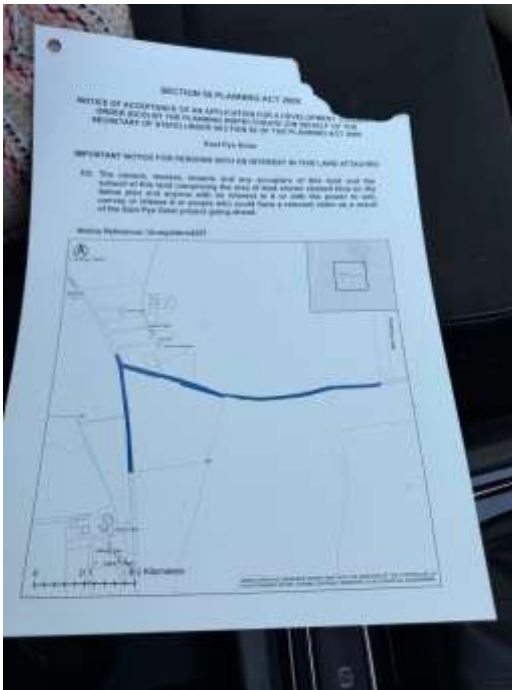


This plot was not part of the consultation or DCO and this plot could be anywhere



This plot was not part of the consultation nor is the DCO whilst this is considerably larger than the DCO docs

within



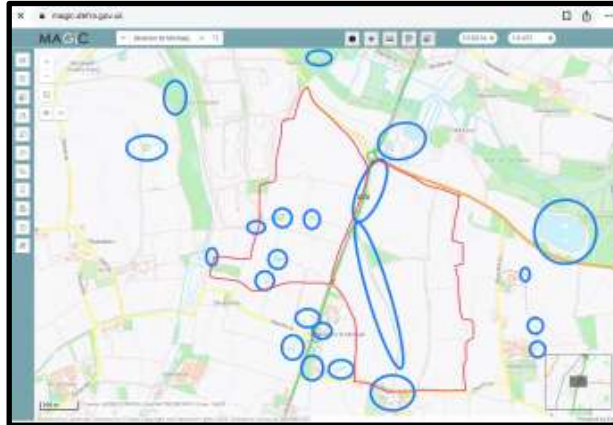
These Plots are larger than DCO: Wood Lane and Parker's Lane



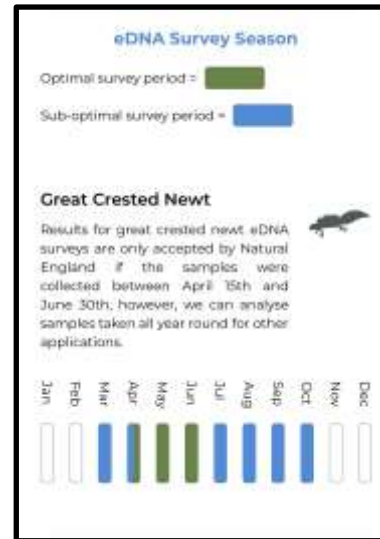
This plot could be anywhere however I know where this is (Mill Road, Long Stratton) and it is larger than the DCO

Great Crested Newts (GCN)

- **Natural England** will only accept survey results carried out within the optimum survey period between **mid-April to the end of June**;
- **From Natural England**, 'a survey for Great Crested Newts should be conducted where there's a suitable water body such as a pond or ditch within **500 metres** (m) of the development, even if it only holds water for some of the year' Gov.uk;
- Great Crested Newts have been located on multiple ponds and water areas on sub-site 4B and across CRC4 based on data records since 2006 up and until 2023 EPS Environmental Study Vol3; App 8.3 March 2026;
- East Pye Solar stated Surveys were to be carried out June 2024 and June 2025 on other ponds and water areas on sites;
- Further surveys were carried out on a 250m buffer zone and are dated towards the end of June (at the end of the optimum survey time) also into July, August and September;
- GCN were found to be on ponds and water areas within site 4A and 4B and within the 250m buffer zone of both sub-sites of 4;
- No surveys were carried out on ponds on CRC4 as ponds were not present on the online mapping and only discovered during CRC extended habitat surveys undertaken in late 2025 and therefore status is unknown but precautionary assumption is made. There are GCN on most ponds across the CRC4;
- Some results were 'precautionary positive' due to no access or ponds were dry. Surveys on fields during key harvest times and during summer months, especially in June 2025 when the county had been in drought for months, is no surprise;
- Many local ponds have not been surveyed for Great Crested Newts by which there are breeding colonies;
- Resident of the Tumbrel Barn, Norwich Road was written to by East Pye Solar however no surveys were carried out. **Great Crested Newts are present in the pond and is located within 100m of Site 4**;
- A Great Crested Newt has been located foraging in the garden at Mayfield Farm Cottage within 200m of Cable Route Corridor 4 and 100m away from the large natural pond within the property boundary which isn't acknowledged within the DCO documents;
- **Many natural habitats will be removed or disturbed, like significant hedgerows and foraging habitat, during construction**;
- The GCN population is considered important at a local level;
- Absence of a record labelled as 'inconclusive' does not mean there are no Great Crested Newts. It could mean there is no survey data available for that location or data could not be gained;
- In addition to the water ponds and streams circled below there are all the water courses and tributaries of the river Tas within close proximity;



Map shows water areas in the immediate vicinity to Site 4A and B



Taken from SureScreen Scientifics

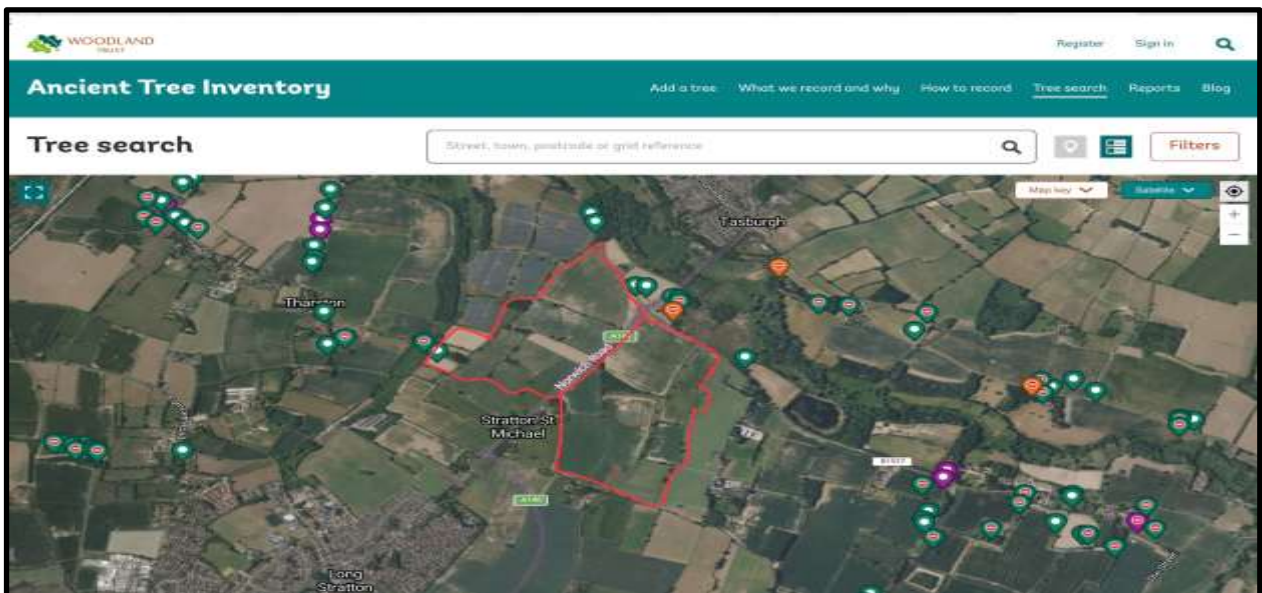


Found in the garden of Mayfield Farm Cottage <200m from CRC4 and 100m from a large natural pond unlisted on Docs

Bats

Site 4A and 4B have areas of woodland that are contained within the scheme as well as surrounded by many areas of woodland and habitat favoured by bats.

Trees considered 'veteran' and 'ancient' by the Woodland Trust, with TPO's issued on many of them, are a perfect habitat for bats.



Ancient and Veteran trees in the immediate vicinity to Site 4A and B, perfect habitat for bats and excludes additional trees and woodland in and around the site.

Bats are regularly sited around site 4 and clearly have an established habitat as seen in both EPS images below.



Maps of site 4 show the vast areas for bats to roost

As part of the conversion of The Dairy, within the curtilage of The Cedar's, a Bat and Owl Survey were included with bats present. This is within 100m of both Site 4A and Site 4B and these fields will be their natural foraging and hunting ground.

These colonies are in addition to the maternity colonies of Barbastelle Bats identified across the site. The Barbastelle Bat is an Annex II species under the Habitats Directive and is classed as vulnerable in the UK. Whilst rare, East Anglia is a known stronghold for the species nationally,

particularly Norfolk. As a result, it has been identified as one the **core areas suitable for the implementation of the Species Recovery Programme (Harris 2020).**

All bat species are legally protected in the UK as European Protected Species (EPS) in the Habitats Directive and under The Conservation of Habitats and Species Regulations 2017 and prohibits to impair their ability:

- To survive, breed, or reproduce; or to rear or nurture young;
- to hibernate or migrate;
- to affect significantly the local distribution or abundance of species;
- damage or destruction of a breeding site or resting place.

The Wildlife and Countryside Act 1981 states it is illegal to intentionally or recklessly disturb bats whilst in their place of shelter, or obstructing their access to shelter or protection.

A licence from Natural England is required and should not be issued for East Pye Solar to carry out their development as it does not meet the requirements.

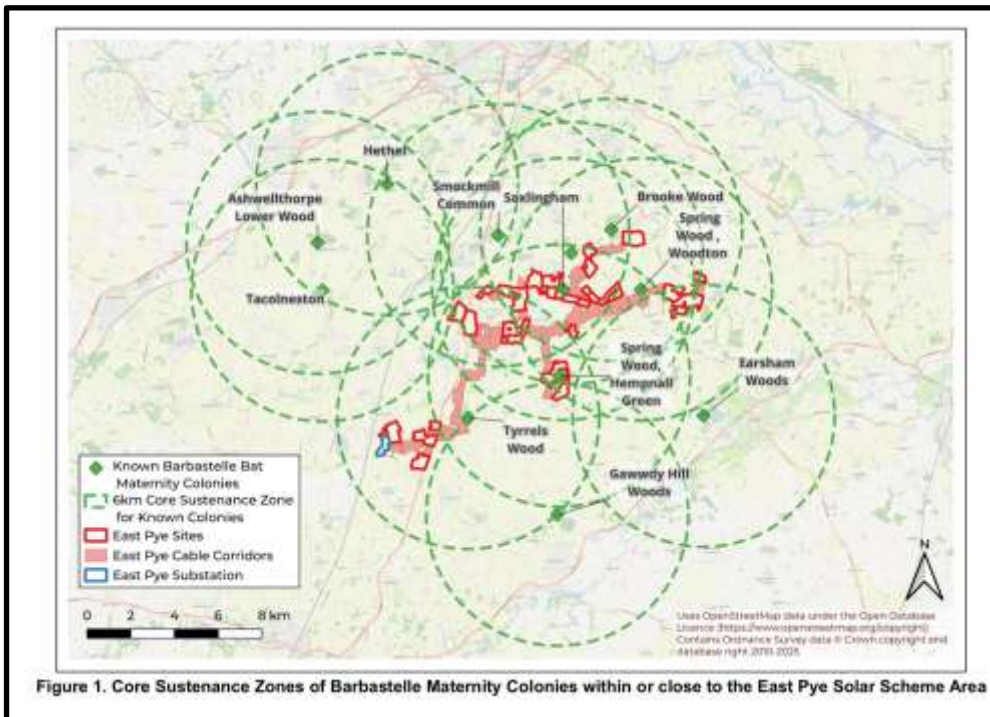
East Pye Solar should not be issued permission to develop without the licence as it is undeliverable.

In addition to Site 4, the length of Cable Route Corridor 4 (CRC), which is approximately 8km long, hosts multiple bat colonies along the route with small, established privately owned and undisturbed wooded areas, significant hedgerows and mature trees, in particular oak trees.

The CRC passes adjacent to the hamlet of Wood Green and its Common, a protected space with an abundance of varying wildlife habitat, including reedbeds, marsh and grassland as well as mature woodland and ponds. Bats are in abundance here.

The CRC runs to the immediate west of and adjacent to Tyrrel's Wood (documents list as Great Wood) within less than 100m of its boundary. The Wood is managed by the Woodland Trust, with an ancient woodland site in the centre named Boscus de Grischave and with records dating back to 1251.

Tyrrel's Wood is the site of a large Barbestrelle maternity colony and is supported by significant foraging area of hedgerows and trees within the CRC, some planned for removal for the 50m wide CRC and 7.5m wide haul road that will carve up this part of the Claylands.



The Hempenall Beck which forms part of the river Tas tributaries also dissects Tyrrel's Wood and CRC4.

Although EPS recognise only one tree requiring further assessment on the CRC via their desk top study, they have **FAILED to acknowledge the surrounding landscape of CRC4 especially Wood Green and Tyrrel's Wood. This is a serious flaw in the Applicants assessment especially as the CRC will be adjacent to both of these significant locations and the impact to the maternity colonies in these locations will be detrimental and cannot be mitigated against.**



Image above shows the cabling route going less than 100m of Tyrrels Wood

Badgers

An active badger sett has recently been identified within woodland in Site 4.

Evidence of current use includes tracks traced from a dead badger found on the A140 back to the sett.

The woodland is proposed to be surrounded by solar panels including fencing and lies beside two main construction haul routes.

The submitted badger information is redacted, so affected parties cannot determine whether this active sett has been identified, classified or assessed. This creates a serious uncertainty in the ecological baseline and in the assessment of construction disturbance, severance of foraging/commuting routes, collision risk, lighting, vibration, trench hazards and potential sett interference.

The Applicant should be required to confirm confidentially to the Examining Authority, Natural England and the relevant authority ecologists whether this sett is included in the ES badger survey; whether it is a main, annex, subsidiary or outlier sett; what activity level has been recorded; what buffer distances are proposed from haul routes, fencing, panels, trenches, lighting and construction compounds; whether any works would require a Natural England licence; and where those measures are secured in the DCO requirements and certified documents.

Given that the sett lies in a woodland also associated with barbastrelle Core Sustenance Zone habitat and within a hydrologically connected landscape draining towards the River Tas plus a breeding ground for skylarks, this cannot be treated as a minor isolated constraint.

It is further evidence that Site 4 forms part of a connected ecological network whose disturbance, fragmentation and cumulative effects have not been adequately fixed or assessed.

Seasonal Surveys and Ground Nesting Birds

East Pye Solar have failed to survey the fields for **Lapwings**, **Skylarks** and **Turtle Doves** as well as seasonal surveys for other wildlife which are protected and have relied upon desk top studies.

Absence of data doesn't mean absence.

Skylarks: are present on every field across the scheme and thriving due to protections in place and how the land is being managed. Skylarks will be highly impacted by mass removal of important habitat.

Two years of construction disturbance including the permanent removal of nesting sites for **Skylarks** within the solar sites and the removal of nesting sites, even if temporary for the two

years of construction on the CRC, will have a serious impact to numbers, which can't be mitigated against.

Removing 250 acres of arable land on Site 4 and adding a few acres of meadow at Site 4B is a gesture not an answer especially when the cumulative loss habitat is considerable.

In fact, including a small area surely acknowledges the importance of Site 4 as a significant habitat area for ground nesting birds.

Incorporating 12.5 hectares (30 acres) on four sites (3, 4B, 8B and 10B) is an exercise in adding biodiversity net gain even though the removal of habitat is considerably more and can only have a negative impact on numbers.

The Applicant's survey identified 81 nesting sites across the order limits and concluded that the Skylarks within the order limits represent <1% of county populations. Accordingly, this number was viewed as 'unlikely to be considered significant in the national and county context'.

However, with the cumulation of schemes across the region, particularly the local area, eventually the detrimental impact will itself accumulate.

If the same opinion of 'insignificant impact' was concluded at each scheme, by only looking on a scheme-by-scheme basis, then eventually the accumulative impact becomes significant, but it will be too late. Each small impact adds up.

Starlings: Wintering birds like the **Starling** roost annually at Wood Green Common apart for the year when the bypass was being constructed and they moved on (2024-2025). They murmurate in a spectacular display above the Common at sunset before dropping into the reed beds and then murmurate again at sunrise. The winter of 2025-2026 saw a return, but not the full numbers of pre by-pass construction, however numbers grew as the winter migration season continued.

Turtle Doves: have been visiting a garden in Wood Green, whilst **Song Thrushes** (amber listed) and **Mistle Thrushes** (red listed) return annually across Site 4 and the CRC4. Turtle Doves have also been recorded at Site 7A a short distance from Site 4.

Fieldfares (red listed) and Redwings (amber listed): are in abundance across the winter fields of Site 4 and CRC4 and overnight in flocks in the trees of the small copses and significant hedgerows across Site 4 and CRC4. Removal or disturbance of significant hedgerow across Site 4 and the CRC during the construction of the Site and cable route will have a serious detrimental effect to these endangered birds.

Otters: were reported as not being present surrounding the order limits yet there are known breeding family units in the Starston Beck which are within the order limits as well as in the Tas a short distance away from the Order Limits which is why further research into White Clawed Crayfish have been paused as otters will eat any trapped crayfish.

Missing private water supply surveys and consultation?

Environmental Impact Assessment conducted by East Pye Solar failed to survey sufficiently the private water supplies for properties surrounding site 4 and CRC4.

In addition to private water supplies, most properties have **private sewage systems** such as septic tanks and treatment plants, and these **have not been assessed at all**.

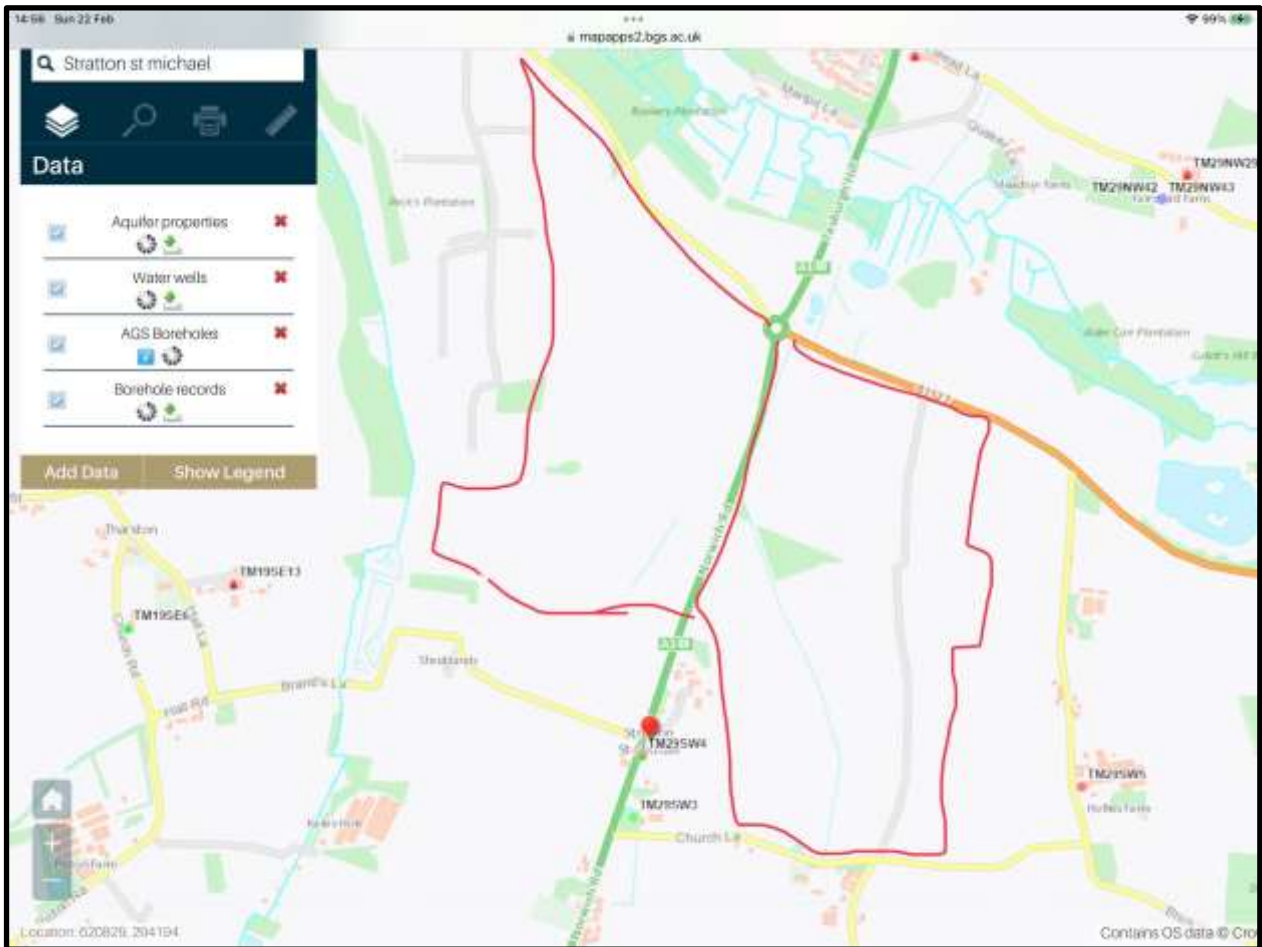
Impact will be significantly affected primarily through:

- increased flood risk - site 4 is in flood zone 3;
- altered surface water drainage and ditches;

Solar panels increase the concentration of rainwater that drains off them, increasing the speed and volume of runoff in the spaces in between rows. Run-off has been observed to appear in channels on the ground as distribution of water changes to an unnatural fall. This can lead to **soil erosion and water logging (Sciencedirect), potentially overloading or damaging existing land drainage systems that private sewage systems rely on.**

Soil compaction during construction, operation, replacement and decommissioning reduces the grounds permeability which could impact the functionality of soakaways especially if not managed.

Risk of **sediment or pollutants** entering the system as well as affecting the functionality of the system is a significant risk to public health and ecology.



Map shows private water supplies and wells in the immediate boundary to Site 4

Noise

No noise assessments have been carried out on Cable Route Corridors especially CRC4 which is 8km long and impacts many tens of homes in close proximity of the three compounds, haul roads, trenching, HDD and AIL and HGV routes.

The Applicant has considered the NSR to include CRC however CRC4 is unique due to its length and should be considered like any other Site.

Utilities

Site 4 has multiple utilities running along the boundary edges, roadside verges and across the Site including underground cabling as well as overhead power lines. Site 4B will be connected to Site

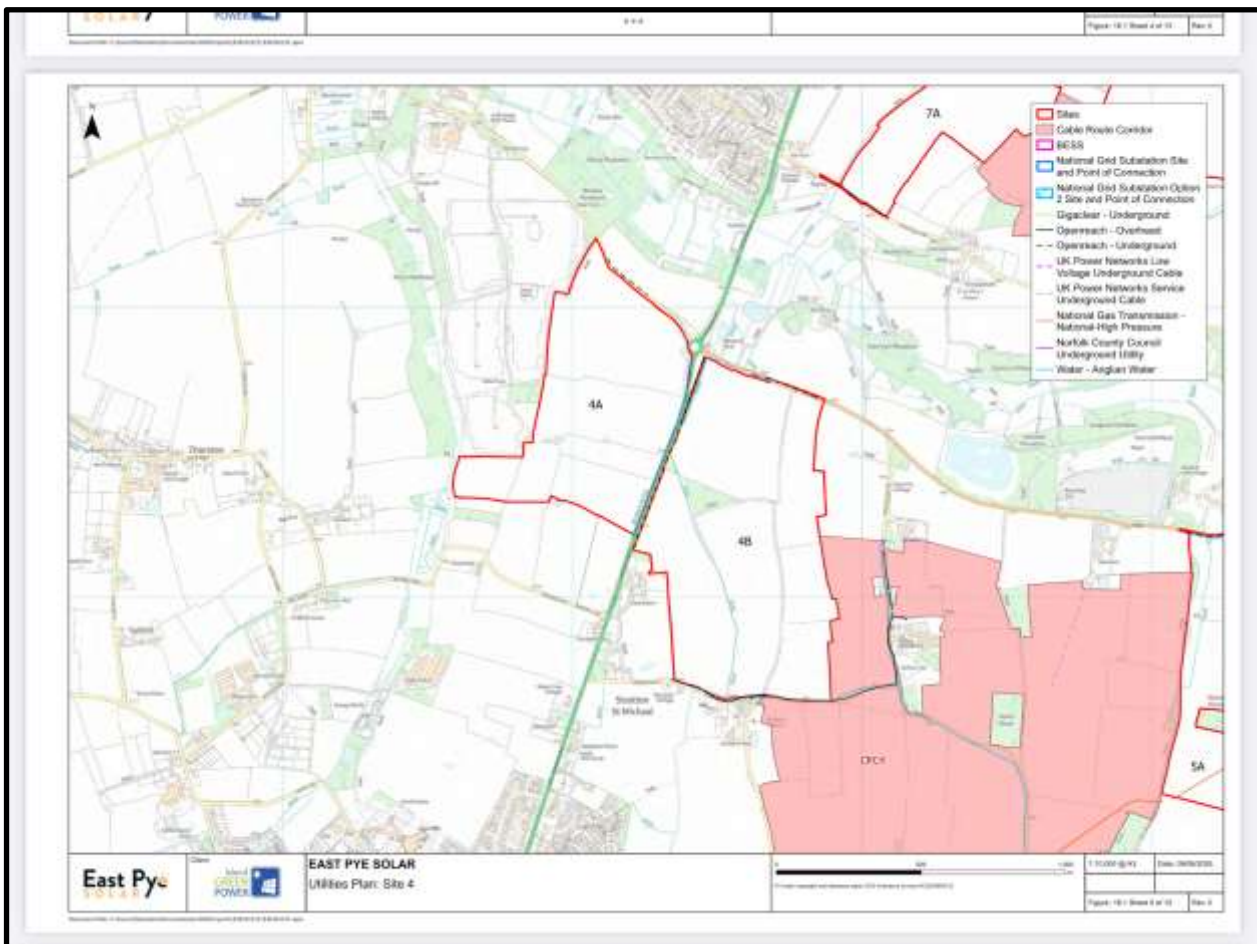
4A across the A140 which has embedded water pipes, sewage pipes and other utility infrastructure.

CRC4 will also have embedded utility infrastructure along verges and fields will have their own irrigation systems. The field earmarked for CRC Compound 2 on Mill Road replaced all irrigation in 2024.

CRC4 and Compound 2 is also sited less than 100m from a mains gas transmission pipe.

These have not been accessed nor mapped.

No mapping or assessment has been carried out on Cable Route Corridors especially where CRC4 is 8km long.



Map shows multiple utilities surrounding Site 4

With limited Broadband connectivity, rural communities rely on satellite services like Starlink. Many mobile phone providers are now abandoning new masts due to the long planning process and offering back up signals via Satellite.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite broadband services operating in Ku- and Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.

Has the Applicant assessed if the banks of 4.5m high panels and the substations will interfere with mobile phone signals or blocking signals between users and masts?

Water for Cleaning Panels

Where's the water coming from?

East Pye Solar will be using wheel washing amenities without stating how much water will be required and where the water is coming from or where it will go afterwards. However, the real question is water for the panel cleaning.

East Pye Solar will require 7,136 cubic meters or 7,136,000 litres (the equivalent to 2.85 Olympic-sized swimming pools)

East Pye states they will clean by using water only.

De-ionised water would be transported to the Order Limits by tanker. It doesn't state the size of the tanker nor how many journeys that will be so looking at a tanker from 10,000 litres to 40,000 litres that would equate to **714 @ 10,000 litres to 179 tankers for 40,000 litres which is 1428 to 358 two-way journeys**, no doubt all using fossil fuel rather than electric.

The di-ionising water process also requires more energy. Has this been included in the impact of the Scheme?

With water in the region in short supply and a hose pip ban has been implemented since June 2026 with Anglian Water refusing access to supply so far, where will the water for cleaning come from?

Assuming all water companies will also be protecting supply to avoid the scenario of Cleve Hill Solar in Kent using local supply from standpipes and leaving residents with no water at all, **how can this water volume be achieved?** Add this to the accumulative impact of other Schemes across the region and the **water requirements will be huge and haven't been addressed in any of the documents.**

East Pye Solar documents (The Scheme APP/6.1.4) state that due to the *'wet UK climate, Solar PV Panels are largely self-cleaning and determination in supply due to dust or dirt is generally low. Yet the requirement and frequency of cleaning the panels are due to the build-up of dust and dirt which depends on specific conditions. For example, the presence of fine dust emitters such as quarries, agricultural operations (harvesting) and nearby woodlands can all impact the level of dust deposition.'*

With the expansion of the quarry off the B1527 between Site 4B and 5A as well as the area being predominantly agricultural (crop farming) as well as small and larger wooded areas, the chance of dust deposition has to be considered very high. If I didn't clean my windows for two months, which are also vertical not horizontal or angled upwards, they would be filthy from dust off the fields and trees, bird poo and insect impact.

The documents state, *'the main factor influencing cleaning requirements in the UK is lichen growth, which is also influenced by site and climate factors.'*

Lichens grow on solar panels through symbiotic relationship between algae and fungi in a 3-stage process:

- **Initial Algae Bloom:** Moisture trapped along the lower edges of panel frames, combined with sunlight and organic debris (or nitrogen-rich bird droppings), allows algae to form a slimy, green layer.
- **Symbiotic Bond:** Once the algae is established, fungal spores take hold. The fungus feeds off the sugars produced by the algae and, in return, locks onto the microscopic texture of the glass.
- **Hardening:** The fungus acts as a natural glue, anchoring the composite organism tightly to the panel surface. It then slowly spreads across the glass, feeding on environmental nutrients and carbon dioxide.

Why It's a Problem for Solar Panels

- **Reduced Output:** Lichen heavily shades the underlying photovoltaic cells. Studies show that a severe infestation can reduce energy output by 15–25%, even on sunny days.
- **Permanent Damage:** As the fungus grows, it acts corrosively and can permanently etch or scratch protective anti-reflective coatings on the glass.
- **Hot Spots:** By completely blocking individual solar cells, lichen forces the surrounding functional cells to work harder to bypass the blockage. This generates excess heat, which can permanently damage the panel

Risk Factors for Lichen Growth

Lichen needs water and sunlight, both of which solar arrays are exposed to. Growth is accelerated by nutrients such as nitrogen and ammonia:

Bird droppings are rich in nitrogen, which is fuel for lichen growth. If birds perch at the top of the panels, rain can dissolve any droppings, run down to the bottom edge and feed algae if present.

Oak trees have been linked to an increase in lichens on modules near them within solar farms. This is likely due to rain falling through the canopy, depositing nutrient-rich bird droppings and aphids' sticky honeydew. The trees also increase local humidity, creating more favourable conditions for algae and lichens to grow. What's less clear, as yet, is why lichen growth seems to be so much greater close to oak than any other tree species.

Farms - particularly dairy, poultry and grain stores - contribute to high local levels of nitrogen and ammonia in the air, both of which fuel lichen growth. Cattle produce a lot of ammonia emissions around where the animals are housed, and so can poultry, especially in moist conditions. Crop spraying can catch in the wind and blow liquid or gaseous nitrogen onto nearby solar panels. Similarly, fertilisers can incur a spread of nitrogen and ammonia quite a distance.

Norfolk is the perfect climate for lichen growth as the climate is relatively mild and damp. All the components to grow lichen are readily available across the Order Limits and can be seen on many trees and hedgerows across the area.

The area is surrounded by poultry, beef and pig farms. Also, as a large crop area, grain stores and mills are located within the Order Limits. Organic matter (muck) spreading is normal practice across all arable fields.

Norfolk is a major oak tree area with the English Oak serving as the most common broadleaf tree species in the county. The Norfolk Landscape Tree Study found that the oak is the dominant deciduous tree in Norfolk's woodlands and can be found growing in more than 50% of the county's hedgerows and a major habitat for the region's abundance of birds.

*'The requirement for cleaning due to loss of output is balanced against the cost of the cleaning operation. East Pye Solar believes that some sites can operate **without** the need to be cleaned, whereas others require cleaning **annually**.'*

It won't be known until the Scheme is operational about the need for cleaning so, on a worse case assessment is assumed as a two-year cycle, although the documents make it unclear if that is the whole site.

However, what about those that require cleaning more regularly or the worst case is underestimated? All sites are surrounded by birds, oak trees and farming whilst others have

quarries too. The additional impact of those next to main and busy roads like the A140 and B1527 with dust, dirt and debris will increase.

Operational Waste

Site waste would primarily be general (Household Type) from staff visiting. Although the documents state it will be segregated for disposal it does not state where it will be disposed of nor the impact to local services.

Waste components such as damaged PV Panels, batteries, cables, connectors and mounting structures would be removed and recycled as far as possible.

But East Pye Solar doesn't state where they will be disposed of and as solar panels are classified as hazardous WEEE (Waste Electrical and Electronic Equipment) they cannot be legally sent to landfills in the UK. Compliant disposal requires using WEEE-approved facilities to recover valuable materials like aluminium, glass and silicon.

Panels contain toxic materials which require specialised treatment.

Industrial-sized solar would require an Environment Agency permitted Approved Authorised Treatment Facility (AATF) which would need to be able to cope with not just decommissioning but also the replacement of panels several times across the scheme.

This has not been dealt with within the documents.

Operational Staff

Throughout the consultation period the community were being told the Scheme will create **'local jobs for local people'**.

East Pye documents state **'no permanent on-site staff will be required to operate the Scheme.** There will be limited staff facilities located in the control room associated with the 132kV and 400kV Substations. Equipment for monitoring the Sites will be located in the Relay and Control Room. This would typically be **accessed remotely**; it would be available for occasional physical access during routine visits.'

Workers will be required for full solar replacement (129-240) which will be the construction team that are shipped about.

Otherwise, it will be ad hoc limited maintenance roles including cleaning and up to 5 visits a month.

So local people were being told inaccurate information as a local benefit to the Scheme.

Yet multiple jobs will be lost across the area in agriculture and the agricultural supply chain, hospitality, tourism.

Views from Listed Properties

Site 4 is bordered by many listed properties of Grade I, Grade II* and Grade II.

All have uninterrupted views across open countryside which will be removed and replaced by views of industrialisation; panels, substation, security fencing, CCTV etc.

Landscaping across the scheme will take at least 15 years to become established but the landscape itself changes the character of the open countryside to one of enclosure, out of character and ‘alien’. Landscaping will be irrelevant when it is without leaf.

Regardless of moving the panels further away from the listed buildings in Church Lane and from Norwich Road, all buildings that have open views across farmland will still be in full view of panels.

The natural open landscape includes significant hedging and individual trees dotted around. The artificial landscaping will create a thick, unnatural appearance with an emphasis on screening.

See Chapter 7.3 Visual Effects on Residents and Settlements for more detail.

Visual Assessment Tables

The Visibility Assessment Tables are subjective.

In the same way the person responsible for Landscaping (Jess) considered, at the Zoom consultation in June 2025, that the 400kV substation on Site 5 can’t be hidden, even after 15yrs, as “it’s too tall, but what’s wrong with a substation on a field anyway?” She then shrugged!

Visibility is considered ‘minor/negligible even if the view is changed significantly. For example, VL10 south west of A140/B1527 roundabout looking across sub-site 4B.

‘The substation and solar arrays would remain a clearly noticeable change in the view of the location however influenced by man-made structures like highways, road signs and the roundabout which would reduce the overall effect somewhat’.

Screening would not be performing at Year 1 however by Year 15 it was considered (if successfully established) that *‘visibility of the elements within sub-site 4B is predicted to reduce.’*

‘However, glimpses of solar at maximum height (4.5m) and the 132kV substation (13m) would remain possible resulting in perceptible change from baseline conditions.’

Yet this is considered minor/negligible.

It is also worth stating at this point that screening would equally change the baseline conditions significantly by creating a feeling of enclosure as opposed to the open vistas and character of the landscape as it is today.

Driving between Sub-Sites 4A and 4B almost daily never fails to make me feel the view insignificant due to the highway, signs and roundabout. It's open and green/yellow; it's beautiful.



Sub-Site 4B Spring 2026



View across Sub-site 4B January afternoon 2026 with man-made structures



View across Sub-site 4B January afternoon 2026 with man-made structures



View across Sub-site 4B January 2026 with man-made structures



View across Sub-Site 4B January 2026 with man-made structures



East Pye Own documents show open views across sub-site 4B

Chapter 3: Site and Surrounding



Long Stratton is a small developing town maintaining its village feel and a current population of around 5,000, situated halfway between the county city of Norwich and the market town of Diss.

Sited on the A140, the Roman built road runs from Cromer on the north Norfolk coast to Ipswich in Suffolk.

Historically Long Stratton consisted of two villages; **Stratton St Mary and Stratton St Michael**. Both are recorded in the **Domesday Book**.



Stratton St Mary, Grade I Listed with its round tower and home to the Sextons Wheel



Stratton St Michael, Grade I Listed

Long Stratton has deep Roman roots with its name deriving from the Saxon terms for “Settlement on a Roman road” (Straeat and tun). The Roman settlement of Venta Icenorum at Caistor St Edmund is just 9 miles north of Long Stratton.

Many Roman archeological artefacts have been found in this area, including on Plot 4, indicating a long term

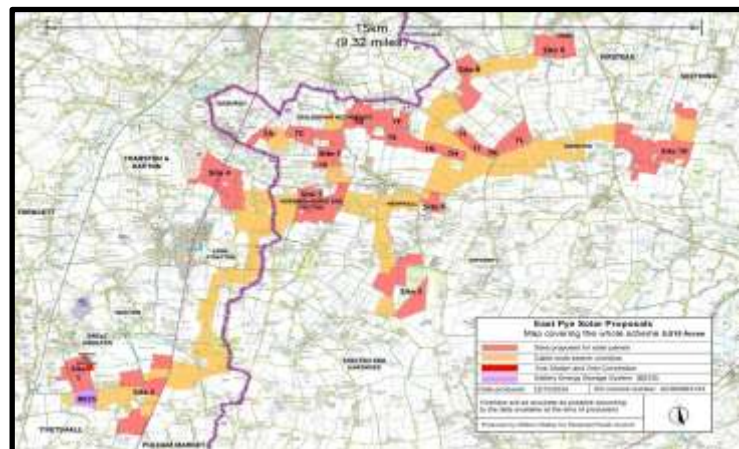
presence, probably being established during the Roman occupation 43AD onwards.

Brand's Lane on the southern boundary of Site 4A has revealed evidence of prehistoric, Roman and medieval activity. Also, preparations for the A140 bypass revealed evidence of Roman settlement (Norfolk Heritage Explorer record NNHR 4435, surveys 6078-07090).

Boudicca Way

Long Stratton lies within what was the territory of the Iceni tribe, hence the beautiful long distance waymarked **Boudicca Way**, named after their Queen Boudicca. The walking route passes just to the east of Long Stratton Conservation Centre as well as along the cable route corridor 4, running for approximately 36 miles between Norwich and Diss including through CRC4 which will be closed during construction.

Many people walk parts of Boudicca Way daily on circular walks, whilst walking groups incorporate it on their routes. However, many more serious hikers walk the full route staying at local campsites and BnBs.



Boudicca Way

Via Beata pilgrimage route

The Via Beata Pilgrimage route is over 400miles long and spans some beautiful stretches of England and Wales from Lowestoft in the East of England to St Davids in the West of Wales, including through Norfolk and specifically Great Moulton and incorporates Tyrrel's Wood.

The route uses roads and spaces that will be impacted by the East Pye Solar Scheme.

The Via Beata is becoming an established route with written guides for approximately every 10 miles.



The Rebellion Way

The Rebellion Way, a 234 mile circular cycle route that encompasses Norfolk, passing through Long Stratton en route and takes in sections of Boudicca Way where it is accessible by cycle. While Norfolk is now known for its relaxed, timeless, pastoral charm, the cycle route's name reflects the county's fascinatingly turbulent history from the Iron Age onwards, commemorating two iconic rebellions led by warrior queen Boudicca and Norfolk landowner Robert Kett.

Long Stratton is bordered by the rural parishes of Tharston and Hapton, Forcette St Peter, Tasburgh, Morningthorpe and Fritton, Pulham Market and Wacton.

With the completion of the bypass in 2025, Long Stratton is rapidly growing within the control of the Long Stratton Neighbourhood Plan and serves as a key commuter town for Norwich.



Map of Long Stratton including by-pass

In the past, Long Stratton has grown in response to the services it has provided to the local surrounding rural villages, particularly since the end of World War II. Many local villages have few or no resources beyond a basic local shop, so Long Stratton is a central hub.

Long Stratton is now growing into a thriving small town that supports many resources including the South Norfolk Council Leisure Centre, a library, two pubs, three restaurants, a supermarket, a medical centre, several takeaways, two dental practices, care homes and multiple independent small businesses servicing the local community and surrounding villages. A Shell petrol station and Aston Martin/Lotus garage is located directly on the old A140 Ipswich Road and within the Conservation Area.

Its central street holds much attraction as there are a **plethora of listed buildings of architectural diversity and historic quality**, indeed a **Conservation Area was established in 1975** and most of the village centre lies within it. Much of the central street has been almost unchanged for over 100 years.

(LongStrattonDesignGuidelines<https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/7-lsnp-design-guidelines-2020.pdf>).



Long Stratton Conservation Area

At present the population is supported by three schools: Manor Field Infant, St Mary's Junior and Long Stratton High (longstrattontowncouncil.info). With a further new school proposed in the housing development plan on the east side of Long Stratton as part of the Long Stratton Neighbourhood Plan (adopted) following the construction of the bypass.

An industrial park is situated on the western border of town with multiple businesses serving the community. In addition, there is a small private Long Stratton Airstrip (GB-0264) which serves general aviation, including light aircraft and helicopters. Other airfields such as Tibenham Airfield and Hardwick are nearby. (UK Airfields).

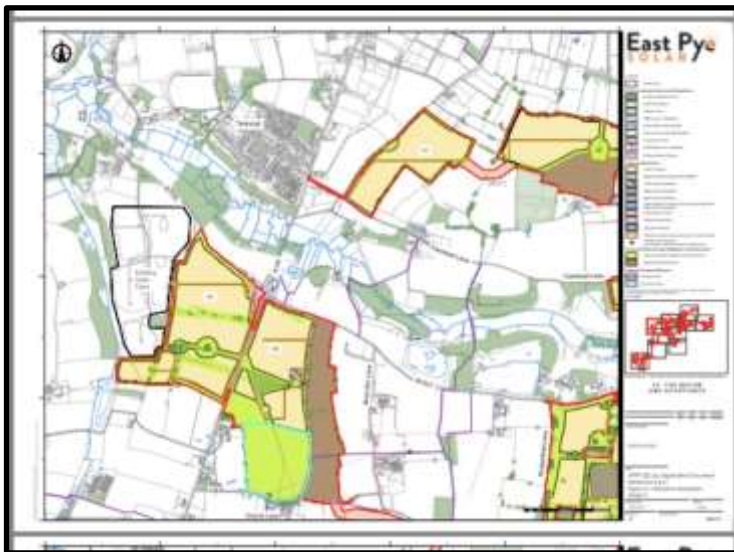
Land parcel 4 is sited on the northern boundary of Long Stratton and within a few hundred metres of the Long Stratton Conservation Area, with an abundance of listed buildings plus schools and facilities.

Land parcel 4 is surrounded by multiple listed buildings and also encompasses several Public Rights of Way particularly across sub-site 4B, including Long Stratton footpath 3 and footpath 4 which will be closed throughout the development and bordered by security fencing and CCTV during operation.

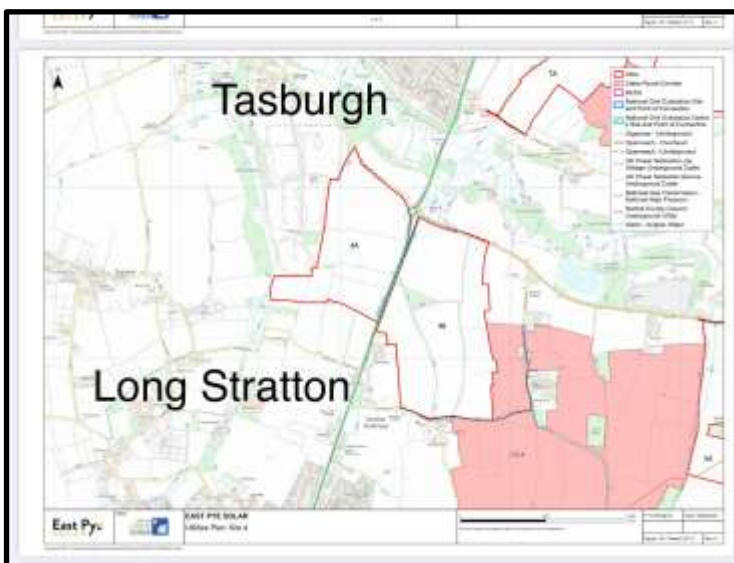
Many footpaths, approximately 16, will also be affected across Cable Route Corridor 4 which means that most footpaths for 6km north to south, to the east of Long Stratton, will be out of action for at least 2 years.

Land parcel 4 is located 100m from the nearest tributary point to the River Tas, 300m from Stratton Bridge over the River Tas valley and ~400m from Tasburgh village.

Tasburgh was also mentioned in the Domesday Book of 1086 as Tasburc or Tasburch. 'Burgh' being the Anglo-Saxon word for a fortified settlement and refers to the hill fort enclosure in the centre of the village. The origin or meaning of the word Tas is not so certain but most probably is linked to the name of the **river Tas, a chalk stream that runs to the west of Tasburgh with tributaries flowing to the north and west boundary of Site 4.**



Location of Site 4 in relation to Tasburgh, river Tas, site 7 and site 5



Location of site 4 between Long Stratton and Tasburgh as well as site 7A and site 5A



Maps show the location of Site 4 in relation to Long Stratton and Tasburgh as well as the Hempnall roundabout, Hall Farm Solar and a cumulative impact across the area.

The **Long Stratton Neighbourhood Plan (adopted)**

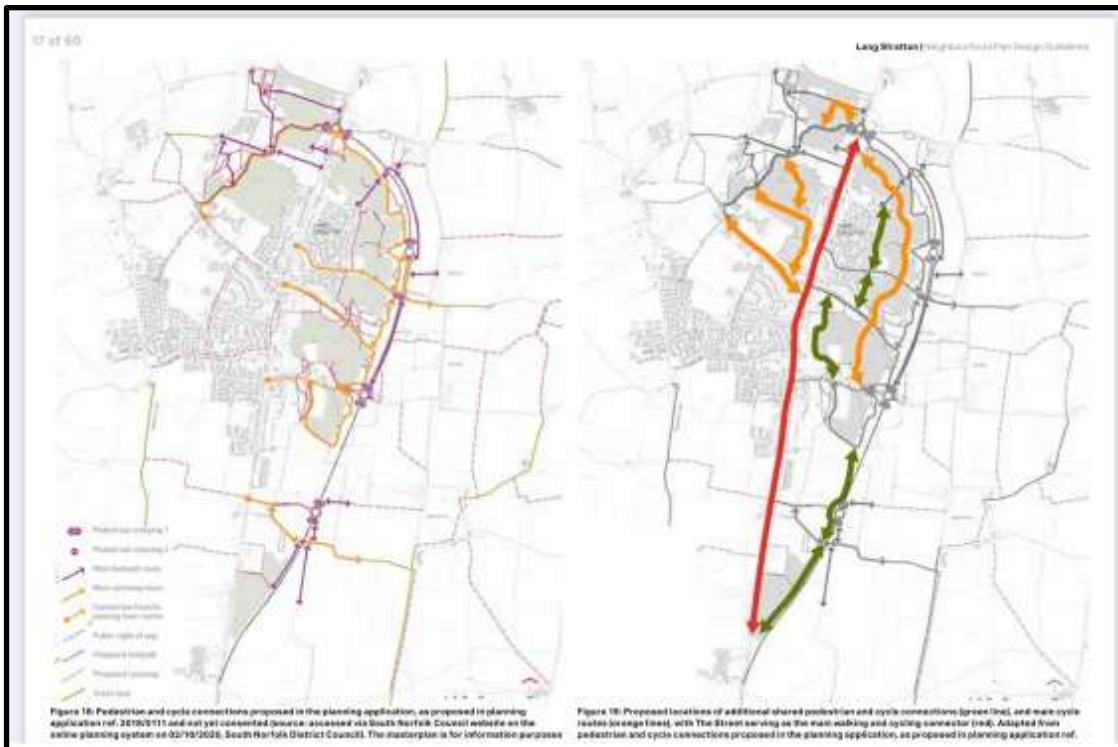
<https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/long-stratton-neighbourhood-plan-adopted-version-october-2021.pdf>

forms part of the statutory development plan and places strong emphasis on:

- protecting the **historic character and setting** of Long Stratton;
- maintaining a clear **distinction between the settlement and surrounding countryside**;
- safeguarding rural approaches, landscape buffers and key views;
- managing growth through planned housing, not industrial infrastructure.

“Long Stratton village will grow into a town; however a village feel will be retained. Long Stratton will keep its close links to the surrounding countryside, and the characterful feel of the enclosed historic centre will be strengthened not just as a result of reduced through-traffic but due to physical improvements which can take place once the by-pass has been built.”

The **growth of Long Stratton is planned within the boundaries of the by-pass** with significant emphasis on maintaining a connection to the surrounding countryside and settlement edges with clear distinction between the two.



3.4. Settlement Edges

- Interfaces between the existing settlement edges and the eastern village extension should be carefully designed to integrate new and existing communities. This is particularly important where new residential buildings will face existing residential properties that afford new back onto open fields.
- Edges should be designed to link rather than segregate existing and new neighbourhoods. The current belt of hedges that defines the existing settlement edge can be integrated into a new north-south green corridor along the border between existing and new neighbourhoods. This corridor can provide an additional pedestrian and cycle link that will contribute to the successful integration with the village. The new line should strike an appropriate balance between openness and enclosure that make residents through the settlement. A balance should also be sought between back garden privacy and natural surveillance.
- The illustrations and map on the opposite page present design principles to connect the new and existing settlements through a new green link. The design proposes a gently meandering green pedestrian and cycle link running parallel to the existing hedgerow. It also includes green verges of varying widths on both sides of the shared path, and low traffic areas fronted by new houses.



Figure 20: Northward view of the existing village edge at the east of Hill Farm Road showing the planted edge at the back of private gardens.

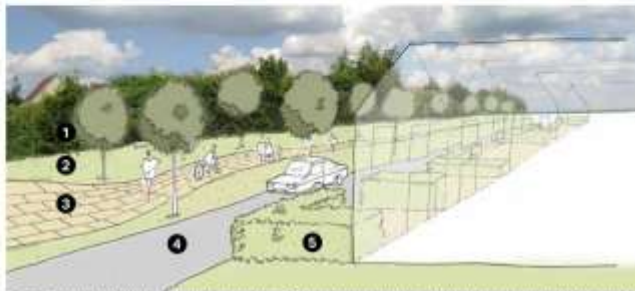


Figure 21: Perspective sketch of potential edge with the new settlement. The opposite page provides brief descriptions of the design elements numbered in the sketching.



Figure 14: View of the existing settlement edge with the open countryside.

Land Parcel 4 sits on the **immediate settlement edge** and functions as a landscape buffer.

Large-scale industrial solar development here would fundamentally undermine the Neighbourhood Plan's spatial strategy by urbanising the settlement edge and eroding the transition between town and countryside.

In addition to the impact on the Long Stratton settlement edge, Site 4 would encroach on the settlement edge and buffer to Tasburgh, effectively joining the two villages together.



The image shows the placement of Site 4 in **RED** in relation to Long Stratton as it stands at the moment. Sited on the external buffer zone of the town plan. Tasburgh can be seen to the north of the red area and would be less than 300m from the northern edge of site 4.



Site 4 in **RED** when the housing, school and community enhancement has been built in **WHITE**

The PEIR fails to assess neighbourhood plan conflict **parcel-by-parcel** or provide any lawful justification for overriding adopted local policy. This is a **structural policy failure**.

Plot 4 is of mainly BMV Grade 2 with hundreds of years of agricultural use that, without the scheme, would continue to be farmed as stated in the documents. East Pye Solar.

The fields grow a rotational selection of cereals (wheat, oats and barley), oil-seed rape, sugar beet and other break crops plus a small area of miscanthus.

The National Planning Policy Framework (NPPF) key principle states development should avoid using BMV land where possible and if development must happen should prefer lower-quality land and justify why BMV land is needed. Around 80% of the total scheme is BMV 1-3a with around 50% BMV grade 2. That's without the soil surveys on the CRC land which is also assumed by the Applicant to be BMV1-3a.

East Pye Solar's own documents state that the soil quality is generally higher than had previously been expected from initially published documents yet hasn't justified the use of it.

Chapter 4: Reasonable Alternatives and Design Evolution

Site 4 is 100 hectares of BMV Grade 2 arable land growing a variety of crop from cereals (wheat and barley), oilseed rape, sugar beet, miscanthus as well as resting crops.

It is made up of 12 fields separated by mature hedgerows, drainage ditches, ancient oaks, small woodlands and orchards as well as natural ponds and an unnamed water course that East Pye Solar call a drain in some of their documents.

Site 4 (sub sites A and B) straddles the busy A140 and is on the northern approach to the busy Hempnall roundabout that serves more than 20,000 vehicles a day.

The site supports a plethora of wildlife from herds of native deer, red and roe; bats including foraging Barbastelle, brown hares, many owls, badgers, ground nesting skylarks, endangered songbirds like greenfinches, linnets and thrushes.

Site 4 is located on the northern boundary and rural buffer zone of Long Stratton, within a 100m of the northern point of the Long Stratton by-pass and the Tas tributaries to the west and north. It is surrounded by, and within metres of, multiple listed residential homes.

NO ALTERNATIVE LOCATIONS HAVE BEEN SUGGESTED FOR THIS LAND PARCEL

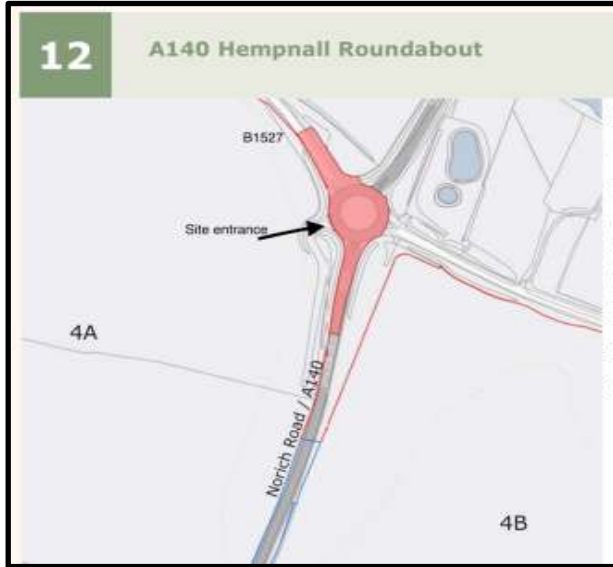
Site 4 contradicts every search condition initially set out by East Pye Solar.

Changes and Alterations:

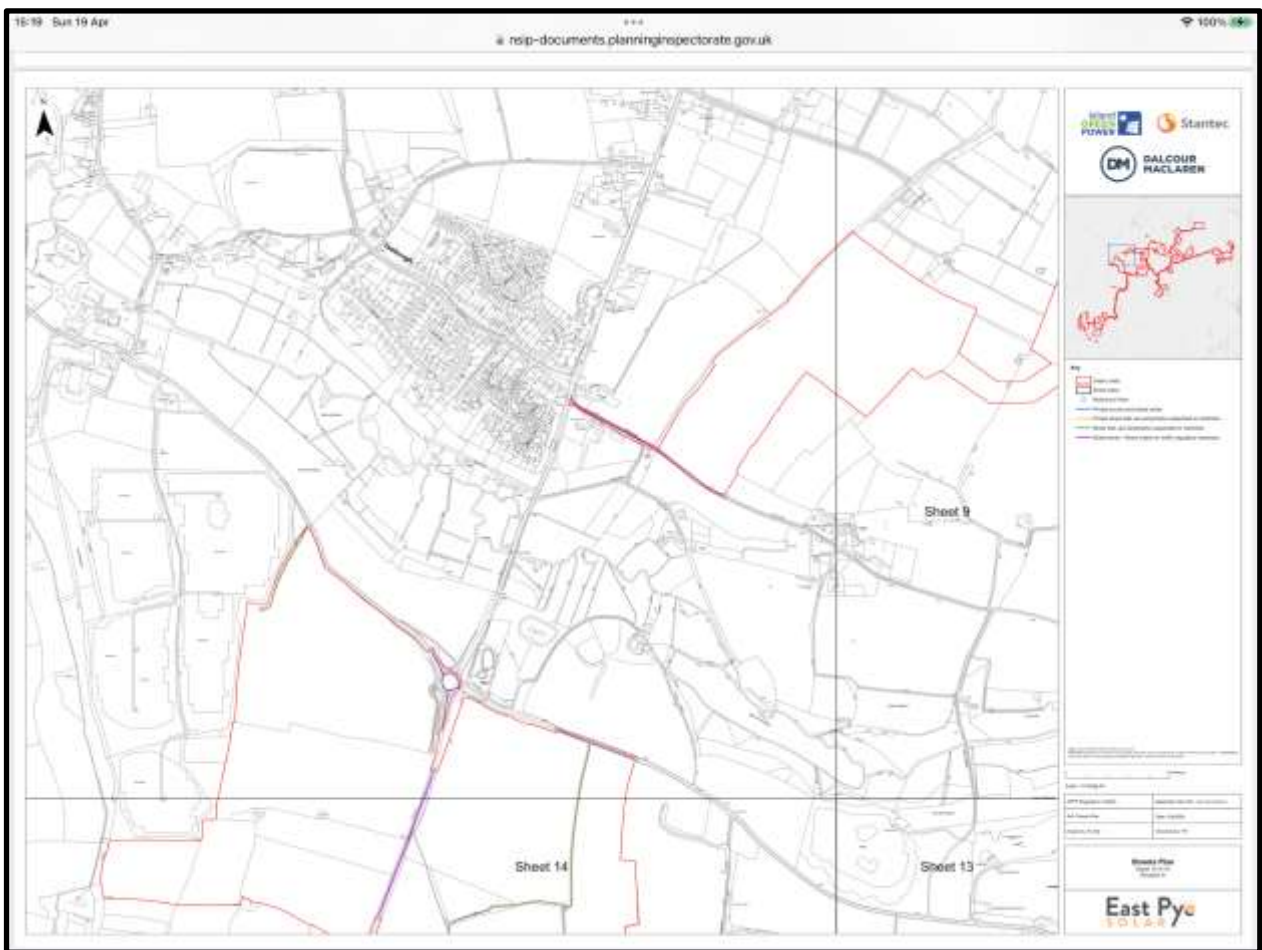
Over the course of the consultation period and since it ended, some changes to the design have been made to both sub-plots and cable route 4 (CRC4) which is connected and joins the Plot 4 to the rest of the scheme:

- **4A: a construction compound** has been added to the subplot to take the AIL and HGV haulage;
- **4A: compound added as a holding area** for HGVs to site 7A-F;
- **Increased boundary area at the Hempnall Roundabout** to accommodate turning and visibility to access A19;
- Amendments to the A140 northbound approach to the roundabout;
- Hempnall roundabout serves more than 20,000 cars per day in all directions and was developed due to previously being a serious accident hotspot;
- **Access to 4B: Access point A20 on B1527 requires crossing the carriageway;**
- A20 will be using the PRow Long Stratton 3 which will be closed for the duration of the construction term and bordered by security fencing and CCTV thereafter (if reopened);
- **A20 will also be potential access to Cable Route Corridor 4 haul road;**
- Plot 4A size unchanged

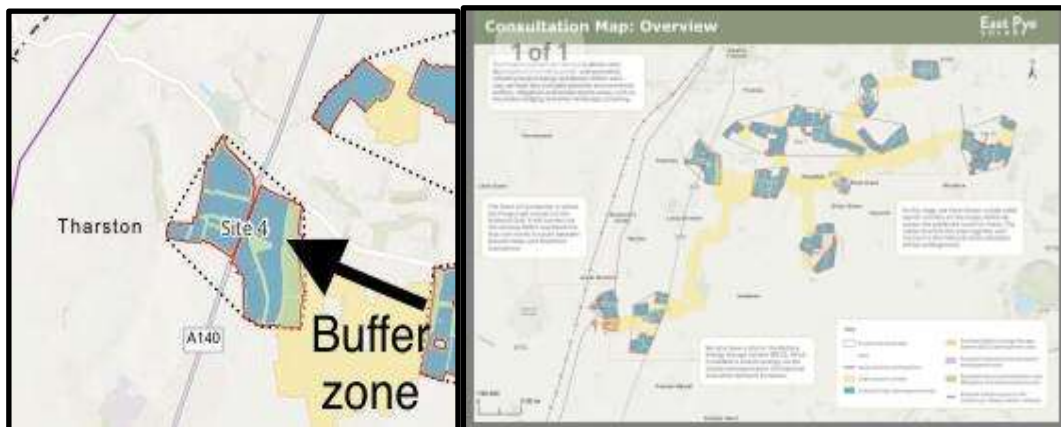
- **Site 4B size unchanged but panel area reduced** in the June 2025 consultation and **increased again** in DCO docs.
- Site 4B: An area of '**potential** mitigation and enhancement' is included but has been reduced and not confirmed. Who will maintain this area labelled as a 'Community Space';
- Some properties will be further from the panels, but the panels **will be in full view of all the listed properties** on Norwich Road and Church Lane;
- **132kV substation: added to plot 4B adjacent to PRow 3;**
- **Hall Lane: Targeted consultation (Oct 25) added Hall Lane as a transport route for Cable Route Corridor (CRC)4 to Compound 2 which was added in June 2025;**
- **Hall Lane** will include the **AIL route** and will require **changes to the NEW road layout following the bypass** and removal of significant hedgerows and trees;
- Hall Lane bypass bridge is built to national standard with a weight limit of 44tn. The proposed AIL is 78.6tn;
- **Properties** on the corner of Hall Lane **including listed property and within the Conservation Area** are included in the Book of Reference (part 1)
- **No in-person surveys** have been carried out due to by-pass construction although the by-pass was completed and has been open since August 2025;
- **Hall Lane and Long Stratton Traffic monitoring May 2026:** Hall Lane at junction with Parker's Lane, Ipswich Road (old A140 south of Hall Lane) and Ipswich Road, Long Stratton (centre of Conservation Area);
- **CRC4 haul road:** added in DCO **without consultation** even though all by-pass maps showed access to CRC4 is not accessible from any lanes along the by-pass and the only option to access CRC4 was via a haul road. East Pye Solar's own documents talk about 'when Edges Lane re-opens we can re-access' yet it never will be as there is no connection to the bypass.
- **Three CRC4 Compounds:** only two compounds are listed as such, yet another compound of the same size in Hall Lane is shown to receive haulage and AIL that is planned for the Hall Lane route.



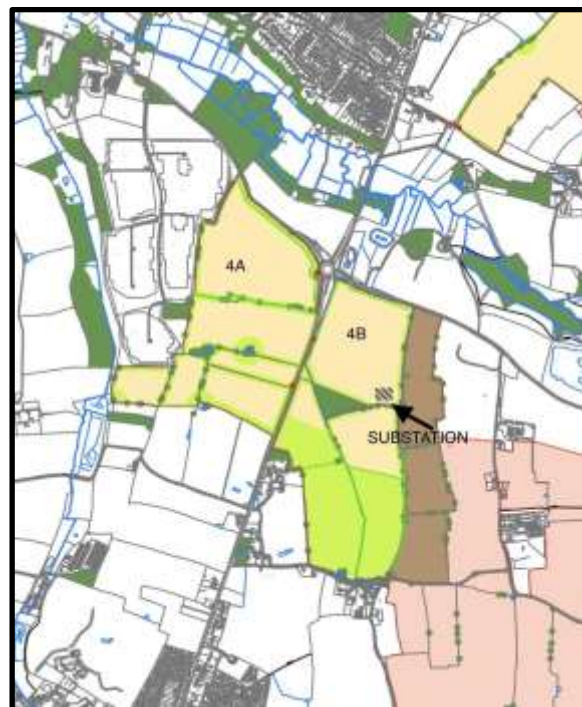
Changes to the Hempnall Roundabout

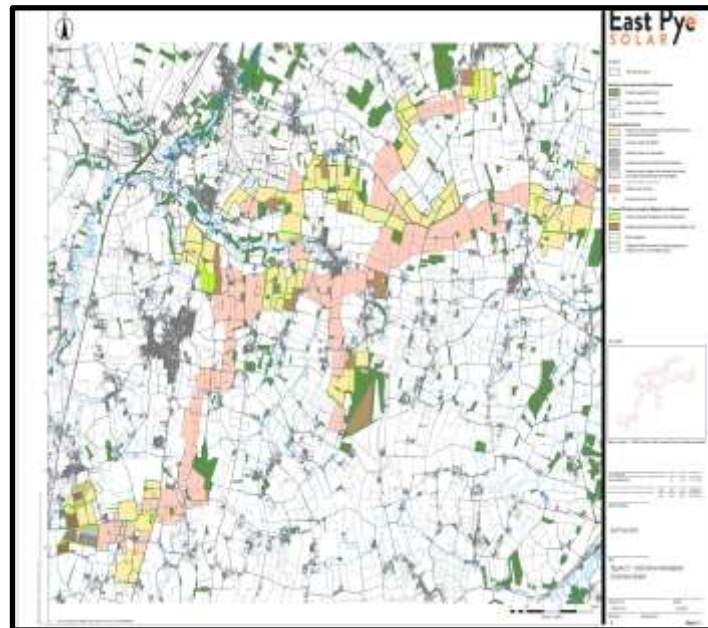


Maps show changes to Hempnall roundabout

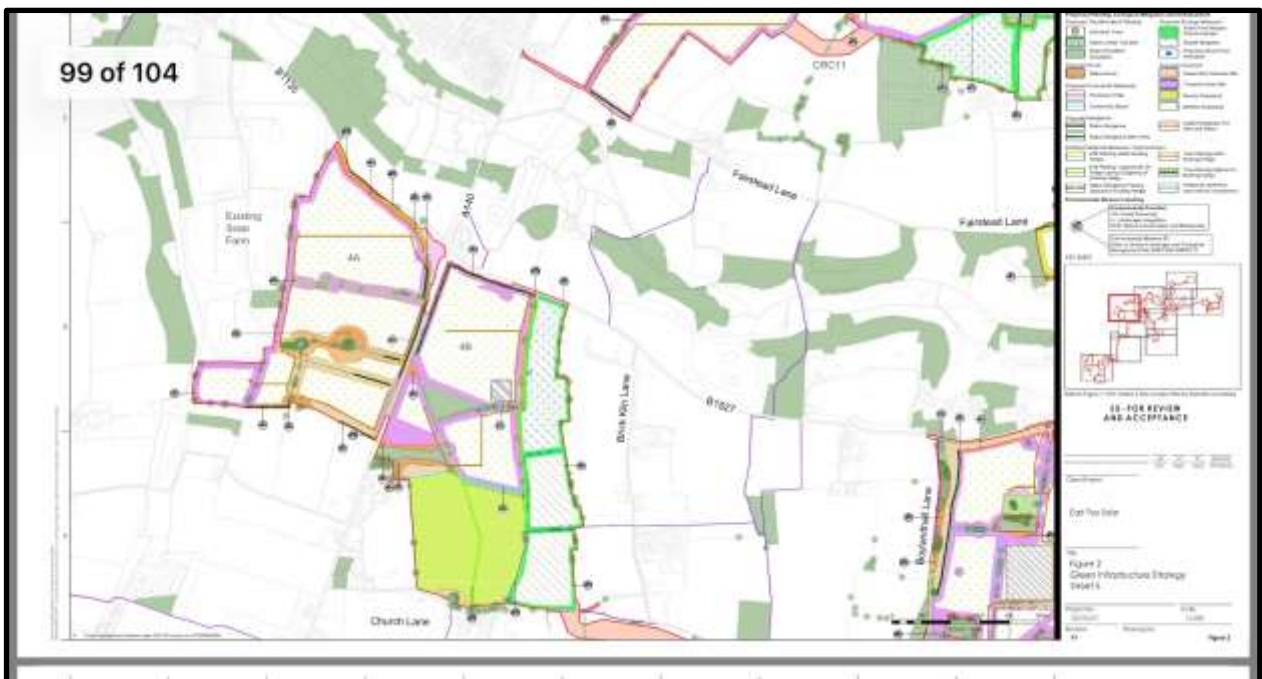


'Phase One Consultation Overview Map Indicative Concept Plan - October 2024'

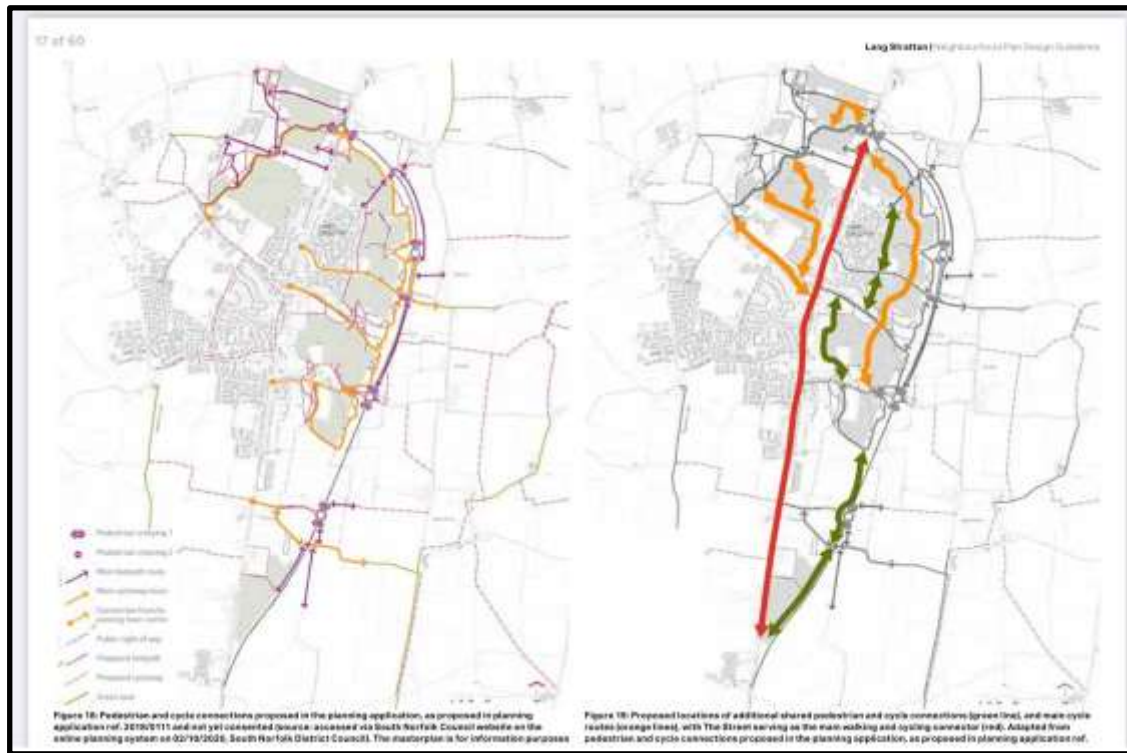




East Pye Solar Indicative Masterplan Overview Sheet June 2025



DCO documents March 2026



Map of Long Stratton By-Pass before the roundabout was removed from Hall Lane and changed to a bridge as the turning circle was too tight in Hall Lane

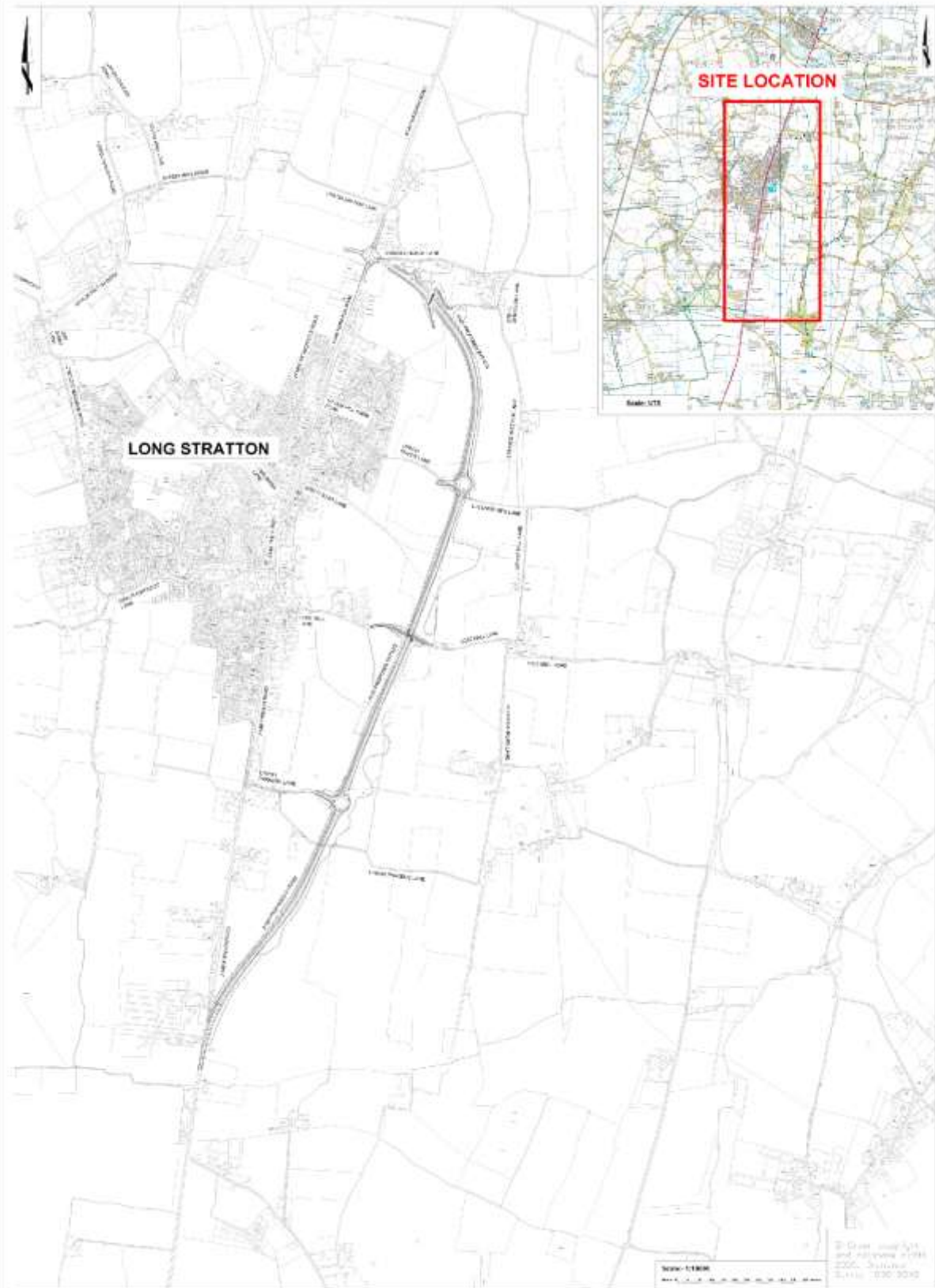
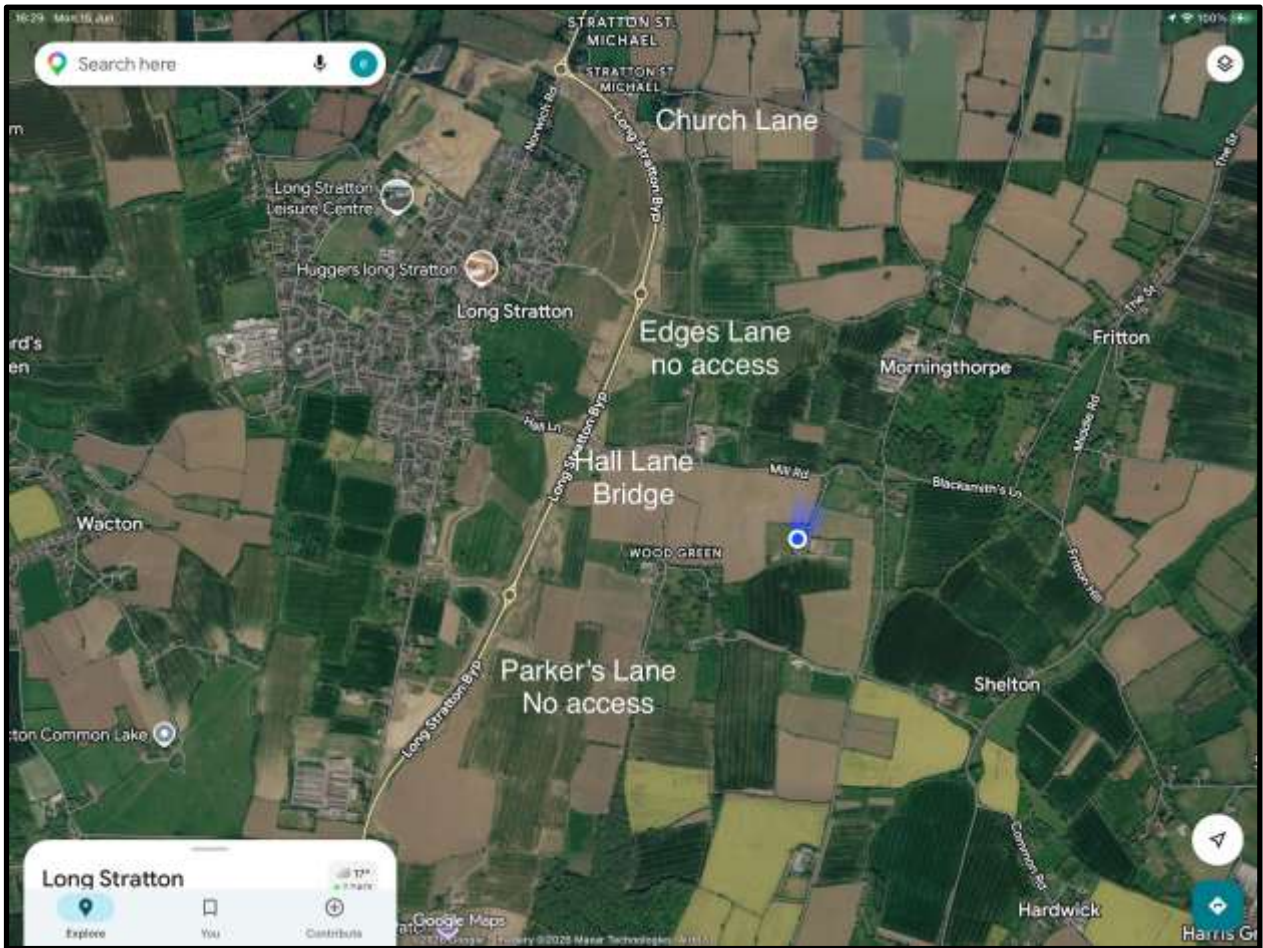


Image shows Hall Lane bridge and no connection to bypass at Edges Lane



Google Maps showing bypass including no access at Edges Lane and Parkers Lane as well as the new bridge at Hall Lane



Hall Lane, Long Stratton **WITHOUT** the bypass shown, proposed as AIL route to CRC4;
widening the top to allow for turning circle and potential removal of 20 mature trees



Hall Lane, Long Stratton shown without the by-pass



*CRC compound locations including the Hall Lane haulage compound that isn't listed as such.
Sited metres from homes on Hall Lane and Mill Road*



Hall Lane with the avenue of 20 horse chestnut trees



Hall Lane on the east side exiting the by-pass bridge as it approaches a blind corner at Reeves Cottage



Hall Lane, east side exiting by-pass bridge at Reeves Cottage meeting haulage from The Mill



Hall Lane by-pass bridge, west side. The only two-way part of the road as the new layout follows an S-bend as it approaches the bridge and continues turning the opposite direction as exiting.

The changes to Site 4A, 4B and CRC4 have created more issues and harm than resolved however no mitigation can justify the cumulative impact of this scheme.

Chapter 5: Scheme Description for this land parcel

What Site 4 can expect if plans are passed:

Overview:

- Solar array panels
- Mounting structures
- Cabling
- Cable corridor
- Conversion Unit Compound
- 132kV substation
- Construction Compound
- HGV Holding Compound for sites 7A-7F
- Interconnecting Cables
- Security fencing
- CCTV
- Lighting
- Two Site Access points (creating visibility up to 250m)
- Access tracks
- Panel change,
- Panel Cleaning
- Operation
- Maintenance of Site
- Decommissioning

PV PANELS

There are currently two options for the Mounting Structures which are being considered for the scheme which are described below.

Solar PV Arrays and Mounting Structure

The Scheme will use Single-Axis 4.5m high Tracker Panels (Option A) and/ or Fixed Panels (Option B). The parameters for each of these options are described below.

Option A: Single-Axis Tracker Panels

- **Site 4 will have 4.5m Single-Axis tracker Panels**
- PV Panels which are fixed to the Mounting Structure;
- Orientated north to south;

- They would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening);
- The modules would track from east to west throughout the day and would return to their resting position 60 degrees (facing east) overnight noting that at some point during the night will be 0 degrees (horizontal) and detrimental to foraging bats mistaking panels as water;
- The panels would face multiple highways during the day, east and west, with a **risk of glint and glare being significant**;
- The panels would create a **tunnel** on the A140 as they tower over the road users;
 - **The PV Panel would have a maximum height of 4.5m**



Image 1 Tracker Panels



Example of a 4.5m high tracking panel next to a person 1.65m tall. Average car is 1.40cm to 1.60cm

Option B: Fixed South Facing PV Arrays

PV panels that face south and are mounted to fixed Mounting Structures in an east/west configuration and would be installed between 15 and 35 degrees to the horizontal facing south to optimise daylight absorption. The PV Panel would have a maximum height of 3.5m



It's worth noting at this point that a small solar scheme at Hall Farm that sits on the west boundary to site 4A has fixed panels sited facing south and offers glint and glare when the sun catches them at the end of the day.

The same is the case for the Bloys Grove scheme at Mulbarton further up the A140 which is also fixed panels facing south and offers glint and glare distraction as the sun is starting to set.



Hall Farm, 20/5/2026 at 20:22 light cloud



Bloys Grove, Mulbarton March 2026 at 5.40pm

SOLAR PV MOUNTING STRUCTURE

The metal frames upon which the PV Panels will be mounted will be **pile driven or screw mounted into the ground to maximum depth of 4m**, subject to ground conditions.

The option to install concrete blocks as ballast may be considered, avoiding the need for driven and screw anchored installation.

The mounting frames would be made of either anodised aluminium alloy or galvanized steel.

CABLING

- Low voltage distribution cabling between the solar PV Panels and to the Conversion Unit compounds;
- Fixed to the Mounting Structure, and then underground between Mounting Structures and the Conversion Unit compounds.

High voltage cables are required between the Conversion Unit compounds, BESS and the 400kV Substation. Each site will connect to another site via the cable corridors.

CABLE CORRIDOR 4

The following activities would be required to construct the interconnecting Cables Grid Connection Cables:

- Site preparation and appropriate surveys;
- Building of **three** compounds;
- Haul road construction;
- Excavation would be undertaken using appropriately sized tracked excavator and carried out in layers;
- Topsoil would be segregated and stored on-site to be reused;
- The trench would be cleared and bottomed out, ensuring no hard protrusions;
- Sand bedding would be installed at the bottom of the trench;
- Cable installation will be conducted once joint bay locations have been established. However, it is not expected that cable installation would be continuous. Cables would be installed in groups or sections to ensure that works are completed in the most efficient manner practicable.

Site 4 is connected to Cable Route Corridor 4, the largest and longest of cabling routes joining the north of the scheme to the south. The total cable corridor is 24km long and CRC4 equates to approximately a third of the total cabling routes.

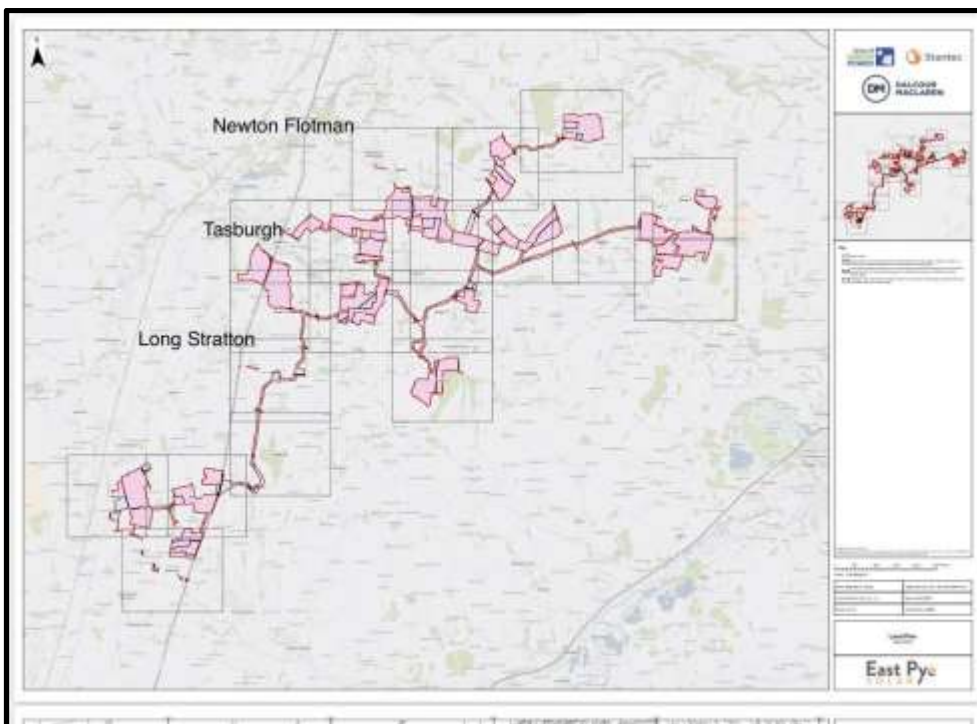
CRC4 runs for approximately 8km from Sites 4 and 5, south, joining at Site 2C near Great Moulton for the BESS, substation and National Grid substation. The cabling will carry 33kV, 132kV and 400kV cables.

The fact that a cable corridor of 8km is required to connect the scheme together, demonstrates how disjointed it is.

The initial proposed sites for the BESS and substations were scoped in the north part of the scheme; to the west of Newton Flotman, Tasburgh and Long Stratton. East Pye Solar's own documents state the northern areas were preferred, and the only reason Great Moulton was decided upon was because the landowners signed the documents.

This shows this is a landowner driven scheme and not of best practise.

That isn't a good enough reason to permanently remove BMV Grade 2 from food production and decimate a village with permanent industrialisation as well as construct an 8km cable corridor that will dissect BMV 1-3a productive fields for up to two years.



Map shows desired preferred location of BESS, substations and National Grid location

East Pye Solar documents (The Order Limits APP/6.1.3) describe the CRC4 as linking Site 2 with Sites 4 and 5 to the north and east of Long Stratton and ‘comprises numerous fields’.

In fact CRC4 is **~50 productive agricultural fields** growing various crops including multiple cereals, oilseed rape, maize, break crops and beet. Some have been used for grazing in between crop harvesting and have produced additional crops of haylage due to being high yielding BMV grade 1-3a.

These fields are a significant example of the Claylands with mainly small, enclosed fields linked together by farm tracks and surrounded by established hedgerows. The fields and landscape are quiet and relatively undisturbed therefore supporting a plethora of wildlife.

East Pye Solar, by the time of submission of documents, had not carried out a soil assessment on the Cable Corridor fields.

The documents state ‘CRC4 will incorporate some highway infrastructure’ however it will actually **incorporate the A140 twice**, at the south when joining to Site 2C and again at the north, around the Hempnall roundabout, between Site 4A and Site 4B.

In between this, CRC4 will cross at least a further **8 highways along the 8km route**.

It will also cut off multiple PRoW and Bridlepaths which are used daily by local people not just to enjoy the pleasure of walking but also for movement to school, reaching the facilities of Long Stratton and bus routes to work, college and Norwich or south to Diss and Harleston.

The cable route corridor will be 50m wide including the haul road although at times ‘*extending to 405m with narrower sections to avoid environmental factors*’ East Pye Solar docs. The CRC will be fenced with security fencing.

Although the documents stating the CRC will run along field boundaries where possible, the majority of CRC4 will dissect fields in half or diagonally. Creating a channel 50m wide means the fields will potentially be unable to be accessed or making the land that is left for farming in smaller areas and not practical or cost effective.

A 25m wide construction working width for trenching will be created. These will cross:

- Roads
- Utilities
- PRoW and Bridleways
- Hempnall Beck at Tyrrel’s Wood
- Tributaries of Hempnall Beck and Tas
- Watercourses

- Field Ditches - 3m deep at Parker's Lane to accommodate the field being in an Environment Agency Flood Zone and waterlogged in winter where the Hall Lane compound will be
- Tree Belts and significant hedgerows



Drainage ditch at Parker's Lane 3m deep as field floods and is in EV Flood Zone

CRC4 will also support 3 compounds of 130mx130m: Compound 1 off the A140 at the southern point, Compound 2 at Mill Road, about mid-way and a third compound off Hall Lane, Long Stratton (also midway) which isn't labelled as a Compound even though it acts as one and will be the same dimensions. The Hall Lane Compound is where the field floods in winter.

The Hall Lane Compound will receive the AILs with cable drums as well as other HGVs which can't reach Compound 2 due to the restrictive S-Bend road layout around the mill.

Compound 1 will be accessed via A140 which will receive most of the HGVs. A new two-way haul road 7.5m wide will be built to serve the HGVs going to and from Compound 2.

Twenty-two HGVs will access Compound 1 from the A140 (see Transport and Access for more details on route) DAILY with eleven of them making the two-way journey to Compound 2 across the fields.

The haul road will require removing the topsoil and subsoil and storing it in bunds

The number of AIL down Hall Lane hasn't been acknowledged in the documents although this is a residential area of Long Stratton and affects the Conservation Area. It is also unclear of the intention of access to Hall Lane based on the restrictions of road layout.

At present there is no detailed design for the cable route corridor.

Due to the layout of the fields, they support a plethora of wildlife acting as a corridor for native deer herds like red and roe as well as nesting ground birds like **skylarks, which can be found on almost every field in the scheme. Turtle Doves** have been found in gardens at Wood Green which is alongside CRC4.

Songbirds like red-listed linnets and greenfinches are thriving in the quietness and undisturbed swathe of land that CRC4 takes in.

The fields are **interlinked and typical of Norfolk enclosed land parcels**, surrounded by ancient and veteran trees, woodlands, ancient orchards and mature wildlife-supporting 'significant' hedgerows.

The fields on CRC4 are dissected with a few narrow single-track lanes serving local traffic between hamlets like Morningthorpe, Fritton, with its SSSI common and Wood Green with its protected Common.

The lanes act as the access routes for residents in this idyllic rural setting to the facilities of Long Stratton and the main route of A140.

Wood Green is the home to a small number of private homes and surrounds a common with veteran trees, reed beds and meadow. The common is a haven for wildlife including redlisted birds, deer, owls and a natural roost for wintering starlings that settle in the reed beds and murmurate across the trees and surrounding fields. The roost was disturbed with the building of the bypass however has returned this winter (2025/2026).

CRC4 will border Wood Green on the north and west side of the common at Parker's Lane.

Parker's Lane is also part of the Boudicca Way waymarked walk from Norwich to Diss.



Boudicca Way waymarker at Wood Green at CRC4

Wood Green is divided into north and south, each with one entrance/exit as the common is a no through route to each side. Wood Green North's only exit, and entrance is at Parker's Lane and onto Hall Lane. These are proposed as a haul route for the AIL and HGV to Cable Compound 2.

The documents state that Parker's Lane will be closed at some point during the construction, effectively cutting off the north side of the hamlet from entrance and exit as well as causing disruption from dirt, noise and construction traffic. **How will local residents' access and leave their homes as well as deliveries, farm traffic and emergency vehicles?**

There are multiple PRow and bridleways that crisscross CR4 as well as the protected Tyrell's Wood managed by the Woodland Trust.

The linked fields and quiet lanes allow people to walk freely, avoiding busy roads, surrounded by peace and quiet as well as multiple wildlife. These will be shut off as the 50m corridor will dissect the fields and at points will be over 400m wide.

The footpaths and quiet lanes are a significant escape to residents of Long Stratton and those in rural properties. Walkers, dog walking, hiking on the Boudicca Way, horse riding, cycling, running, bird/wildlife watching, detecting are some of the many hobbies and mental health support activities that are enjoyed by the residents in the area.

The PRow's are also a route for school children making their way to Long Stratton High School or the bus to Norwich for various colleges.

Boudicca Way is often a destination walk for keen long-distance hikers as well as those using the Waymarked Route as a pathway for shorter walks. It was also used as a charity run in 2025. Boudicca Way goes along the edge of CRC4 at certain points as well as directly as part of it at Parker's Lane and Tyrell's Wood.



Mill Road at the CRC Compound 2 and CRC4





Patchwork fields of Cable Route 4 between Edges Lane and Mill Road



Starlings murmuring and roosting at Wood Green Common (CRC4), February 2026

CONVERSION UNITS

Conversion Unit, a collective term used for the combination of electrical components including inverters, transformers and switchgear, used to manage the electricity generated by the PV Panels. The components may be housed together within a container on each site.

A container would measure approximately 3.5m (H) x 5m (W) x 15m (L).

Or the alternative option is for the individual electrical components to be housed in standalone cabinets. If in standalone cabinets, the Conversion Unit compound would be surrounded by 3m high palisade fencing, with integrated gates for access. The compound will be levelled and covered in a layer of gravel of 1m.

The containers would be mounted on adjustable legs on an area of concreted hardstanding.

The configuration of equipment within the Conversion Unit compounds may vary however will consist of:

- Inverters
- Transformers
- Switchgears

Inverters

There are two options for inverters; string inverters or inverters located within a conversion unit compound.

String inverters are small enough to be mounted underneath or behind the PV Panels on the Mounting Structures and are typically 1.5m in length and 0.5m in depth by 1m high.

Inverters located within the Conversion Unit compound would either be standalone cabinets or housed within the container. The maximum size of a stand alone inverter would be **6m x 2.4m with a maximum height of 2.9m.**



Image 3 String Inverter



Image 4 Central Inverter Unit

Transformers

Required to increase and decrease the voltage of electricity generated by the solar PV arrays.

Should a standalone transformer option be required, the maximum dimensions would be **43m by 65m with a maximum height of 6.5m**

Switchgears

Switchgears are the combination of electrical disconnect switches, fuses or circuit breakers used to control, protect and isolate electric equipment.

Should a standalone switchgear be required, the maximum dimensions would be **6.5m x 9m with a maximum height of 4m.**

SUBSTATION

A 132kV substation is planned for sub-plot 4B adjacent to LSFP3.

These substations comprise of electrical infrastructure such as the Transformers, Switchgear and control equipment required to facilitate the export of electricity. The transformers associated with the 132kV Substations will either be single or dual.

Maximum **compound** parameters for site 4B:

- Maximum area of compound 0.5 hectare or 1.236 acres;
- Maximum height: 7m to the top of busbars;
- Relay and Control Rooms: 7m by 19m and maximum height of 4.2m;

- **Maximum height: 13m to top of busbars**

13m is the height of a 3-story house and cannot be screened even by Year 15, according to Jess on the online consultation event as 13m is too tall.

The compound will be surrounded by palisade fencing to a height of 3m



Image 132/33kV Substation (single transformer) East Pye Solar

INTERCONNECTING CABLES WITHIN THE SITES

The solar PV arrays will be connected to the 132kV substations via interconnecting cables. The cables may be installed underground or within casing attached to the mounting structures.

FENCING AND SECURITY



Perimeter fencing would be in place throughout the Sites surrounding the solar PV arrays and will comprise deer wire mesh with wooden posts at a **maximum height of 2.5m.**

Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of sites on galvanized steel poles with a **maximum height of 3m.**



LIGHTING

Motion-sensing security lighting will be provided within the substation, conversion unit compounds, to be used for maintenance and security purposes. In the event of an emergency, lighting will also be provided.

Temporary on-site lighting will be required during construction to enable safe working hours of darkness within the agreed working hours.

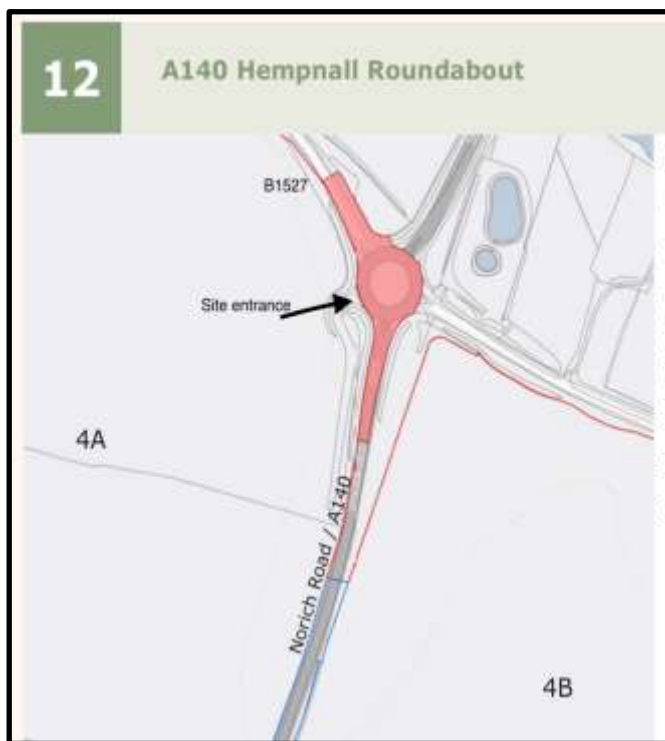
This lighting will be suitably designed as far as reasonably practicable so as to not cause nuisance and would accord with good practice measures to minimise light spill and glare. However of course this cannot be guaranteed especially when in the countryside there is no artificial lighting outside of the minimum offered in towns and villages.

SITE ACCESS

Access points into each Site or sub-Site will be designed to accommodate an articulated HGV with a maximum length of 16.5m. Visibility splays of 2.4m and 215m are required. In addition to the HGVs, Articulated Indivisible Loads (AIL) of up to 36.5m long will require additional consideration.

The access point A19 to sub-plot 4A will require creating a 5th exit off the busy Hempnall roundabout on the A140.

The northbound approach to the roundabout, the left exit as well as the roundabout itself is earmarked to be widened/alterd and for vegetation removal along the highway. This also targets the two ancient oak trees on the road verge.



Targeted consultation image of changes to Hempnall Roundabout



Google Earth image with access A19 and location of veteran trees

Access point A20 to sub-plot 4B is now agreed from B1527 to meet the substation and will use **PRoW3**.

Visibility to the right on exiting the site is restricted to 174m by a wooded area especially in conjunction where the road bends to the right and then to the left.

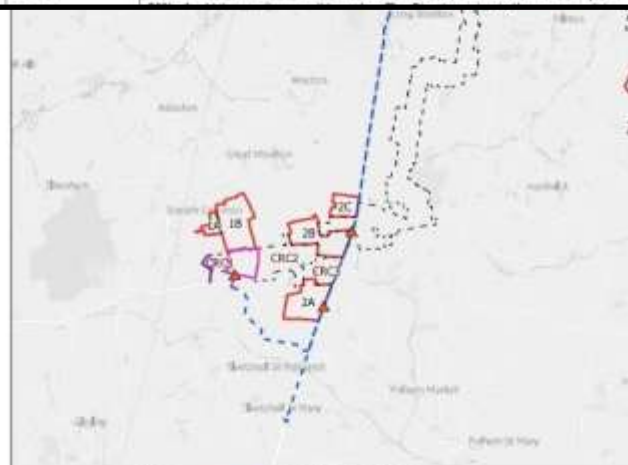


Images show Access A20 to site 4B and the location to PRoW3 as well as the length of visibility splay looking east when exiting from Site 4B.

Image 3 shows the distance between A20 to the woodland area which will shield clear line of site for exiting construction vehicles onto the B1527 as well as offer a blind spot to approaching traffic along the busy and fast B1527

Table 11.8: Likely Access Routes to the Sub-Sites

Site Area(s)	Main Access Routes*
National Grid Substation, 400kV Substation 1 and BESS	From the A140/B1134 roundabout: westbound on B1134 Station Road, northbound on agricultural access track.
1A – 1B	(Option A) From A140/B1134 roundabout: westbound on B1134 Station Road, northbound on Lodge Road and Frith Way – potential to require use in one direction or secondary access via the BESS Site; or (Option B) Internal access via the BESS Site, utilising existing access tracks where possible.
2A – 2C	(Option A) Access from A140 Norwich Road converting existing layby or identifying other suitable access point; or (Option B) From A140/B1134 roundabout: westbound on B1134 Station Road, northbound on Lodge Road and Frith Way – potential to require use in one direction or secondary access via BESS Site; or (Option C) Internal access via BESS Site and along the Cable Route Corridor (CRC).
3A – 3B	(Option A) From B1332 Norwich Road, westbound on B1527 Church Road, B1527 Hemphall Road, B1527 Bungay Road, southbound on Alburgh Road, Spring Lane, west onto sub-Site 3A or south on agricultural access track onto sub-Site 3B; or (Option B) Internal access via cable corridor from sub-Sites 5A and 5B.
4A	From A140/B1527 roundabout: off south-west exit of roundabout.
4B	(Option A) From A140/B1527 roundabout: eastbound on B1527, south onto the access point; (Option B) From A140/B1527 roundabout: eastbound on B1527, southbound on Brick Kiln Lane, westbound on the agricultural access track or internal access along the CRC.
5A – 5B	From A140/B1527 roundabout: eastbound on B1527, south onto the access point.



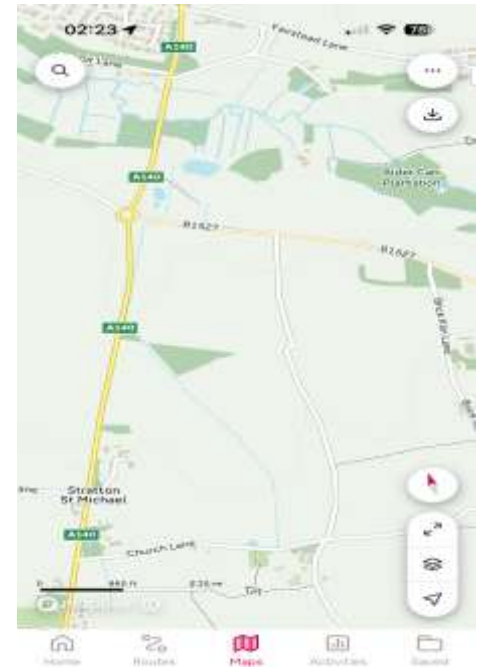
Access Track

Access to Sub-Site 4B will be via Long Stratton PRow 3 New internal access tracks are likely to be a maximum of 6m wide, constructed of hardcore or gravel over a leveling layer of substrate. Where required, drainage will be implemented to

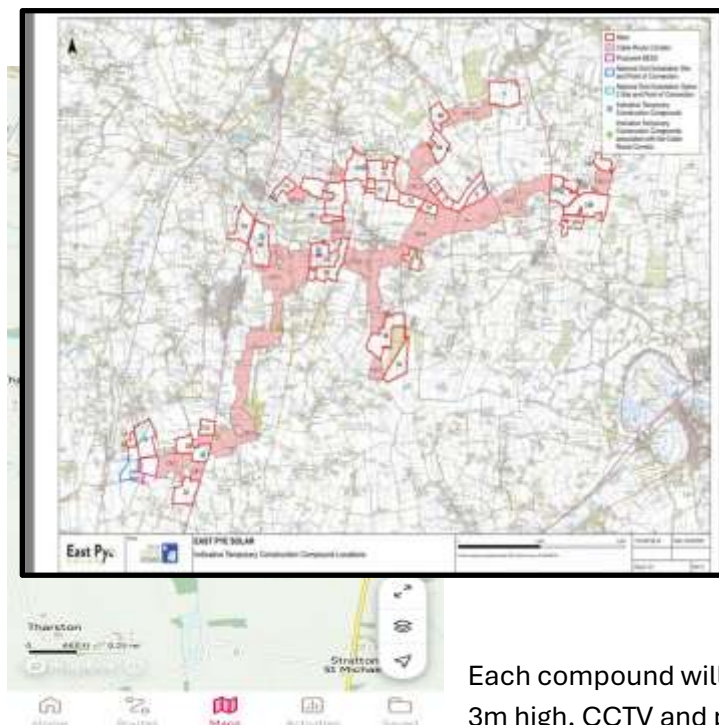
control any surface water run-off (East Pye Solar, PIER June 2025)

With an unnamed water course dissecting 4B flowing towards the Tas valley any runoff from surface water could enter the river Tas where highly protected crayfish have been found.

The same can be said for 4A where the land slopes towards Brand's Lane and further water courses attached to the river Tas are located.



CONSTRUCTION COMPOUNDS



A construction compound previously planned for 4B has now been located on the north boundary of sub-site 4A and will act also as a holding site for HGVs for site 7A-F although not part of the targeted consultation.

Sub-site 4A is considered a Primary Construction Compound meaning it would be one of the main construction hubs serving the solar scheme build-out.

The size of the Site 4A compounds is 1.7 hectares (4.2 acres)

Each compound will include portacabins at 3m high, fencing at 3m high, CCTV and poles at 3m high, surface water management infrastructure for run off management.

During the June 2025 online presentation, it was mentioned that no size is yet determined but 258 - 479 workers could be on site across the scheme on one day. Minibuses and coaches will be considered to transport workers in/off and around the site to reduce traffic to the roads and they would be working 7am-7pm Monday to Friday and 8am-1.30pm on Saturday.

The Cable Route Corridor 4 will have two official compounds plus another one in Hall Lane to receive the AIL which isn't labelled.

These CRC Compounds are 130m by 130m surrounded by security fencing and lighting.

The compounds will act as a holding depot as well as staff area.

Power Supply to Compounds

To facilitate construction, connection to the existing overhead power lines will be considered to provide power to the construction compounds where feasible. The compounds will be equipped with diesel generators where connection to power lines cannot be made.

Chapter 6: Climate Change

The EIA fails to provide a robust, site-specific assessment of the scheme's resilience to climate change and the potential for the development itself to exacerbate local climate risks.

There is no quantification or modelling of how the extensive area of solar panels may increase surface water runoff, exacerbate flash flooding, or alter groundwater recharge, particularly in light of climate projections for more intense rainfall events.

Nor does the EIA consider whether the introduction of large-scale hard infrastructure could lead to localised overheating, changes in wind patterns, or drought vulnerability affecting adjacent farmland and communities.

The absence of a detailed local climate risk assessment and adaptation strategy falls short of best practice and EN-1 requirements for demonstrating that both the project and surrounding communities will not be made more vulnerable as a result of the development.

Site 4 is currently a Climate Change Vulnerability Buffer area (MAGIC msp). East Pye Solar has provided no information about how their proposal will impact that status or what effect removing its status will have.

Site 4 is edged and contains ancient and historic hedgerows as well as trees recognised by The Woodland Trust as Veteran and Notable. With the planned removal of many of these hedgerows to gain access to Site 4 as well as internal construction within the Site, East Pye Solar have not supplied any calculations on the loss of this important carbon storage mechanism when compared to the proposed replanted newer hedge. Whilst it is recognised that younger plants in the years between 6-12 years old absorb and sequester more carbon than established mature hedges, it has not taken account of the large carbon quantities that have already been locked in both the plant and the soil by the mature vegetation and that by removing these established hedgerows will release that trapped carbon. Calculations based on the estimates of rates of Carbon uptake and storage of younger plants compared to mature hedging put the time span for a replacement young hedge to balance the loss of carbon capture and storage in the plants and the soil by the mature hedge at 60 to 100 years.

(Sci Total Environ 2023 Sep 20:892:164482. doi: 10.1016/j.scitotenv.2023.164482. Epub 2023 May 29. Planting hedgerows: Biomass carbon sequestration and contribution towards net-zero targets Sofia Biffi, Pippa J Chapman, Richard P Grayson, Guy Ziv,; Hedgerows increase soil carbon storage by 40%)

Site 4 is a current Climate Change Vulnerability Buffer area and as such it has been managed in a way in order to increase the resilience against the impacts of climate change by providing habitat corridors not only for smaller species but larger ones such as of Red and Roe deer who have been seen regularly crossing Site 4.

As part of this scheme, Site 4 has been managed to support long term biodiversity and ensure that wildlife habitats that have been connected for centuries remain so. Hedgerows have been maintained and encouraged, with wide margins left between planted crops and the boundaries as well as the natural watercourses dissecting sub-site 4B (that is marked as a drain on EPS maps) and feeds into the River Tas have been protected.

The Draft Development Consent order (APP/3.1) March 2026 Section 11, Part 1 and Part 2 (Removal of Hedgerows and Removal of Important Hedgerows) list vast swathes of hedgerows across the scheme planned for removal. However, what isn't clear is exactly how much of, for example, 'part of 601m of section 211 on Sub-site 4B' is actually to be removed. This vagueness will lead to catastrophic loss to established and important hedgerow as the Developer will have carte blanche on how much is removed. This vagueness is applied across the Scheme, and the length of hedgerow will be tens of kilometres.

In addition to the vagueness, if the Developer doesn't know how much significant hedgerow is being removed how can they calculate biodiversity net gain?

S-4B-190	Removal of part of approximately 460m of hedgerow within the area identified by a green line on sheet 17 of the hedgerow and tree protection order plan
S-4B-195	Removal of part of approximately 493m of hedgerow within the area identified by a green line on sheet 17 of the hedgerow and tree protection order plan
S-4B-211	Removal of part of approximately 601m of hedgerow within the area identified by a green line on sheet 17 of the hedgerow and tree protection order plan
S-7C-89	Removal of part of approximately 725m of hedgerow within the area identified by a green line on sheet 11 of the hedgerow and tree protection order plan
S-7C-91	Removal of part of approximately 121m of hedgerow within the area identified by a green line on sheet 11 of the hedgerow and tree protection order plan
S-5A-55	Removal of part of approximately 366m of hedgerow within the area identified by a green line on sheet 16 of the hedgerow and tree protection order plan
S-7A-87	Removal of part of approximately 370m of hedgerow within the area identified by a green line on sheet 12 of the hedgerow and tree protection order plan
S-5A-184	Removal of part of approximately 678m of hedgerow within the area identified by a green line on sheet 16 of the hedgerow and tree protection order plan
S-5B-43	Removal of part of approximately 493m of hedgerow within the area identified by a green line on sheet 16 of the hedgerow and tree protection order plan
S-5B-43	Removal of part of approximately 274m of hedgerow within the area identified by a green line on sheet 16 of the hedgerow and tree protection order plan
CRC4-308	Removal of part of approximately 601m of hedgerow within the area identified by a green line on the hedgerow and tree protection order plan
CRC4-309	Removal of part of approximately 101m of hedgerow within the area identified by a green line on sheet 5 of the hedgerow and tree protection order plan
S-1B-181	Removal of part of approximately 274m of hedgerow within the area identified by a green line on sheet 24 of the hedgerow and tree protection order plan
CRC4-310	Removal of part of approximately 150m of hedgerow within the area identified by a green line on sheet 18 of the hedgerow and tree protection order plan

Chapter 7: Landscape and Visual



Site 4 is situated within the parish of Long Stratton which is a mixture of residential settlement with outlying farming and small rural communities dotted across the parish.

Stratton is a common English place name that derives from the Saxon words *straet*: a Roman road, and *ton*: a group of farms.

Site 4 is significant to the setting of Long Stratton as it occupies the fields that acts as a buffer between settlement and countryside.

The long anticipated Long Stratton by-pass was completed in 2025 and allowed for controlled development and expansion within the boundaries of the by-pass preventing sprawl beyond it. Development to the west and south of Long Stratton have been refused for this very reason.

Site 4 occupies the area between the northern boundary of Long Stratton residential area and Tasburgh on the other side of the Tas valley.

Allowing the industrialisation of Site 4 would undermine the Long Stratton Neighbourhood Plan and risk not just industrialising the Tas river valley but also joining up Long Stratton with Tasburgh.

The surrounding area of Long Stratton sits within the South Norfolk and Upper Suffolk Claylands and is indicative of the natural mosaic of small, enclosed fields, supported by mature, significant hedgerows and small wooded areas. Quiet, single-track lanes allow local rural traffic to reach main transport routes north and south, east and west.

The landscape offers openness and a quiet rural environment with an agricultural heritage going back hundreds of years. The abundance of heritage buildings that supports the agricultural history of the area can still be seen within the Conservation Area of Long Stratton.

The applicant's own Landscape and Visual Impact Assessment acknowledges that significant adverse landscape and visual effects would occur within Site 4.

Whilst renewal energy development is recognised as an important component of national energy policy, that policy does not require significant landscape harm to be accepted where it has not been demonstrated that impacts have been avoided, minimised or adequately mitigated.

The principal issue is therefore not whether landscape change would occur, but whether the scale, duration and performance of that change has been justified and whether the environmental effects have been robustly assessed.

This chapter will demonstrate that the proposed development would result in the long-term industrialisation of a historically important rural landscape, causing significant adverse effects on landscape character, visual amenity, tranquility, recreational enjoyment and the historic field

patterns of South Norfolk. It further identifies shortcomings within the applicant's assessment that prevent the true extent of these impacts being properly understood.

7.1 Existing Landscape Character



The landscape surrounding Site 4 and the Cable Route Corridor is defined by its simplicity, openness and continuity.

Agricultural fields are enclosed by mature hedgerows and trees, creating a landscape that remains strongly influenced by its historic agricultural origins. Long distance views are available across gently undulating farmland, interrupted only by traditional farm buildings, woodland belts and occasional church towers, including the prominent setting of St Michael's Church at Stratton St Michael.

Unlike landscapes influenced by modern commercial or industrial development, this area retains a high degree of rural tranquillity.

Public Rights of Way, quiet lanes and minor roads enable residents and visitors to experience uninterrupted views across farmland with relatively few intrusive vertical structures. The absence of major infrastructure is a defining characteristic of the landscape. Telegraph poles carrying cables are the highest industrial infrastructure to Site 4, with the nearest pylon being over 4km to the West.

Trees and hedgerows perform an important role within this landscape. Beyond their ecological function, they define the historic field pattern, reinforce the area's distinctive rural character, provide visual containment and contribute to the gradual transition between settlements like Long Stratton and the surrounding countryside. Many hedgerows are identified as Important

Hedgerows, whilst small woodlands like Rackman's Wood within Site 4 and wild orchards offer purpose as a wildlife habitat, whilst spaced out rows of oak trees signify field boundaries and benefit from statutory protection through a Tree Preservation Order.



Rackmans Wood within sub-site 4B that acts as a natural habitat and feeding ground for much wildlife will be surrounded by panels and fencing making it inaccessible to all mammals. It also has an unofficial pathway that leads to the site potentially as a memorial site. This will be removed with no access available as surrounded by fencing.



Rackham's Wood is a significant nature area within open farmland on the proposed site of 4B accessible via a footpath. Herd of red deer are regularly seen around the wooded area.

These features are not isolated landscape elements but form an interconnected network that contributes to biodiversity, historic agricultural landscape character and visual amenity. Their retention is fundamental to maintaining the character of the area as well as their vital ecological habitat linkage.

The existing landscape also supports an extensive network of Public Rights of Way linking Morningthorpe, Hempnall, Fritton, Shelton, Long Stratton, Hardwick, Tasburgh and The Pulhams. These routes, including sections of the nationally recognised Boudicca Way and Via Beata Pilgrimage Walk, are widely used for walking, recreation and enjoyment of the countryside. Their value derives not only from continued public access but from the quality of the surrounding landscape through which they pass.

The landscape surrounding Site 4 therefore represents considerably more than agricultural land capable of accommodating solar infrastructure. It is a cohesive historic landscape whose value arises from the relationship between its field pattern, hedgerows, trees, settlements, heritage assets, open views and recreational network.

7.2 Significant Adverse Landscape Effects



Sunset over Site 4B

The Environmental Statement accepts that Site 4 would experience significant adverse landscape effects arising from the introduction of the proposed development. The applicant identifies a moderate magnitude of landscape change resulting in a moderate adverse significant effect on landscape character. This conclusion is important because it represents the applicant's own acknowledgement that the proposal would result in significant harm to the existing landscape.

The principal source of this harm is the replacement of an open agricultural landscape with extensive engineered infrastructure. Although the solar arrays occupy much of the site, they represent only one component of the development. The proposal also includes the 132kV Project Substation, electrical compounds, transformers, inverter stations, access road, security fencing, CCTV infrastructure and associated operational equipment. Collectively these elements

introduce a distinctly industrial character into a landscape presently defined by agriculture, openness and tranquillity.

The proposed 132kV Project Substation is of particular significance. Unlike the lower 4.5m profile of the solar arrays, the substation introduces substantial built infrastructure that cannot reasonably be regarded as characteristic of the existing landscape. Its scale, form and operational function fundamentally alter the rural character of Site 4 and create a permanent industrial feature within the countryside.

The applicant relies extensively upon mitigation planting to reduce these effects. However, the Environmental Statement acknowledges that the proposed landscape mitigation would require many years to establish before becoming effective. Significant adverse effects would therefore persist throughout at least the first fifteen years of operation that's assuming the mitigation planting has been looked after. Most aren't.

After the 15yr period the applicant is relying on to provide vegetational cover, the proposed mitigation cannot recreate the landscape that currently exists. The introduction of extensive native deciduous hedgerows and woodland belts would itself alter the defining characteristics of Site 4. The existing landscape is valued for its openness and long-distance views across agricultural land. **Replacing these views with continuous belts of screening vegetation does not restore the existing landscape character but creates an entirely different one.**

The proposed mitigation is therefore compensatory rather than restorative. It seeks to reduce visibility of the development by fundamentally changing the landscape within which the development is situated. This represents a permanent alteration to the historic agricultural character of Site 4 that would persist for the operational lifetime of the scheme and beyond.

The duration of these effects is also material. The proposed operational period is for 60 yrs, representing more than two generations. During this period the existing rural landscape would be unavailable in its current form to residents, visitors and future generations. This brings into question whether the Applicants claim of the temporary nature of the Development Consent Order really reflects the practicality and is in fact closer to a permanent change.

The applicant's own assessment therefore demonstrates that Site 4 would experience significant adverse landscape effects arising from the industrialisation of an historically agricultural landscape. The proposed mitigation neither avoids these effects nor restores the existing landscape character. Instead, it introduces further permanent landscape change in an attempt to reduce the visibility of infrastructure that remains fundamentally incompatible with the existing rural environment.

7.3 Visual Effects on Residents and Settlements

The Environmental Statement identifies several residential properties and publicly accessible locations surrounding Site 4 that would experience significant adverse visual effects as a result of the proposed development. These findings are not disputed by the applicant. Rather, the applicant's own assessment concludes that the introduction of extensive solar arrays, electrical infrastructure and the proposed 132kV Substation would result in major or moderate adverse visual effects for several sensitive receptors.

The most significant impacts occur where the development lies immediately adjacent to residential properties and Public Rights of Way. Existing views across open agricultural fields would be replaced by extensive engineering infrastructure comprising solar arrays, security fencing, inverter stations, transformers, access tracks and the proposed Substation. These are not features currently present within the landscape and would introduce an overtly industrial character into views presently defined by open landscape.

The images below are taken from **Church Lane** in front of Grade I Listed St Michael's Church, the Grade II* listed The Old Rectory and the Grade II listed The Old Rectory Barn which will be within metres of the Order boundary and with a rural outlook across open fields of proposed Site 4B.



*Grade I St Michael's Church, Stratton
St.Michael, Church Lane*

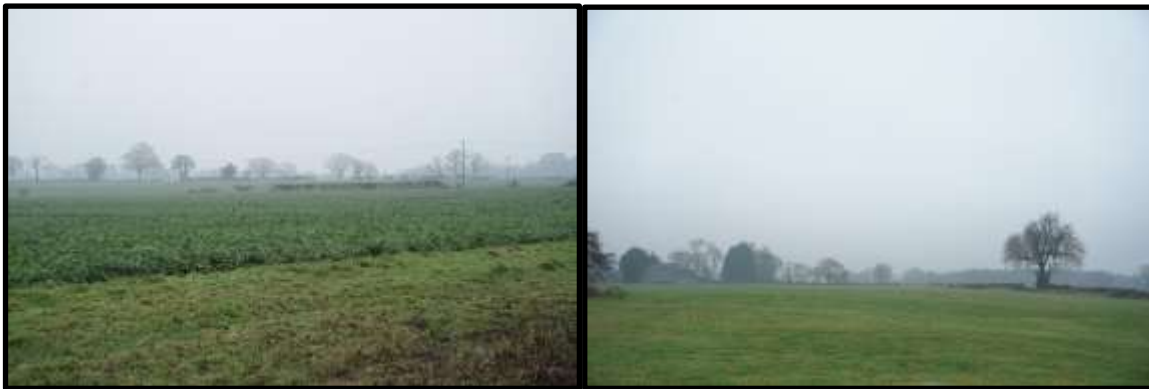
The front gate is 4m from the boundary of plot 4B and views are across the site on Church Lane.



View from The Old Rectory across site 4B has the front gate 4m from plot 4B on Church Lane



The Old Rectory Barn, Church Lane



Views from The Old Rectory Barn, Grade II Listed has a front view across Site 4B even on a wet and misty winters day and View from Church Lane across Site 4B to the cartilage of the Cedars



Document Visuals from in front of **Grade I listed St Michael's Church, Church Lane at Baseline level** showing openness and clear views.



Church Lane in front of Grade I Church of St Michael's with significant hedgerows and mature native trees signally field boundaries without enclosure.



The same view with the panels and fencing in full view.



The same view with panels and fencing in full view

17:19 Tue 23 Jun nspip-documents.planninginspectorate.gov.uk

23 of 34 tion Reference: Site 4-VL7

180° Horizontal field of view shown



Site Context Photograph (1 of 2)

This panorama is not to scale. For contextual information only.



90° Horizontal field of view

Latitude Longitude: 52°30'7.54"/ 1°10'11.88"	Date Taken: 24/06/2025	 Location Map (IN T1)
Direction: 41.2m AOD	Camera: Canon 40 (Full Frame Sensor)	
Notes: Southern view (5 of 3)	Lens: Sigma 50mm lens	
Visualisation Type: Baseline	Drawn By: MB	
Engagement Factor: 100%	Checked By: JL	
Projection: Cylindrical	Approved By: AC	

Project Number: 333101678
Project Name: East Pye Solar

ES Appendix: 7.6.5 Visualisations
Site 4

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East Pye SOLAR

Baseline images show openness across the fields from Brick Kiln Lane

17:19 Tue 23 Jun
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View Location Reference: Site 4-VL7

90° horizontal field of view extent



Site Context Photograph (1 of 2)

This panorama is not to scale. For contextual information only



90° Horizontal field of view

Latitude/Longitude: 41 2w AZD Summer view (1 of 3)	Date Taken: 04/06/2025 Camera: Canon 90 (Full Frame Sensor) Lens: Sigma 50mm	 Location Map (N.T.S.)
Visualisation Type: Photomontage Y/N Integration Factor: 100% Projection: Cylindrical	Drawn By: JL Checked By: JL Approved By: AC	
Project Number: 333101678 Project Name: East Pye Solar		

ES Appendix: 7.6.5 Visualisations
 Site 4

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East Pye
 SOLAR

Landscaping completely changes the openness and character of open fields

17:20 Tue 23 Jun 80%

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25 of 34
 Visitor Location Reference: Site 4-VL7

90° Horizontal field of view picture



Site Context Photograph (2 of 2) This panorama is not to scale. For contextual information only



90° Horizontal field of view

Latitude/ Longitude: 52°38'7.89" / 1°15'1.89" Elevation: 41.2m AOD Season: Summer view (2 of 5)	Date Taken: 24/06/2025 Camera: Canon M3 (Full Frame Sensor) Lens: 50mm f/1.8 lens	 © Crown copyright and database rights 2024 Ordnance Survey 100014711 East Pye SOLAR
Visualisation Type: Photomontage V1 18 Enlargement Factor: 100% Projection: Cylindrical	Drawn By: RL Checked By: JL Approved By: AC	
Project Number: 333101678 Project Name: East Pye Solar		

ES Appendix: 7 & 5 Visualisations
 Site 4

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Landscaping creates a feeling of enclosure and darkness.



Landscaping changes the openness of the fields and creates a feeling of enclosure and darkness. This clearly shows how **the proposal is making the landscape fit the Scheme instead of the Scheme fitting the landscape.**

The Environmental Statement also appears to place considerable reliance upon future growth of vegetation to reduce visual impact. All visual impressions are created with trees in leaf and at 15 years post planting. But for 6 months of the year trees and hedging will be leafless.



Hall Farm Solar is a small scheme with panels no more than 2.5-3m high. It is visible from over a mile away, offers glint and glare during sunny weather and even though it sits behind a line of mature trees it is still visible across the open countryside during the winter (leafless) months.



Natural and mature, important hedges can't offer screening during the winter months when they are leafless.

Mitigation screening takes many years to mature, assuming it hasn't died which is often the case, during which significant adverse effects remain. Furthermore, the proposed planting does not

recreate the existing landscape but replaces open agricultural views with dense belts of vegetation specifically designed to screen industrial development.

This fundamentally changes the character of the landscape experienced by residents.

The Cedars on Norwich Road is a Grade II listed farmhouse with outbuildings now converted into residential homes and that fall under the curtilage of the Cedars. The homes share a boundary with the farmland proposed for site 4B and have no clear perimeter between residential sites and open fields.

The properties are sandwiched between sub-sites 4A and 4B with the A140 the only boundary.

Although a buffer zone and reduction have been applied to some areas of sub-site 4B, it doesn't go far enough as panels will still be at **the boundary of the curtilage of The Cedars at the rear (less than 25m at the back) and 50m at the front. Shrubland's, a residential home in Brand's Lane is 100m away.**

Nor does the buffer zone consider the view from upstairs windows, like The Cedars.

The Applicants' own documents don't bother to look at the real visual effects from the homes in direct impact at the front and back, whilst the only ones that includes The Cedars are taken **300m away from sub-site 4A rather than from the curtilage of the Cedars which is 50m away from sub-site 4A and on the boundary of sub-site 4B.**

This undermines the real impact to these listed homes and does not represent the true visual effect the scheme will have on the relationship between these homes and the surrounding landscape.



First listed in 1951, the Cedars Farmhouse has open boundaries to the land of site 4B which was once part of Cedar's Farm.



Open views across agricultural fields to the east of The Cedars with no hard edging or screening.



The Cedars looking north and west over from upstairs of the property across open farmland proposed for panels on plot 4A. Glint and glare will be unavoidable and cannot be mitigated against.



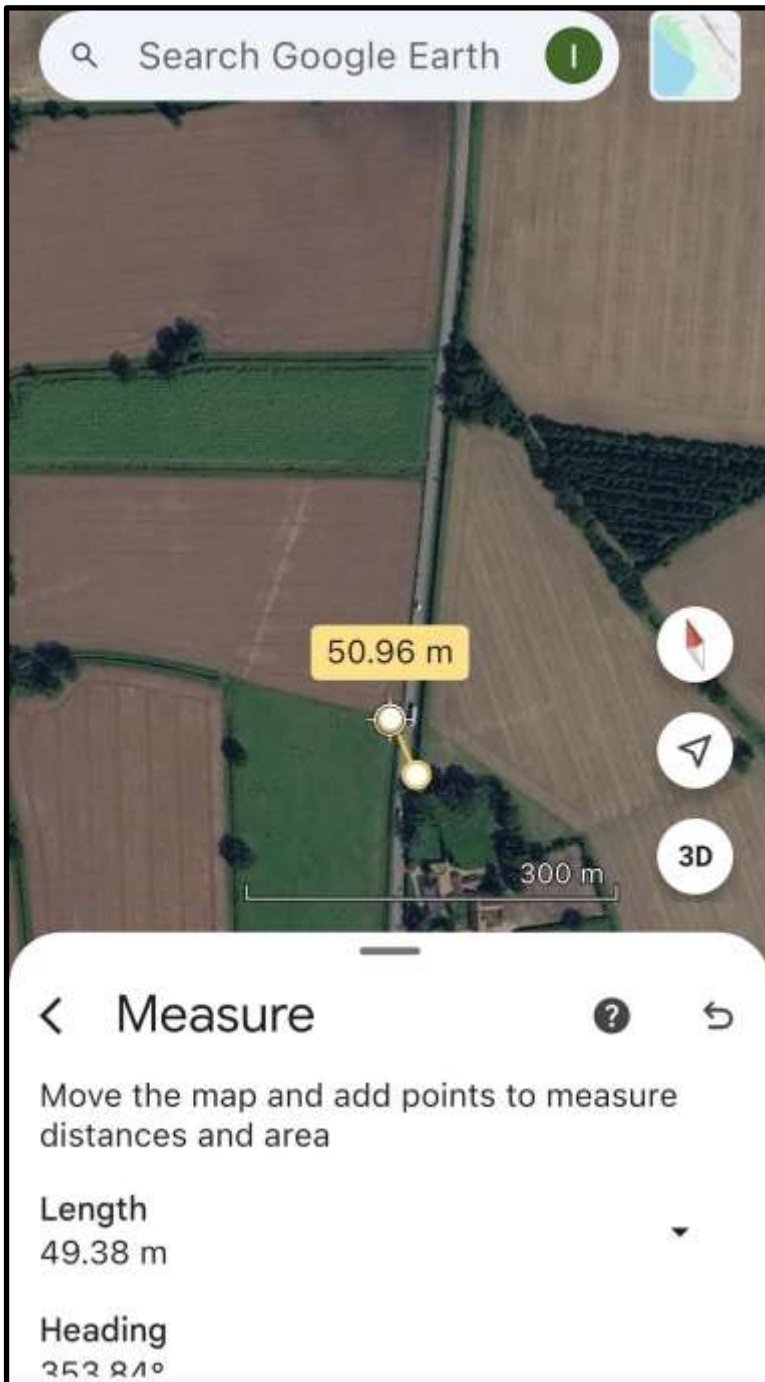
The Cedars looking west across site 4A from upstairs of the property



The Dairy Barn, with no hard boundaries between cartilage and countryside



The Applicant images were taken 300m away using wide angle



The Cedars are 50m away from sub-site 4A

33 of 34
 tion Reference: Site 4-VL11

Site Context Photograph

This prewriting is not to scale. For contextual information, visit



60° Horizontal field of view

Latitude/Longitude:	52°29'55.8N / 1°14'29.64E
Elevation:	41.3m AOD
Season:	Winter (Nov. 1 of '2)

Date Taken	14/01/2025
Camera	Canon M3 (Full Frame Sensor)
Lens	Sigma 85mm lens

Visualization Type:	Baseline
Enlargement Factor:	100%
Projection:	Cylindrical

Drawn By	MS
Checked By	JL
Approved By	AC



Project Number: 333101678
Project Name: East Pye Solar

ES Appendix: 7.6.5 Visualisations
Site 4

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East Pye
SOLAR

17:21 Tue 23 Jun
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32 of 34
Location Reference: Site 4-VL11

90° Horizontal field of view visible

Site Context Photograph

This panorama is not to scale. For contextual information only

90° Horizontal field of view

Latitude/Longitude: 52°29'54.86" / 1°58'39.64" Elevation: 41.3m AOD View: West (2 of 2)	Date Taken: 14/01/2025 Camera: Canon EOS R5 (Full Frame Sensor) Lens: Sigma 28mm f/1.8	Location Map (N.T.S.)
Visualisation Type: Baseline Enlargement Factor: 100% Projection: Cylindrical	Drawn By: J.L. Checked By: A.C.	
Project Number: 333101678 Project Name: East Pye Solar	ES Appendix: 7.6.5 Visualisations Site 4	

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East Pye SOLAR

Baseline images are 300m away from sub-site 4A

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85%

33 of 34

Location Reference: Site 4-VL11

90° Horizontal field of view extent

Site Context Photograph

This panorama is not to scale. For contextual information only.

90° Horizontal field of view

Latitude/ Longitude:	51°29'36.88\"/>
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Date Taken:	14/01/2025
Camera:	Canon 6D (Full Frame Sensor)
Lens:	50mm f/2.8 lens

Visualisation Type:	Photorealistic	Drawn By:	RL
Exaggeration Factor:	100%	Checked By:	JA
Projection:	Cylindrical	Approved By:	AC

Project Number: 333101678

Project Name: East Pye Solar

ES Appendix: 7.6.5 Visualisations

Site 4

This photo sheet should be printed in A1 and

runed at a comfortable user's length.

East Pye

SOLAR



The images including sub-site 4A are wide angle and 300m away from sub-site 4A

The visual effects experienced by nearby residents should not be considered solely in terms of visibility. Residential visual amenity is derived from the overall quality, character and composition of the surrounding landscape. The replacement of open countryside with extensive industrial infrastructure fundamentally alters that relationship for the duration of the scheme.

The Secretary of State commented on the **Botley West report** that:

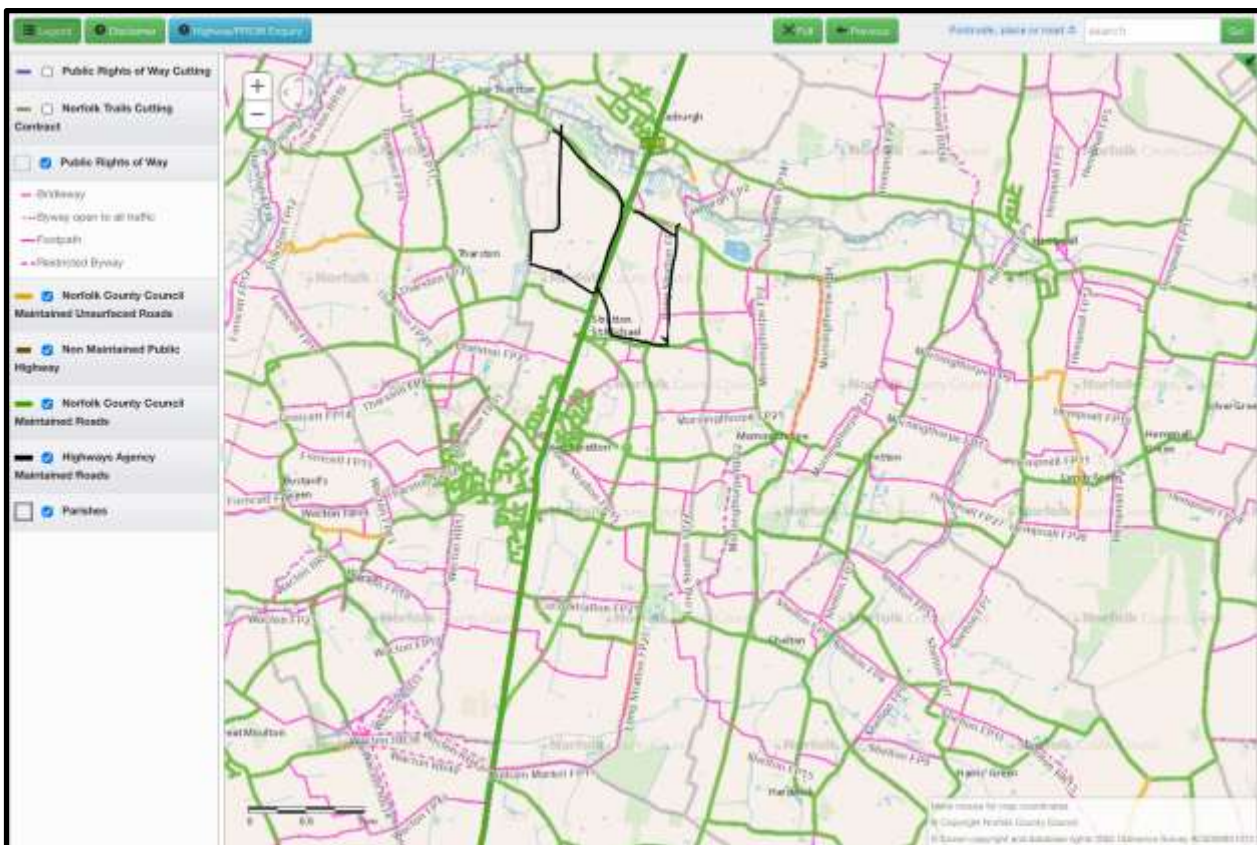
- 'a buffer of 250m should be implemented between the edge of any part of the proposed operational solar array and any residential dwelling house (as measured from the curtilage of any private residential property or address);
- It is requested to confirm whether a property-by-property assessment is feasible on all dwellings within a 250m of the edge of any part of the proposed operational solar array;
- To provide assessment, identifying the dwellings considered and the criteria used to select them;

- Explain the likely visual impact effects of the development on each property;
- Identify any mitigation measures (including buffer distances or layout changes) that could reduce the effect.

If the applicant can't provide an assessment, then justification of no such approach.'

Considering the colossal impact to so many properties across the scheme, Listed and not listed, the same request to **Botley West** should be put to East Pye Solar across the whole of the scheme, as the approach would have quite significant impacts on many sites, including Site 4, and making the Site's viability questionable.

7.4 Public Rights of Way, Recreation and Tranquillity



Map adapted from the Norfolk County Council Highways to show position of Site 4

The visual shows the volume of Footpaths, Restricted Byways and Bridleways across Site 4 and the Cable Route Corridor 4 which joins site 2C which is in the bottom left corner of the image.

One of the principal shortcomings of the Landscape and Visual Impact Assessment is its treatment of the Public Rights of Way network surrounding Site 4 and the CRC4.

The assessment considers individual viewpoints and isolated receptor locations but gives insufficient consideration to the cumulative recreational experience of users travelling through the extensive connected network of footpaths, byways and bridleways surrounding the Site and across CRC4.

On Site 4, both footpaths will be closed for the duration of the construction, as will most of the network across CRC4. However, **the planning issue is not whether PRoWs remain open but whether the experience of using those routes is fundamentally altered by the introduction of large-scale electricity infrastructure.**



Morningthorpe FP23 that leads to RB22 which will be closed



Long Stratton FP17 which will lead to Morningthorpe FP23 but will be blocked off with CRC4 construction



Morningthorpe Footpath 23 as part of a broader network, showing mature hedgerow and small wooded areas with open views across countryside

The impact of the shortcoming does not just impact one Footpath but a network of Footpaths and Bridleways and in turn the cumulative experience across the network as a whole.

Residents and visitors commonly use these routes as circular walks linking neighbouring villages and connecting with Boudicca Way. Users would therefore experience successive views of extensive solar arrays, security fencing, electrical infrastructure and the proposed Substation on Site 4 which will sit alongside Long Stratton Footpath 3 when it reopens and will be clearly visible from LS4 and Tasburgh2.

The character of a walking route would be fundamentally different from that experience today and the Environmental Statement does not adequately assess this sequential experience.

Health and well-being has not included the risk to women that at present can safely walk alone, with open views and potential 'escape routes' if at risk.

As a woman that uses these footpaths daily, I feel safe and relaxed. Having spent 40 years of my adult life 'Risk Assessing' my walking routes in London; where to walk, when to walk, what's the lighting like, where does the route pass, 'escape routes', where to go if I feel at risk and so on. A sub-conscious tick box list. I have not had to do much of that since choosing to move to my rural home. I can just walk. I can see who is ahead or behind me and I have no barriers. That list doesn't apply. But it will if the scheme is consented. Fencing on one or even two sides of a footpath, enclosed views, blocked views, restricted escape routes, noise that isn't there now will even muffle shouts for help.

That could be women walking dogs, out on their own, mums walking to and from school with children, young people, the elderly, walking groups, horse riders etc.

No man sub-consciously risk assesses their route.

The Boudicca Way and Via Beata are particularly sensitive. Both recognised as long distance recreational routes and both will be impacted by the scheme in multiple locations including several locations along the Cable Route Corridor 4. As the Boudicca Way goes north to south whilst the Via Beata goes East to West with the latter will be impacted again at the southern cluster of sites.

Both walking routes' value derives from the experience of travelling through open Norfolk countryside. Users would therefore encounter repeated sections of extensive solar arrays, security fencing and associated electrical infrastructure throughout a single journey, substantially diminishing the qualities that make the routes attractive.

The proposal would therefore not just diminish the visual amenity but the recreational value of the wider Public Rights of Way.



Other means of enjoying the beauty of the South Norfolk countryside

7.5 Trees, Important Hedgerows and Historic Landscape Pattern

Trees and hedgerows are among one of the defining characteristics of the area including Site 4 and CRC4. They perform functions that extend well beyond ecology; contributing to landscape character, historic field enclosure, visual amenity, ecological connectivity and the transition between settlements and the surrounding countryside. Collectively they form an established network of mature landscape features that has evolved over centuries and underpins the distinctive rural character of this part of South Norfolk.

The Applicant places considerable reliance upon the retention of existing hedgerows as a principle mitigation measure. However, the application documents do not provide robust clarity to establish precisely which hedgerows would be retained, which would be breached and the extent of any permanent losses. This uncertainty significantly undermines confidence in both the

Landscape and Visual Impact Assessment and the ecological assessment.

How can biodiversity net gain be properly assessed and calculated when there is no specific plan?

Lack of Certainty Regarding Important Hedgerow Removal

Throughout the Environmental Statement the Applicant states that no more than 10 meters of Important Hedgerows would be removed where access or infrastructure crossings are required.

However, the submitted drawings do not identify the precise locations of those removals or explain how the stated figure has been derived.

The hedgerow network across Site 4 and the Cabling corridor is a defining element of the historic agricultural landscape.

These mature boundaries have evolved over centuries and continue to define the pattern of fields surrounding Long Stratton. Their importance extends beyond biodiversity, providing visual structure, enclosure, orientation and continuity within the landscape.

Repeated breaches to facilitate access roads, cable routes and electrical infrastructure would progressively erode this historic field pattern. Even where individual losses appear limited in isolation, their cumulative effect across the site and CRC would permanently weaken the coherence of the existing landscape.

The Environmental Statement gives insufficient consideration to the cumulative erosion of historical landscape character.



View across Site 4B and Site 4A in the background even on a dull misty January afternoon. The only and tallest industrialised infrastructure are the subtle lines of telegraph poles carrying overhead electricity to rural properties. This line was supporting a Song Thrush as it sung to the world.

7.6 Limitations of the Zone of Theoretical Visibility Assessment

The Zone of Theoretical Visibility (ZTV) plans contained within Environmental Statement Volume 2, Figure 7.5.6, provide a useful indication of the potential extent of visibility. However, several aspects of their presentation limit their usefulness in understanding the likely visual effects arising from Site 4.

The Applicant has prepared the Digital Surface Model (DSM), Digital Terrain Model (DTM) and Graded DSM using an observer height of approximately 1.5–1.6 metres above ground level. Whilst this is consistent with the residential assessment methodology, it does not reflect views available from upper storeys of nearby dwellings or from other elevated viewing locations.

The ZTVs have also been artificially clipped, with the Graded DSM limited to 3 kilometres and the combined DSM/DTM limited to 5 kilometres from the site.

As a consequence, the plans do not illustrate the full theoretical extent of visibility beyond these arbitrary boundaries. The absence of mapped visibility outside the clipped area should not be interpreted as indicating that no visibility exists. Rather, the Applicant has simply chosen not to display it.

This presentation risks understating the geographical extent over which the proposed infrastructure may influence the surrounding landscape.

The issue becomes more significant when considered alongside the wider East Pye Solar Scheme. Site 4 does not exist in isolation but forms part of a much larger development extending across a substantial area of South Norfolk.

The clipped ZTVs therefore provide only a partial understanding of the visual influence of the overall scheme and do not adequately demonstrate how visibility extends across the wider landscape when the cumulative effects of the different sites are considered together.

7.7 Representative Viewpoints and the Lived Experience

Whilst representative viewpoints are an accepted component of Landscape and Visual Impact Assessment, they inevitably provide only a series of individual snapshots taken from selected locations.

The experience of residents and visitors is fundamentally different.

People living within the affected area experience the landscape continuously rather than from isolated viewpoints. Residents travel between neighbouring villages, use local roads on a daily basis, walk the interconnected Public Rights of Way network and experience changing views throughout the seasons and at different times of day.

Similarly, visitors and tourists travelling through South Norfolk experience the landscape as a connected whole rather than as a sequence of predetermined assessment locations.

This distinction is particularly important for the East Pye Solar Scheme because of its geographical extent. The development extends for around 16 kilometres from its north-eastern to south-western extremities. Residents living within this area would not experience the effects of a single site in isolation but would encounter different elements of the scheme repeatedly as they travel through the local road network and surrounding countryside.

The cumulative visual experience of extensive solar arrays, substations and associated electricity infrastructure across multiple sites is therefore likely to be substantially greater than is suggested by consideration of individual viewpoints or clipped ZTV plans alone.

The Landscape and Visual Impact Assessment does not adequately reflect this lived experience. By focusing primarily on selected viewpoints and standardised visibility modelling, the assessment understates the cumulative effect of repeatedly encountering large-scale energy infrastructure across a wide rural landscape

Conclusion

The applicant's own Landscape and Visual Impact Assessment acknowledges that the proposed development would result in significant adverse landscape and visual effects within Site 4 and the Cable Route Corridor 4. However, this chapter has identified a number of shortcomings that indicate those effects have been underestimated and that the assessment does not provide a sufficiently robust understanding of the likely impacts.

In particular, the assessment:

- Relies heavily on existing hedgerows and proposed planting to reduce the visibility of the development, despite this permanently altering the character of the existing landscape rather demonstrating that the development has been designed to fit within it;
- Understates the effects on the nearby residents, with omissions from the residential receptor assessment, separation distances measured to dwelling footprints rather than residential curtilage, and no meaningful consideration of views from upper storeys or the way residents experience their homes and gardens;

- Fails to fully assess the cumulative recreational experience of users of the Public Rights of Way network;
- Relies on visibility modelling that is constrained by clipped ZTVs, potentially understating the wider visual influence of Site 4 and the cumulative effects of the wider East Pye Solar Scheme;
- Contains uncertainty regarding the extent of the impacts on 'Significant Hedgerows' and protected trees, undermining confidence in both the landscape and ecological assessments.

Taken together, these matters demonstrate that the Applicant has not shown that the likely significant effects on landscape character, visual amenity, tranquillity and the wider rural environment have been fully assessed or adequately mitigated. Consequently, the conclusions of Landscape and Visual Impact Assessment should be afforded limited weight.





This field is at Parkers Lane, Wood Green on CRC4 and PRow Long Stratton19. It is growing maize now and last year grew sugar beet. It is contract farmed, hosts multiple footpaths, has several Roadside Nature Reserves and mature trees that are the perfect habitat for endangered songbirds including a yellowhammer singing here just last week. It has a drainage ditch 3 meters deep as it floods in winter especially where the AIL is planning to enter it from Hall Lane on the **unofficial compound**.

This will be removed for two years during the construction of CRC4 which will border the homes and farmhouses in Parker's Lane, Hall Lane and Mill Road. Parker's Lane will be closed at times even though it is the only route in and out to residents of Wood Green West.

Chapter 8: Ecology and Biodiversity

Overview

The South Norfolk Claylands

The area is part of the **National Character Area 83 South Norfolk and Upper Suffolk Claylands** which have been managed to keep their own particular character, where pockets of relatively well-preserved countryside have survived.

The local landscape has distinctive characteristics different from other parts of Norfolk.

These have arrived because of the way that people have interacted with the natural environment over centuries. These characteristics allow a **sense of place that is intimately bound up with the character of the countryside.**

The unique landscape has been subject to land management changes with increased development having a detrimental effect on the wildlife and the vital habitats that it depends upon.

Sites 4A and 4B fall into the South Norfolk Claylands.

The construction of solar arrays at sites 4A and 4B plus a 132kV substation on 4B, a construction and holding compound on 4A, and access routes across both sites will all have a detrimental effect on the character and wildlife.

The CRC4 is the longest cabling corridor across the scheme measuring approximately 8km and at present acts as a wildlife corridor due to its patchwork fields, each surrounded by mature hedgerows and tree lines, all quite typical of the topography of the area. These fields support much wildlife, undisturbed, including herds of native deer, hares, redlisted birds and bats.

Dark Skies

Norfolk is one of England's most rural counties, and its dark landscapes and dark skies are defining part of its rural character, deserving protection. Yet this special quality is under threat. Light pollution is caused by poorly designed or unnecessary light shining tastefully where it is not needed and it is increasing (CPRE Norfolk).

Much of the area for the East Pye Solar Scheme, away from settlements, are some of the darkest skies in Norfolk. Many people visit the area to star gaze including at Wood Green adjacent to CRC4, and the Northern Lights are regularly photographed from the area. Dark Skies support many nocturnal animals including multiple bat species, particularly the Barbastelle.

The lighting of compounds and construction areas as well as security lighting surrounding substations will have a cumulative impact on the Dark Skies across the area.



Northern Lights with the moon and stars across Cable Route 4.

If the Scheme was consented, this picture would have the Cabling Compound 2 200m away in the foreground, with 132kV Substation and Sub-site 4B to the centre right and Sub-site 4A with the holding compound below the crescent moon (centre left).



Northern Lights across Cable Route 4

The **serotine bat (*nephaeus serpentinus*)** has been recorded as being present on site 4B and this is a species that has declined in many areas of its European range. Loss of feeding habitat

is thought to have played a part in this. It is highly vulnerable to disturbances from construction work and toxic timber treatments.

They have three main feeding strategies: short flights, ground feeding and aerial hawking. It normally forages quite low, 0-5m above the ground. In the UK serotine bats benefit from a very comprehensive level of legal protection.

All bird species will be disturbed by this level of intrusion into their habitat.

Part of the sub-sites 4A and 4B lie within an area of Habitat Restoration-Creation (East Pye Solar EIA scoping report 01/25).



The State of Nature report shows that much of the wildlife in the UK is in serious trouble:

- 1,500 species are now at risk of being completely lost.

- 43% of birds,
- 31% of amphibians and reptiles,
- 28% of fungi and lichens
- 26% of land mammals (State of Nature Partnership 2023).

Many threatened birds with declining numbers are found across the surrounding farmland surrounding Long Stratton, in hedgerows, wooded areas and ground nesting.

Red Listed Birds:

- Lapwing
- Swift (nesting)
- Linnet
- Fieldfare
- Grey Partridge
- Skylark
- Greenfinch
- House Sparrow
- Mistle Thrush
- Herring Gull
- Turtle Dove
- Yellow Hammer
- Starling
- Spotted Flycatcher

Amber listed Birds:

- Wood Pigeon
- Tawny Owl
- Rook
- Wren
- Song Thrush
- Bullfinch
- Sparrow Hawk
- Kestrel
- Mallard
- Stock Dove
- Moorhen
- Black-headed Gull
- Common Gull
- Common Whitethroat
- Redwing
- Dunnock

New research from China has now demonstrated that utility scale solar changes habitats, ecology and reduces bird diversity. The research recommends that utility scale solar is built on deserts to avoid ecological harm.

https://www.science.org/doi/10.1126/science.aee0747?fbclid=IwDGRleAUKI4FwZG9mBWZkaWQWUN4n9XfME8-fOhXM6IEEvRMwTfUJ-GV4dG4DYWVtAjExAHNyDGMGYXBwX2lkCjY2Mjg1NjgzNzkAAR5Zlo43d5yh9iysi9m-mlkUF-rL2t-WP_bYKJWnFKppu1iyR6nEfbaMiONcvg_aem_pnf1J0VO8KUMfbLjVzslDw

Gamebirds including grey partridge and pheasants are known to nest in the area and are used for game shooting events by the landowner of Site 4.

Yellow wagtails often nest in ground-level grass in damper areas, meadows and agricultural fields.

All wild birds and their nests are protected under the Wildlife and Countryside Act 1981 which makes it illegal to intentionally damage or destroy an active nest.

East Pye Solar intends to build on this type of breeding habitat and construction will take several years. Therefore the birds breeding sites will be destroyed and disturbed. This cannot be mitigated against.

Many mammals are resident across these sites including:

- Red deer
- Roe deer
- Muntjac
- Chinese Water Deer
- Hare
- Barbestrelle Bats
- Pipistrelle Bats
- Soprano Bats
- Natterers Bats
- Brown Long-Eared Bats
- Hedgehogs
- Stoats
- Otters in the Tas
- American mink
- Mole

8.1 Barbastelle Bats

Land Parcel 4 lies within a **Core Sustenance Zone (CSZ) for Barbastelle Bats**, linking it functionally to confirmed and likely maternity colonies within the wider Easy Pye landscape. CSZ land is essential for foraging, commuting and maintaining breeding success.

The proposed development would introduce:

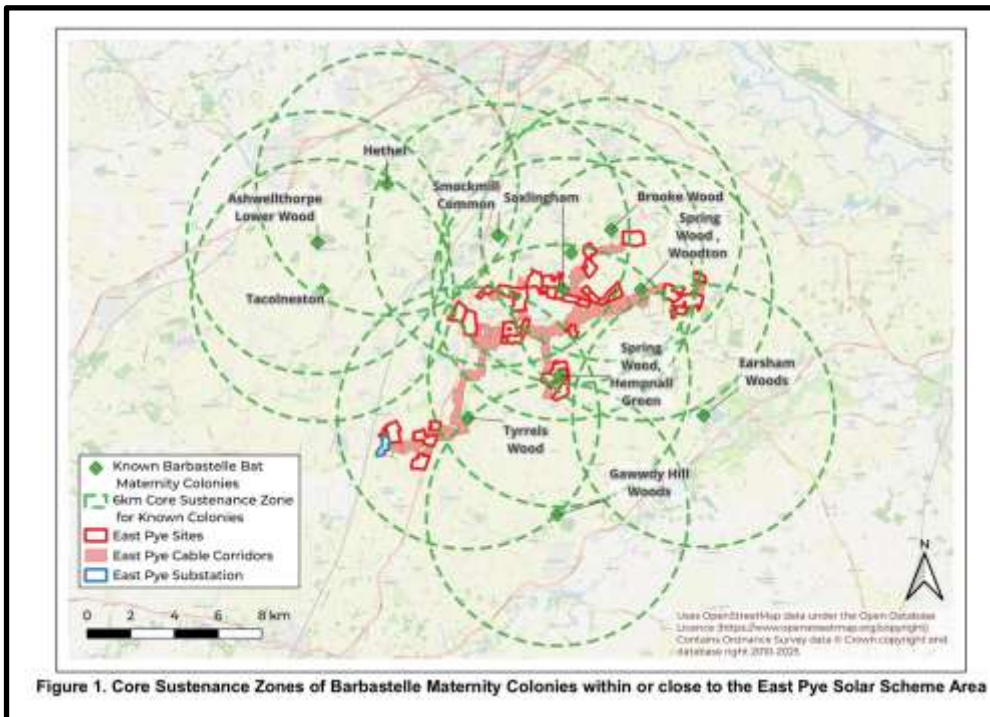
- Extensive arrays and fencing;
- lighting, CCTV and inverter infrastructure;
- prolonged construction disturbance;
- loss and fragmentation of functionality linked habitat.

On this basis, **disturbance or damage to breeding and resting places cannot be excluded**, and the works would be **likely to require a European Protected Species licence**. The application provides **no lawful assessment of licence need or grantability**, and no evidence that the statutory tests (including maintenance of favourable conservation status at landscape scale) could be met.

Given the **cumulative CSZ overlap across multiple parcels**, this represents a **front-loaded legal constraint** rendering Land Parcel 4 **undeliverable in principle**.

Where a proposed NSIP is located wholly 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.



The Barbastelle Bat is distinctive, elusive and very rare with big ears that meet in the middle and a flat pug-like nose. They live in deciduous woodland and like to hunt in wet woodland and meadow areas and environment very significant to that across the East Pye Solar Scheme.

Barbastelle bats enjoy a diet of moths, midges and beetles, which they hunt at night using echolocation. They hunt in a variety of habitats, particularly over water, and have a quick and skilful flight.

Echolocation is a way of sending out an acoustic call towards a smooth surface, like a pond, the sound bounces off the body of water. A new study in the UK has detailed how bats are confusing the smooth surfaces of solar panels for bodies of water.

With the tracking panels being at 0 degrees (horizontal) at night as they reset themselves this could be catastrophic for the colonies of foraging maternity bats.



They breed in the autumn although pregnancy is delayed until the rolling spring when nursery roosts and maternity colonies are formed. These usually consist of around 10-20 females and typically give birth to one or two pups in July.

Barbastrelle Bats hibernate in the winter months often in old buildings and holes in trees. During mild spells they may head about to forage.

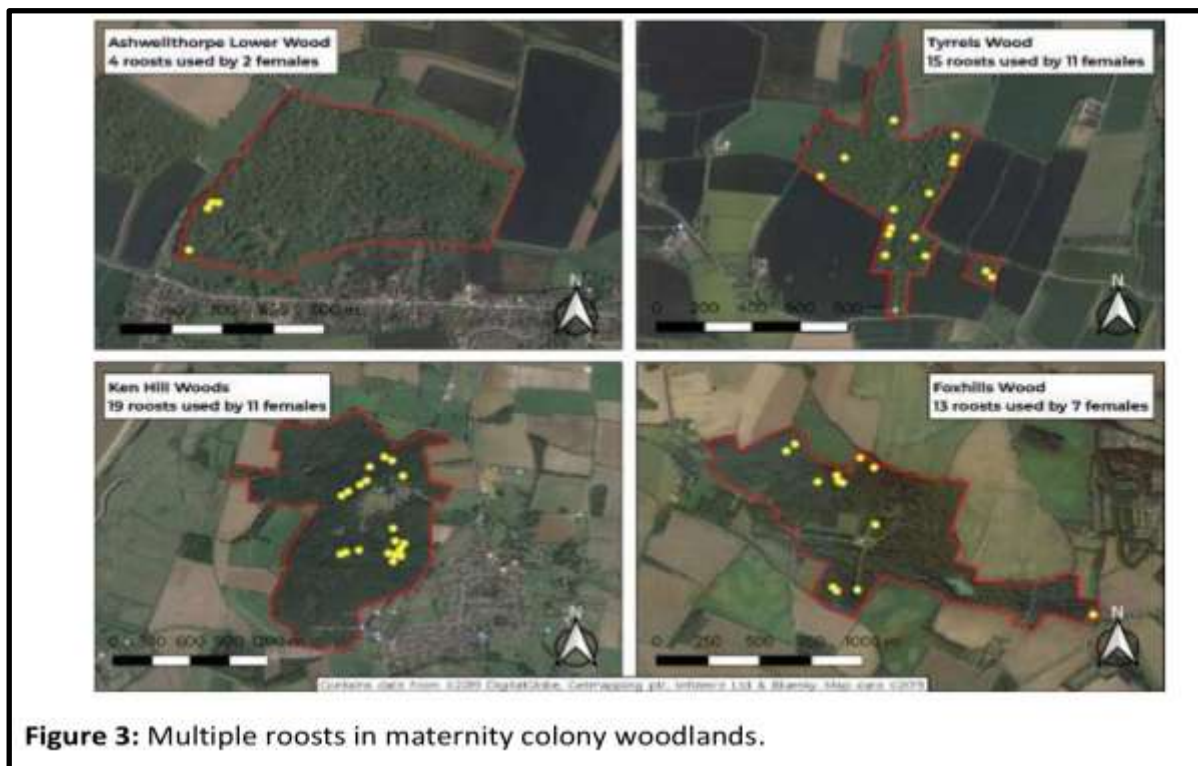


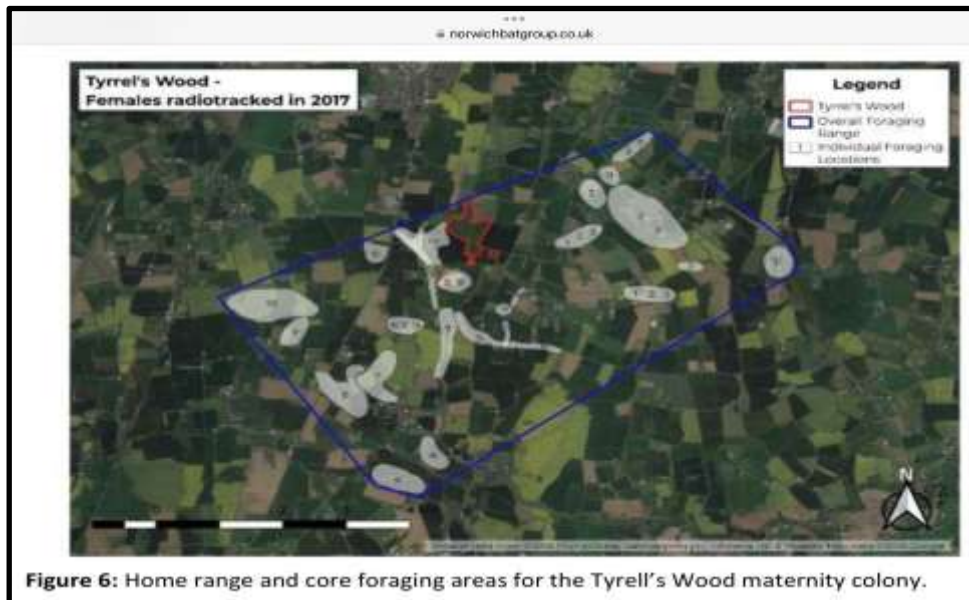
They live in deciduous woodland and areas with water, like woodland streams and ponds.

Barbastelle Bats are incredibly rare and protected under the Wildlife and Countryside Act 1981. It is also listed as Near Threatened globally on the IUCN Red List. They are thought to as few as 5,000 in the UK.

South Norfolk is incredibly significant for Barbastelle Bats because it sits within a UK stronghold for this critically endangered, near-threatened mammal. There are twelve known maternity colonies surrounding and across the East Pye Solar Scheme each with a 6km Core Sustenance Zone radius for foraging. The region's mosaic of ancient woodlands, traditional hedgerows and quiet river valleys of the Claylands provides vital foraging and maternity habitats.

The Norwich Bat Group studied one of the maternity colonies at Tyrrels Wood, managed by the Woodland Trust which is also part classified as 'ancient'. It is the home to 15 roosts. The Norwich Bat Group were able to radio-track 11 females within the roosts. Four females foraged to the east, three to the west, crossing the A140. Three bats remained within 3km of the wood.





norwichbatgroup.co.uk

Home ranges
Home ranges were calculated for the most intensively tracked maternity colonies (Table 1). As expected, colony home range increased with the number of bats tracked, and is likely to be underestimated. The maximum distance travelled from the roost woodland averaged 3.5km with no bats travelling more than 5.5km. This is perhaps surprising for a wide-ranging fast-flying species, but females still in their maternity groups may range less widely than non-breeding females or males.

Table 1: Individual and colony home ranges (minimum and maximum values in parentheses).

Maternity colony	Number of females tracked	Mean individual home range (ha)	Colony home range (ha)	*Mean-maximum foraging radius (km)
Paston Great Barn	7	460 (208 – 755)	1,709	3.5 (2.1 – 4.0)
Old Hills Woods	5	532 (260 – 720)	1,400	3.4 (4.9 – 4.2)
Foxhills Woods	5	427 (353 – 577)	1,253	3.0 (2.2 – 3.8)
Tyrell's Wood	11	388 (172 – 677)	3,447	3.7 (2.3 – 5.4)

*Maximum foraging radius is measured from roost cluster or centre of roost woodland

Norwich Bat Group

<https://www.norwichbatgroup.co.uk/wp-content/uploads/Harris-J.-2020.-Barbastelle-review.-British-Islands-Bats-1-33-48.pdf>

The 6km Core Sustenance Zones for Barbastelle Bats overlap each other and cover the whole of the Scheme Order Limits including Site 4

This cannot be mitigated against and is a FATAL Flaw.

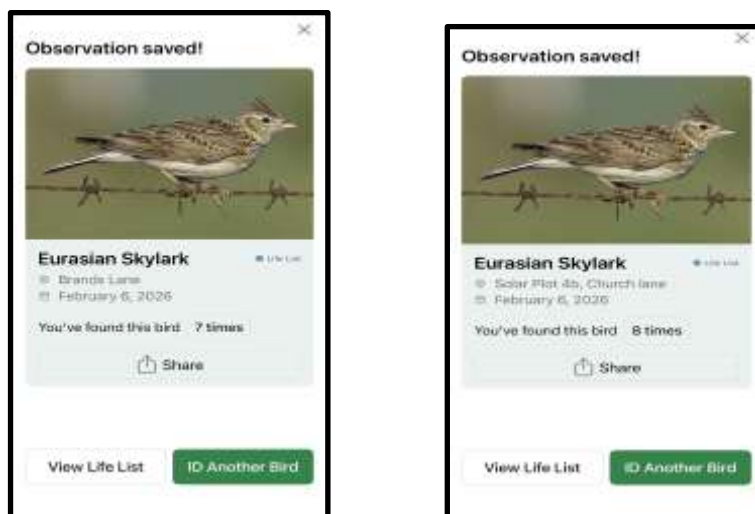
8.2 Skylarks

Skylarks are ground nesting birds commonly in open farmland, pastures and grassy fields like those surrounding Long Stratton at sites 4a & b as well as across the rest of the scheme.

Classified in the UK as Red under the Birds of Conservation Concern 5: the Red List for Birds (2025). <https://www.bto.org/sites/default/files/publications/bocc-5-a5-4pp-single-pages.pdf>

Male skylarks rise vertically from farmland, grassland etc to sing and parachute back down to earth.

Skylarks have been recorded on both sub sites at Brands Lane south of 4A and Church Lane, south of 4B



Species that require long, open sight lines - specifically Skylarks and Lapwings are often displaced by the physical presence of solar arrays. Skylarks rarely nest within the arrays because their view of predators is obstructed by the panels. Lapwings typically avoid nesting in fields with vertical structures like panels or high hedges.

Any mitigation measures put in place must be carefully managed and designed to specifications suitable for individual species to survive. (<https://www.cam.ac.uk/stories/solar-biodiversity-birds#:~:text=Birdlife%20soars%20on%20nature%2Dfriendly,individuals%20than%20surrounding%20arable%20land>. Centre for landscape regeneration, University of Cambridge, RSPB 13/2/25).

These birds are highly vulnerable to disturbances and organisations like Bird Aware Solent and the RSPB emphasise that adult birds will often desert nests if disturbed by dogs or walkers, leaving eggs or chicks vulnerable to cold or predators. Therefore, it can be extrapolated from this that heavy machinery and construction traffic would have a negative impact on these birds' nests too. (Norfolk

Wildlife Trust, RSPB, British Trust for Ornithology: The Norfolk Bird Atlas, Game & Wildlife Conservation Trust).

East Pye Solar considers only 81 breeding pairs have been found across the scheme, yet skylarks are actively heard and seen across all fields.

A skylark mitigation area has been included within Sub-site 4B which proves how valuable this site is to the protection of this endangered and protected bird. Removing 250 acres cannot be adequately mitigated by including 30 acres across four sites (approximately 7.5 acres per site).

8.3 Turtle Doves

The area around Tasburgh and Hempnall in South Norfolk is considered a prime, albeit rare, location for spotting the declining European turtle dove (*Streptopelia turtur*).

Given their scarcity, the best chance of spotting them is in the early morning in early summer, listening for their distinctive "purring" song.

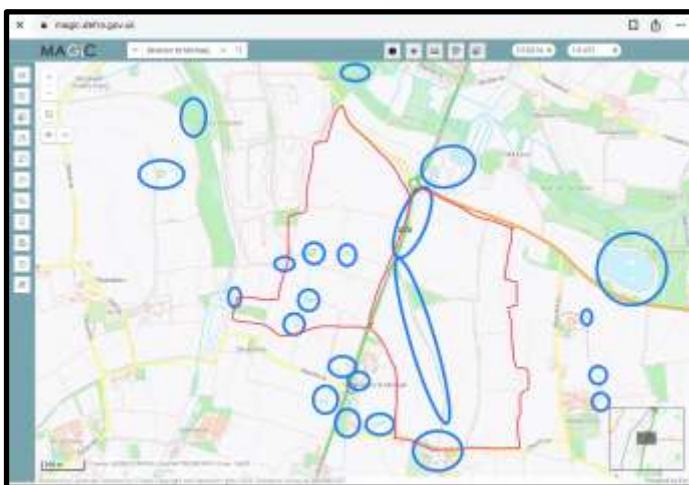
Turtle Doves are known to breed at Wood Green a couple of hundred meters from Cable Route Corridor 4 as well as within 7A a few hundred metres from Site 4.

8.4 Lapwing

- Site 4 is part of the Priority Species for Countryside Stewardship Targeting for Lapwings;
- Lapwings breed on wet, grassy fields and arable and have been recorded on neighbouring fields to plot 4;
- Like Skylarks, Lapwings typically avoid nesting fields with vertical structures like panels and high hedges and are highly vulnerable to disturbances.

8.5 Great Crested Newts

- Both sites 4A and 4B are a CORE strategic area of opportunity for Great Crested Newts with recorded colonies and site within the Core 5 and Fringe 5 data.
- All the circles identify water sources on or within the immediate radius of site 4 as well as the tributaries of the river Tas that are within meters of the site and ponds.



- **Natural England** will only accept survey results carried out within the optimum survey period between **mid-April to the end of June**;
- **From Natural England**, 'a survey for Great Crested Newts should be conducted where there's a suitable water body such as a pond or ditch within **500 metres** (m) of the development, even if it only holds water for some of the year' Gov.uk;
- Great Crested Newts have been located on multiple ponds and water areas on sub-site 4B and across CRC4 based on data records since 2006 up and until 2023 EPS Environmental Study Vol3; App 8.3 March 2026;
- East Pye Solar stated Surveys were to be carried out June 2024 and June 2025 on other ponds and water areas on sites;
- Further surveys were carried out on a 250m buffer zone and are dated towards the end of June (at the end of the optimum survey time) also into July, August and September;
- GCN were found to be on ponds and water areas within site 4A and 4B and within the 250m buffer zone of both sub-sites of 4;
- No surveys were carried out on ponds on CRC4 as ponds were not present on the online mapping and only discovered during CRC extended habitat surveys undertaken in late 2025 and therefore status is unknown but precautionary assumption is made. There are GCN on most ponds across the CRC4;
- Some results were 'precautionary positive' due to no access or ponds were dry. Surveys on fields during key harvest times and during summer months, especially in June 2025 when the county had been in drought for months, is no surprise;
- Many local ponds have not been surveyed for Great Crested Newts by which there are breeding colonies;
- Resident of the Tumbrel Barn, Norwich Road was written to by East Pye Solar however no surveys were carried out. **Great Crested Newts are present in the pond and is located within 100m of Site 4**;
- Great Crested Newt has been located foraging in the garden at Mayfield Farm Cottage within 200m of Cable Route Corridor 4 and 100m away from the large natural pond within the property boundary which isn't acknowledged within the DCO documents;

- **Many natural habitats will be removed or disturbed, like significant hedgerows and foraging habitat, during construction;**
- The GCN population is considered important at a local level;
- Absence of a record labelled as 'inconclusive' does not mean there are no Great Crested Newts. It could mean there is no survey data available for that location or data could not be gained;
- In addition to the water ponds and streams circled below there are all the water courses and tributaries of the river Tas within close proximity

8.6 Common Toads

In South Norfolk, common toads are protected under the Wildlife and Countryside Act 1981, which prohibits their trade, sale, or barter. As a NERC Act 2006 (Section 41) Biodiversity Action Plan species, they are considered a priority species, requiring developers and planners to mitigate against adverse effects.

Many villages have 'Toad Patrol' to help the toads cross roads to the safety of ponds for breeding.

Key protection details:

- **Legal Status**
- **Planning Protection:** Due to being a Biodiversity Action Plan (BAP) species, local planning authorities must consider impacts on toad habitats (ponds/terrestrial) during development.
- **Conservation Status:** Recognized as a species of principal importance.
- **Highways Consideration:** Planners and engineers must consider toad migration routes in road developments.

8.7 Badgers

Badger surveys are confidential to the public. Has the Applicant surveyed Site 4?

An active badger sett has recently been identified within woodland in Site 4. Evidence of current use includes tracks traced from a dead badger found on the A140 back to the sett. The woodland is proposed to be surrounded by solar panels and fencing and lies beside two main construction haul routes. The submitted badger information is redacted, so affected parties cannot determine whether this active sett has been identified, classified or assessed. This creates a serious uncertainty in the ecological baseline and in the assessment of construction disturbance, severance of foraging/commuting routes, collision risk, lighting, vibration, trench hazards and potential sett interference.

The Applicant should be required to confirm confidentially to the Examining Authority, Natural England and the relevant authority ecologists whether this sett is included in the ES badger survey; whether it is a main, annex, subsidiary or outlier sett; what activity level has been recorded; what buffer distances are proposed from haul routes, fencing, panels, trenches, lighting and construction compounds; whether any works would require a Natural England licence; and where those measures are secured in the DCO requirements and certified documents.

Given that the sett lies in a woodland also associated with Barbastelle Core Sustenance Zone habitat, within a hydrologically connected landscape draining toward the River Tas as well as a mitigated area given to Skylarks, demonstrating the significance to ground nesting at Site 4, this cannot be treated as a minor isolated constraint. It is further evidence that Site 4 forms part of a connected ecological network whose disturbance, fragmentation and cumulative effects have not been adequately fixed or assessed.



In practical terms, it is specific, evidential, site-based, and exposes the weakness of outline mitigation. This indicator sits under Ecology baseline adequacy / protected species / construction controls / Site 4 specific constraints, and cross-reference barbastelles, woodland isolation, haul routes, lighting, hydrology and the Tas.

8.8 River Tas – Protected Chalk Stream

Chalk Streams are ecologically sensitive water bodies typically found in areas of chalk bedrock like that proposed by East Pye Solar.

85% of Chalk Streams are found in the UK and 10% of those are in Norfolk making the county globally important for this rare habitat.

Chalk Streams are one of the rarest habitats on earth with their crystal-clear water home to water voles, white-clawed crayfish, Norfolk hawker dragonflies and kingfishers; making them our equivalent to the Great Barrier Reef or Amazon Rainforest. A truly special habitat.

They are not just important in their own right, they are a fabulous corridor for wildlife such as otters, birds, bats - helping them move through the landscape.



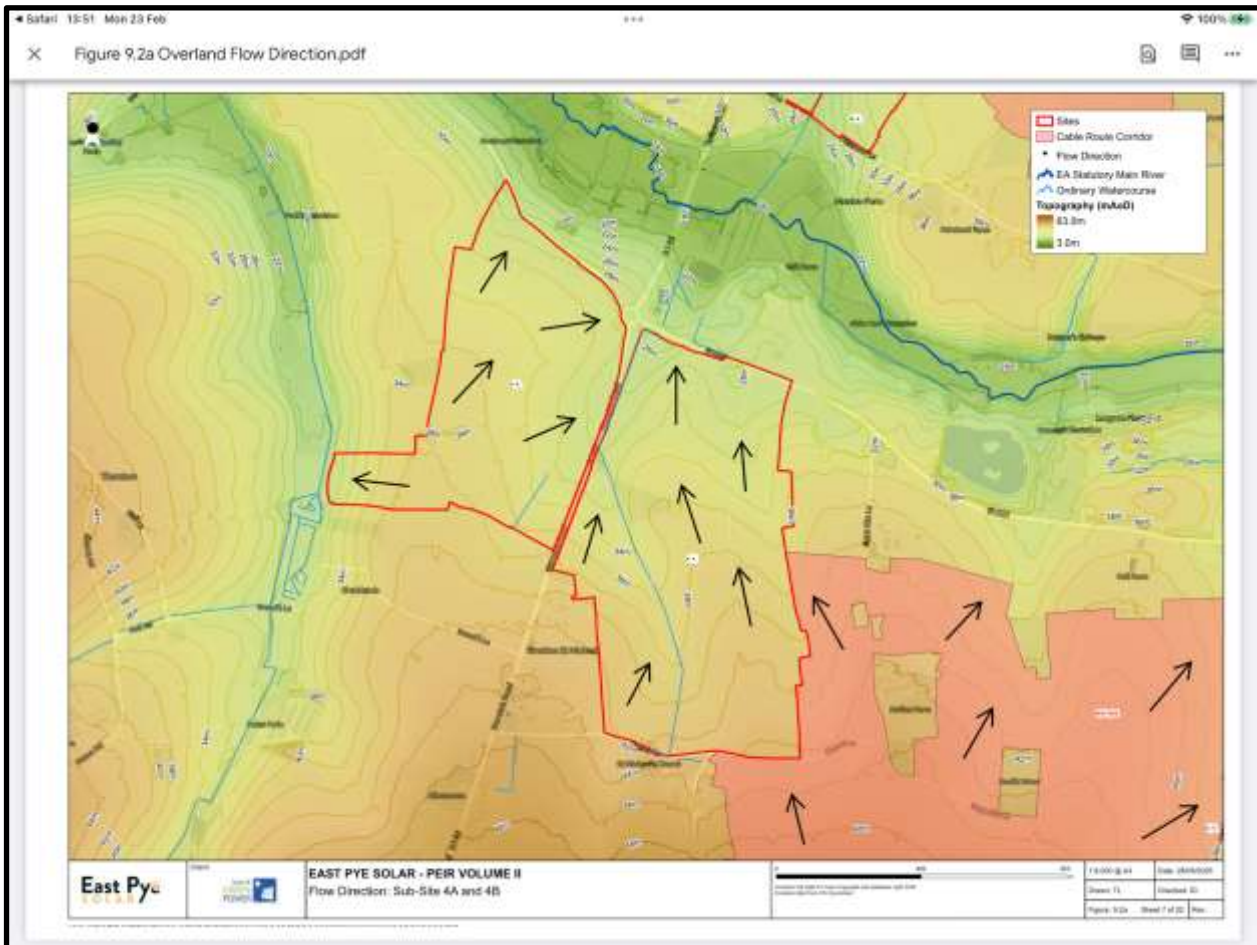
Some risks posed to chalk streams in the construction, operation and decommissioning of a solar factory as follows:

- **Water consumption:** will increase reducing potential availability for chalk streams especially during dry periods.
- **Habitat Modification:** changes in land use will disrupt the natural habitats of flora and fauna that rely on chalk streams.
- **Runoff and Pollution:** construction activities like wheel washing can increase runoff and introduce pollutants like oils and chemicals that can adversely affect water quality in chalk streams.
- **Soil Compaction:** Heavy machinery used during construction, decommissioning and maintenance during operation will compact the soil affecting groundwater recharge and potentially altering the flow and quality of water feeding the chalk stream.
- **Erosion:** The removal of vegetation during construction can lead to increased erosion, which can introduce sediment into the stream and harm aquatic ecosystems.

The River Tas runs directly north of site 4A and 4B on the other side of the B1527 with tributaries meeting the far west corner of site 4A.

The field directly to the south boundary of site 4A slopes south west towards the corner with Shrubland's at Brand's Lane and floods in wet weather due to the sloping elevation. This field is adjacent to a significant number of tributaries of the river Tas.

The rest of site 4A and all of site 4B flows towards the north boundary and the river Tas.



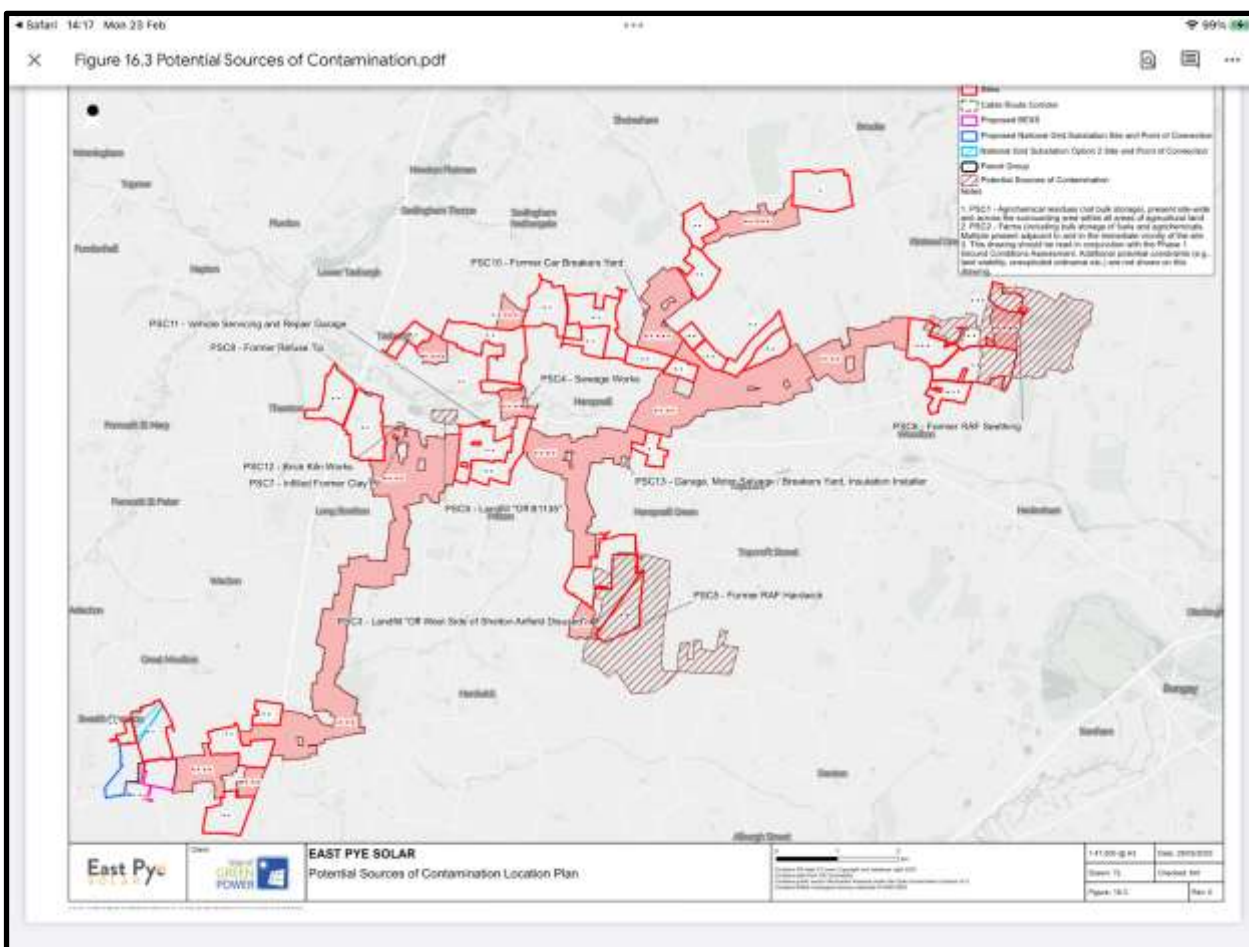
Site 4B has an unnamed water course flowing across the site towards the river Tas and will be subjected to run off and changed hydrology during construction, operation and decommissioning.

The removal of vegetation, soil compaction, extensive concrete, including the building of a substation and construction site (with wheel-washing facility) across site 4, and changed hydrology patterns from the installed infrastructure, will have a significant impact on water flows to the Tas. These fields already flood during the winter months.

Potential contamination of water and drainage into the river Tas from site 4B if historical sites, as recorded, are disturbed by construction. It is noted on East Pye Solar documents, "A refuse tip: Mapping dated 1883 shows a gravel pit extending approximately 30m into sub-site 4b, with a further extension by the mid-1940s. Mapping dated 1976 records the pit as a refuse tip. This gives rise to potential contamination of concern (COC) which are landfill gasses, (methane, carbon dioxide, hydrogen sulphide), metals and metalloids, petroleum hydrocarbons, polycyclic aromatic hydrocarbons, asbestos, inorganic compounds, eg. Cyanides, sulphates, chloride etc".

Furthermore, immediately north of CRC4 Brick Kiln Works mapping dated 1883 disused by the 1950s and now the site used by Colorcote. A potential source of COCs that are listed as metals

and metalloids, asbestos, petroleum hydrocarbons, PAHs, Volatile and semi-volatile organic compounds. (Phase 1 Ground Conditions Assessment East Pye Solar Project, Stantec, p.56 January 2025)



8.9 White Clawed Crayfish

The White-Clawed Crayfish is a freshwater bronze-coloured crustacean with pale undersides to its claws.

They live in clean, calcareous, oxygen-rich and slow-flowing freshwater streams, rivers, lakes, canals and quarries which are mineral-rich for their shell development.

They require an environment where they can hide and burrow like tree roots, woody debris, rocks and stones. Commonly shallow waters (under 1m) though they can inhabit deeper water.

Norfolk Rivers Trust has confirmed the presence of breeding colonies of White Clawed Crayfish in the river Tas and its tributaries.

The direct hydrological connection between land parcel 4, both A and B, the River Tas and its catchment area poses a significant risk to the hydrology of the Tas and White Clawed Crayfish.

White Clawed Crayfish are protected in the UK under the Wildlife and Countryside Act 1981, Annex II and V of the EC Water Habitats Directive and listed as Endangered on the global IUCN Red List of Threatened Species.

It is illegal to take or disturb White-Clawed Crayfish with a licence.

Distribution, although widespread, is **Rare**.



8.10 Hedgerows and Significant Trees

According to East Pye Solar, across the Site 'the Scheme' will be designed to avoid removal and damage to hedgerows. Subject to final design, where this is not feasibly practicable, some removal of hedgerows may be required. Any removal would be in line with the Hedgerow Regulations (1997)³² with necessary assessment taken place.

However there is already evidence that hedgerows have been damaged or removed at strategic points as well as trees highlighted at points of road widening, ie Edges Lane on CRC4, widening to the entrance of plot 4A. Also plenty of mature hedgerows will be removed to create CRC4 as well as access points on the cable route to ensure visibility.

An example of enclosed fields and mature hedgerows on CRC4:



The woodland and surrounding area to the north west of site 4B is identified as a **High Spatial Priority** for a woodland habitat. The balance identified as Spatial Priority

Veteran and ancient trees are living legends that have been a part of our landscape for generations. They are vital havens and habitat for wildlife and important carbon stores. Trees play a crucial role in regulating the climate and increase resilience to climate change. In the

immediate term the habitats and benefits that mature trees provide cannot be replaced with newly planted saplings.

East Pye solar project sites 4A and B have several veteran and an ancient oak trees within close proximity to the sites or at the roadside. This makes them vulnerable to the effects of construction of the solar arrays, substation and access routes onto the sites.

Oak trees contribute to landscapes, biodiversity, culture and economy is immeasurable. They symbolise royalty, patriotism and strength! They provide a habitat for 2300 wildlife species providing vital spaces to eat, shelter and breed. The true numbers of biodiversity are likely to be larger as the figure of 2300 doesn't include bacteria and other microorganisms.

NO OTHER TREE SPECIES IN THE UNITED KINGDOM SUPPORTS A GREATER DIVERSITY OF LIFE THAN AN ANCIENT OAK

List of Oak Trees at and nearby Sites 4a & 4b

Oak tree Id 52559 veteran tree 3m girth grid reference TM20379492 roadside

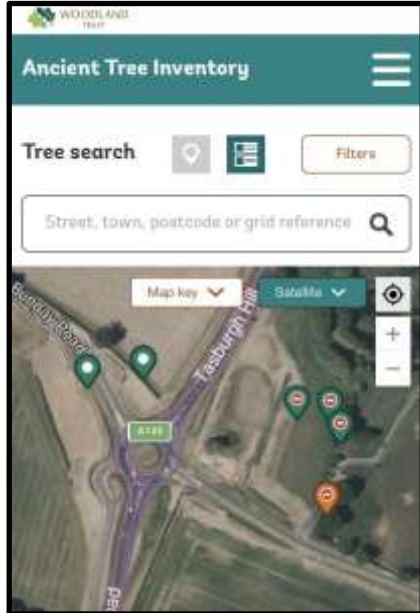
Oak tree id 52561 veteran tree girth 3m girth TM20429493 roadside

Oak tree Id 49912 Ancient tree 6.9m girth grid reference TM2059094814

See photo below



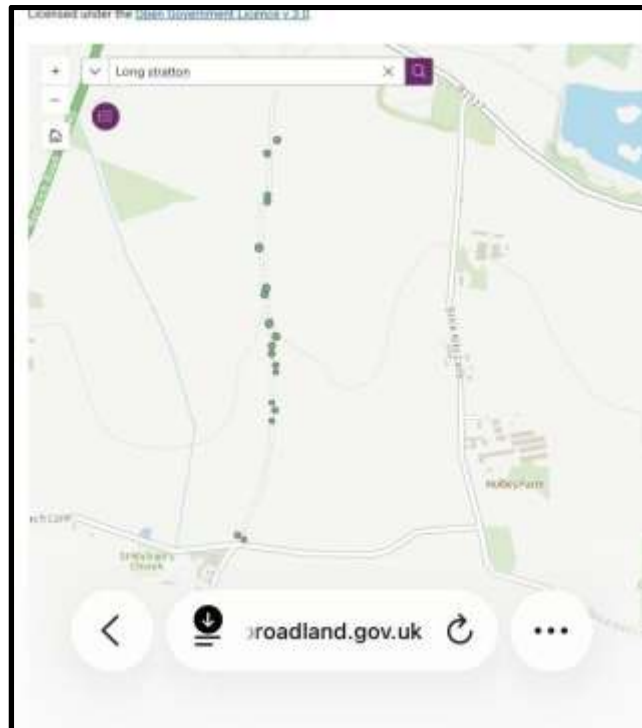
Oak tree id 50504 veteran tree girth 5m grid reference TM21019462 roadside



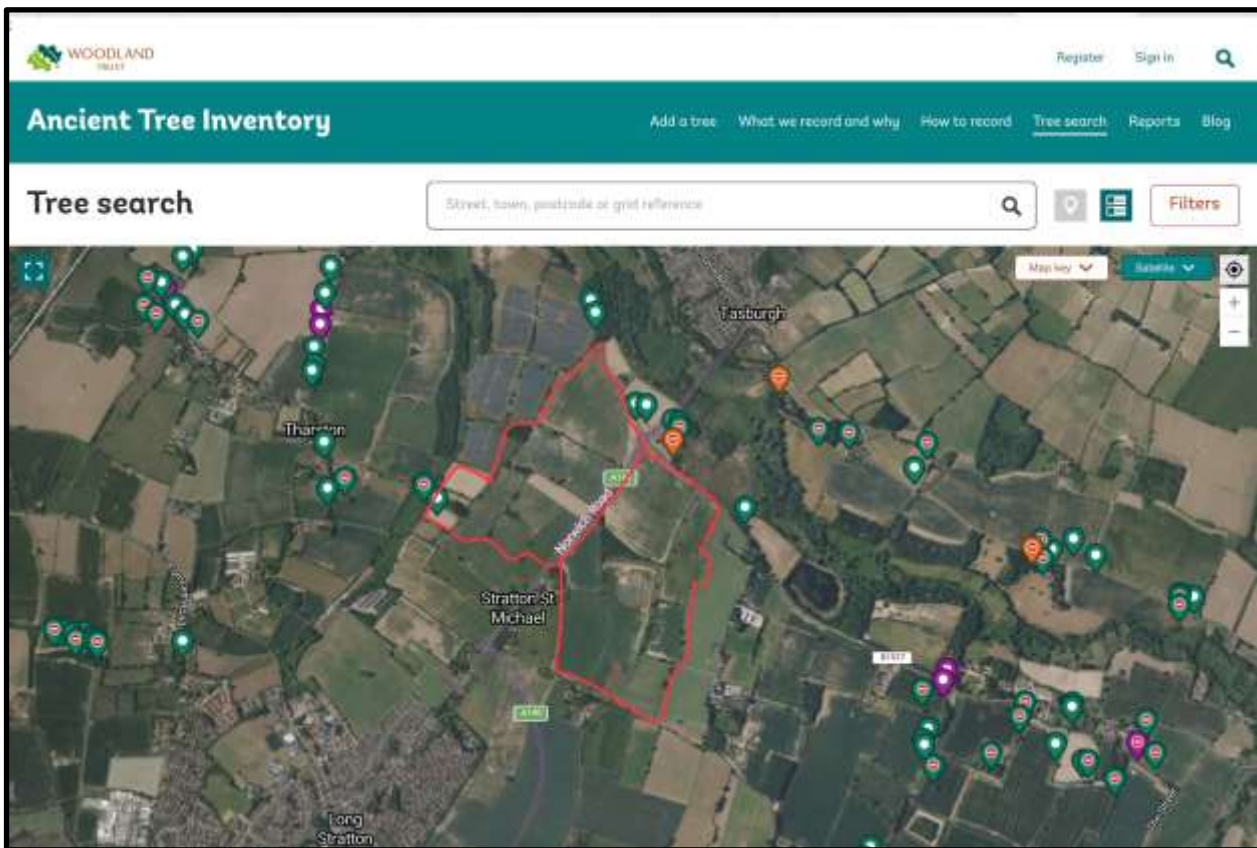
Oak tree id 51957 veteran tree 4m girth grid reference TM19569424

Oak tree id 53007 veteran tree 1.9m girth grid reference TM19649420 roadside

South Norfolk and Broadland Tree Protection Orders



Sub-Site 4B has multiple Tree Protection Orders in place all along the Long Stratton Footpath 3 which will be closed during construction and adjacent to security fencing thereafter.



Site 4 is surrounded by veteran and ancient oak trees.

Ancient and established hedgerows benefit nature and climate

Ancient and established hedgerows are critical, living infrastructure that provide immense, multi-layered benefits to both biodiversity and climate change mitigation, often acting as "superheroes" of the countryside. These, often centuries-old, linear habitats function as vital **wildlife corridors**, **carbon sinks**, and **natural flood management systems**. CPRE

Here is a detailed breakdown of how they benefit nature and climate:

Benefits to Nature and Biodiversity

- **Biodiversity Hotspots and Refuges:** Hedgerows support over 600 plant, 1,500 insect, 65 bird, and 20 mammal species. They are essential habitats for threatened species, including the **hazel dormouse**, hedgehogs, and the brown hairstreak butterfly.
- **Green Corridors (Wildlife Highways):** In fragmented landscapes, established hedges act as crucial, continuous green arteries, allowing species to move, forage, and spread safely between isolated woodlands and fields.

- **Food and Shelter:** They provide year-round resources, including berries, nuts, and nectar for pollinators, and act as nesting sites for farmland birds (supporting up to 80% of woodland/farmland bird species).
- **Nursery for Predators:** Hedgerows house predatory insects (like ladybirds and beetles) that naturally control agricultural pests, reducing the need for pesticides. CPRE

Benefits to Climate and Environment

- **Carbon Sequestration and Storage:** Like trees, hedgerows lock up significant carbon in their woody biomass, leaves, and roots. Crucially, the soil beneath established, older hedges can store up to **40% more carbon than surrounding grassland**, making them a major long-term carbon sink.
- **Soil Stabilization:** Their deep, established root systems bind the soil, reducing erosion from wind and water, which is essential given that 1 inch of topsoil can take over 500 years to form.
- **Flood Mitigation and Water Quality:** Hedgerows act as "sponges" and physical barriers that intercept heavy rainfall, slowing water flow and increasing infiltration, thus reducing flood risks. They also reduce water-borne pollution by trapping fertilizers and pesticides before they enter watercourses.
- **Microclimate Regulation:** They provide vital shade and shelter for livestock and crops, reducing heat stress in summer and protecting against cold winds and snow in winter.
- **Air Pollution Capture:** In both rural and urban areas, hedgerows, particularly those with rough, hairy leaves, trap air pollution particles. University of Leeds

The Value of "Ancient" vs. New

- **Species Richness:** Ancient hedges (often 400+ years old) have higher species diversity, providing more varied habitats and resources than recently planted, single-species hedges.
- **Structural Maturity:** Older, established hedges have larger, more robust roots and biomass, offering superior carbon storage and shelter compared to young trees.
- **Heritage & Continuity:** They act as historical landmarks that define landscape character and connect us to centuries of agricultural heritage. University of Leeds
- A checkerboard of segregated fields is typical of the character of South Norfolk and easily identified across the scheme by the various shapes of land parcels proposed;
- Site 4 comprises of 12 fields separated by hedgerows;
- CRC4 comprises approximately 50 fields separated by hedgerows.

8.11 Rare Flora

No surveys have been carried out on road boundaries and verges across the Scheme. Many verges are supported by the Roadside Conservation Scheme and will be impacted with heavy construction traffic and access points for Cabling and Sites including Parker's Lane and Wood Lane for CRC4

8.12 Cable Route

Cable Route 4 connects the north section of the scheme from Site 4 to the south section at plot 2, over a **distance of approximately 8km**. It is the largest cable route of the scheme.

East Pye Solar state that a fenced area of 50m wide will be utilised to create the cabling route, digging a channel 2m deep.

A 2-way haul road will be created, up to **7.5m wide**, on the length of the corridor to allow 16.5m HGVs to manoeuvre back and forth along CRC4.

The cable route will pass through ~50 arable fields, all of **BMV Grade 1-3a**. The fields grow various crops from oilseed rape, wheat, barely, sugar beet. Some have sub-crops of hayledge and have grazed sheep, short term.

The fields are used as a wildlife corridor for red and roe deer; hares can be found on most fields especially in the Spring where they chase and socialise. The fields support breeding skylarks which can be heard and seen across the expanse.





Most of cable route 4 comprises interconnecting **fields with established hedgerows** separating the fields with many small, wooded areas supporting multiple red listed birds and protection for wildlife.

Compound 2 is planned for a field on Mill Road next to Harvey Lane PRow and woodland, opposite the entrance to Mayfield Farm, Mayfield Farm Barns and Mayfield Cottage.

The private driveway for Mayfield Farm homes is also a PRow and bridleway.

Compound 2 will not have clear visibility of traffic that approaches from the east as the road curves and is shielded by woodland on both sides of the road.



Mill Road where the Compound 2 will be located to the left and CRC4 will cross to the right. Entrance to Mayfield Farm is on the right just as the woodland begins and the road disappears to the left.

Images below are of Harveys Lane PRow and Bridleway that will be on the left and opposite the entrance to Mayfield Farm driveway and public bridleway.



The cable route will cross multiple small single-track lanes essential for access to rural properties.

Wood Green Common is an area of Long Stratton parish, located 0.5 mile to the south east and a few hundred metres from Tyrell's Wood.

Wood Green lies on the CRC4 corridor that passes along Parker's Lane.

Wood Green is a small hamlet of residential properties surrounding the common; wooded areas, reed beds, ponds and natural grazing grasses that are boggy in winter. It's a haven for biodiversity and wildlife due to its relatively undisturbed, rich environment and quietness.

As common land, it's naturally grazed by horses to support the biodiversity environment.

From December to March, migrating starlings roost in the reed beds and murmurations can be seen at sunrise and sunset.



Wood Green supports many red listed birds and species of native deer.

During the Long Stratton by-pass construction over the winter of 2024, the starling roosts were disturbed by the construction traffic, so the birds didn't roost there. A smaller flock have re-established the roost in 2025/2026.

The cable route moves south and passes to the west of Tyrell's Wood.

Tyrell's Wood (or Tyrells Wood) in Norfolk is a designated **Site of Special Scientific Interest (SSSI)** and is part of Boudicca Way.

Tyrell's Wood is listed on the Norfolk and Norwich Bat Group as a site of significance.

It is managed by the Woodland Trust, is an ancient woodland, notably identified in ecological reviews as a site for maternity colony Barbastelle bat roosts.

Chapter 9: Water Environment

Introduction

Water Environmental Considerations for Land Parcels 4A and 4B:

Situated on the northern boundary and buffer zone of Long Stratton and bisected by the A140 Norwich Road.

Site 4 consists of approximately 100 hectares of BMV grade 2 agricultural land; divided into 12 fields featuring several established drainage ditches and natural ponds plus a water course dissecting 4B flowing south to north across the site towards the River Tas. Bit sub-sites have established hedgerows, veteran trees and woodland areas which are critical to the local hydrological network.

The fields have some undulation and are prone to flooding in parts with runoff down to Brand's Lane near site 4A and floods in wet weather. Brands Lane and the south west corner borders the Tas tributary.

Water-related environmental risks for these specific parcels include:

- **Surface Water Management and Flood Risk:** The change in land use from agriculture to solar infrastructure increases impermeable surface areas, which could alter natural runoff patterns, potentially elevating flood risk in surrounding areas.
- **Groundwater Protection:** The site lies within a designated Groundwater Source Protection Zone 3 (Total Catchment), meaning any contamination—particularly during the construction phase—could impact the recharge of drinking water supplies.
- **Drainage and Water Quality:** Construction activities, such as pile driving for panel foundations and cable trenching, pose risks to existing boundary ditches and could introduce sedimentation or pollutants into the river Tas tributaries within 100m of the sites.

9.1 Rivers, Streams, Ditches, Culverts

East Pye EIA Scoping Report, Land Parcels 4A and 4B are situated north of Long Stratton and south of Tasburgh. While the specific names of minor culverts are often internal to engineering drawings, the following key watercourses are identified as being at risk or requiring assessment:

East Pye Solar

- **The River Tas:** This is the primary regional watercourse. It is a protected Chalk Stream known for its extreme ecological sensitivity. Site 4's drainage eventually contributes to the Tas catchment.

- Sub-Site 4B has an unmarked watercourse that dissects the site although EPS has it marked as a drainage ditch which is incorrect;
- **Drainage Ditches:** Both sub-parcels are agricultural fields "bordered by groups of trees and hedgerows" that contain established drainage networks. These ditches are critical for local hydrological management and are sensitive to sedimentation during construction. nsip-documents.planninginspectorate.gov.uk
- **CRC4:** there are at least 9 lane crossings on the CRC4 including site access. All crossings include drainage ditches crucial to preventing surface water flooding;
- **Field Drainage Systems:** many local fields have underground drainage pipes feeding to the drainage ditches to prevent waterlogging. The field on CRC4 at Mill Road where the compound will be located, replaced the field drainage in 2024;
- **Boundary Watercourses:** Sub-Site 4A is bordered by the B1527 to the north and the A140 to the east. These road corridors typically feature roadside culverts and drainage channels that must be protected from increased runoff or blockage during the installation of solar arrays and during operation. nsip-documents.planninginspectorate.gov.uk
- **Groundwater Source Protection Zone 3:** Most of the site is within this zone, meaning that any impact on local water ingress or quality directly affects the "Total Catchment" for regional drinking water supplies. nsip-documents.planninginspectorate.gov.uk

The development's Environmental Impact Assessment (EIA) must address these risks by proposing mitigation for cable crossings over these watercourses.

9.2 Flooding

Agricultural and residential fields in South Norfolk are particularly susceptible to waterlogging due to the area's geology which features significant amounts of slow-draining Chalky Boulder Clay, combined with naturally low-lying topography and a naturally high or perched water table.

Several factors make fields across the area highly prone to saturation:

- **Heavy Clay Soils:** Large tracts of South Norfolk are dominated by poorly draining soils that prevent rainwater from percolating downward quickly, which causes standing water after heavy rainfall;
- **High Water Tables;** especially during wet winters, high water tables and groundwater can cause surface pooling in topographic low spots;
- **Run-off from Modern Development:** As residential areas grow like Long Stratton with more housing Edith being built or planned to be built, altered natural water pathways can speed up surface run-off, exacerbating saturation in adjacent open fields and farmland.

Christmas Eve 2020, Long Stratton was seriously flooded due to heavy and persistent rainfall leading to flash flooding as local drains and watercourses just couldn't cope.

Long Stratton is in a dip that gently slopes down from Site 4. Local fields were saturated and the lanes regularly experience surface water. Drainage, watercourses were full and couldn't cope causing the flash flood.

Flood risks have been a concern since 2020 in the centre of Long Stratton during and following heavy persistent rain where gardens have flooded albeit water not quite reaching the homes.

With the expansion of 1800+ homes that will be within as little as 300m and on the downward slope from Site 4, the flood risk has to be taken seriously.





The above images show Long Stratton during Christmas 2020

Site 4A

- Flood Risk Management Priorities - HIGH PRIORITY at south and west section of plot 4A
- Site is within Flood Zone 3 with high probability of flooding from rivers as well as surface water
- Natural Management Opportunities includes boundary enhancement opportunities on shallow slopes.

Site 4B

- Most of the site 4B is designated as a MEDIUM to HIGH groundwater flooding area with the remainder designated MEDIUM RISK
- Site 4B Natural Historic Landscape Characteristic (250m grid) (England) Western side of planned solar installation is identified as Water Supply and Flood Defence area.



Sub-site 4B



Sub-site 4B



Sub-site 4B with surface water pooling in the crop fields



Sub-site 4B with surface water due to compaction



Church Lane, February 2026 flooded and the culvert to the left is full to the brim as is the field pond to the right.





Cleve Hill, Kent is the first NSIP and test case for the others. Even before the site was finished it flooded beyond the site itself, and livestock were removed from areas outside the perimeter due to risk of pollution.

9.3 Public Drinking Water Supplies

The River Tas in Norfolk is part of the Broadland rivers catchment, which generally supports public water supplies, particularly around Norwich. While the catchment is used, the river is primarily characterised as a chalk stream and tributary of the River Yare. Broadland Catchment Partnership

Key details regarding the River Tas:

- **Catchment Area:** The Tas flows from near Hempnall and joins the River Yare, contributing to the broader water network in the region.
- **Water Source:** The river, along with other Broadland rivers and groundwater, is utilised in the overall catchment strategy for supplying drinking water, specifically to the Norwich area.
- **Environmental Context:** As a tributary of the Yare, it is a chalk stream. However, water quality in the region has been flagged, with reports in 2025 suggesting high levels of pollution in many Norfolk Broads rivers. Broadland Catchment Partnership

Most public drinking water in Norfolk is sourced from groundwater (chalk aquifers) rather than directly from smaller, raw river sources like the Tas, though the river feeds the wider system.

9.4 Private Drinking Water Supplies

South Norfolk and Broadland District Council private water abstractions information:

There are 35 private water supplies registered pursuant to the provisions of the Private Water Supply Regulations 2016 within 250m of the Site. The council were unable to provide co-ordinates. The strata from which these private water supplies abstract water was not provided. Private water supplies are located in proximity to the following CRC and sub-Sites.

- o Substation.
- o 1A, 2B, 3A, 3B, 6, 7A, 7B, 7C, 7D, 7F, 7I, 8A, 8B, 10E.
- o CRC1, CRC2, **CRC4**, CRC7, CRC8, CRC10, CRC11, CRC13.

The Council do not hold any other relevant ground conditions information.

9.5 Drinking Water Protection Zone (SPZs)

The area between Tasburgh and Hempnall is within a designated water protection area. Specifically, this area is part of the **Yare Operational Catchment**, which includes the **Hempnall Beck** and the **River Tas** (from its headwaters to downstream of Tasburgh).

Data.gov.uk

Water protection in this area:

- **Drinking Water Safeguard Zones (SGZs):** The area is monitored for water quality, with specific attention to protecting water sources used for drinking.

9.6 Contamination risks to Public and Private Drinking Water Supplies

The East Pye Construction scheme on Site 4A and 4B, and the influx of construction workers, will impact water and waste management during the 2-3 years the East Pye Solar project will take to build and subsequently dismantle as well as the intermediate replacement of panels every 20-30years.

Flooding and groundwater resulting from wheel washing, pile driving and land disruptions will all have the potential to drain towards the chalk stream and lead to contamination of the water course.

Land parcels 4A and 4B slope towards the tributary of the Tas.

Principal risks are:

- Accidental spillage for fuel or oil during construction;
- leakage from construction compounds including the one on Sub-Site 4A;
- sediment run off into ditches, culverts and streams;
- contamination from concrete works;
- disturbance of existing drainage systems.

9.7 Risks of Pile-Driven and Concrete-Mounted Infrastructure to Private Drinking Water Supplies

East Pye Solar Project proposed plan for Land parcel 4 is for the construction of solar arrays and a substation as well as a compound on site 4A. Therefore, these land parcels will be impacted as detailed below;

Concrete-mounted infrastructure—such as building foundations, pilings, paving, and retaining walls—can significantly impact private drinking water supplies (wells, boreholes, and springs) primarily through chemical leaching and physical disruption of groundwater flow. These impacts are most severe during construction and for a period after, as fresh concrete is highly alkaline and releases pollutants:

1: Chemical Contamination (Leaching)

- **High pH and Alkalinity:** Fresh concrete and grout are extremely alkaline (high pH). Rainwater or groundwater passing through or over new concrete structures can dissolve cement components, leading to "leachate" that increases the alkalinity of nearby groundwater.
- **Heavy Metal Contamination:** Concrete leachate can contain heavy metals and harmful elements that contaminate water sources, including chromium (particularly Hexavalent Chromium VI), arsenic, barium, lead, zinc, and nickel.
- **Sulphate and Mineral Release:** The leaching process can increase sulphate, calcium, and mineral content, which may make the water taste metallic, appear cloudy (turbid), or exceed safety standards for human consumption.
- **Interaction with Disinfectants:** If water containing disinfectants (like chlorine) comes into contact with new cement surfaces, the leaching of pollutants—including aluminum and chromium—can increase significantly. [Springer Nature Link](#)

2: Groundwater Disruption and Physical Damage

- **Alteration of Flow Patterns:** Deep foundations, pilings, ground compaction and retaining walls can act as barriers that disrupt natural groundwater flow, causing water to rise upstream of the structure or reducing the supply (yield) to nearby wells.
- **Dewatering Risks:** During the construction of concrete structures (e.g., in deep excavations), contractors may pump out groundwater. This "dewatering" can

temporarily or permanently lower the water table, reducing the yield of nearby private wells.

- **Creation of Contaminant Pathways:** Improperly designed or installed concrete foundations can create new, preferential pathways for surface pollutants to travel directly into aquifers, bypassing natural soil filtration. [Preene Groundwater Consulting](#)

3: Structural Vulnerabilities

- **Porosity of Old Infrastructure:** While concrete is generally durable, older concrete tanks or wells can develop cracks, allowing surface contaminants (bacteria, nitrates) to enter the drinking water supply.
- **Weakened Structure:** Soft groundwater can react with concrete, causing it to deteriorate over time, further increasing the potential for contaminants to leach into the surrounding ground. [Springer Nature Link](#)

The River Tas catchment is managed to reduce flood risk through a combination of local and national agencies.

- **Permit Requirements:** For works on or near the "Main River" sections of the Tas, requires a Flood Risk Activity Permit from the **Environment Agency**;
- For "ordinary watercourses" (smaller tributaries), consent is required from Norfolk Rivers Internal Drainage Board (IDB);
- **Sustainable Drainage (SuDS):** All new developments must follow Norfolk County Council's drainage design standards, ensuring that surface water run-off does not exceed greenfield rates. [Water Management Alliance](#)

9.8 River Catchment Area

Site 4A and 4B are both within 100m of river Tas tributary with risk of runoff contamination in two directions from site 4A.

Norfolk Rivers Trust has confirmed the presence of breeding colonies of white clawed crayfish in the Tas and its tributaries. The direct hydrological connection between land parcel 4 (both sub plots) and the River Tas and its catchment area poses a significant risk to the hydrology of the Tas and white clawed crayfish.

Chapter 10: Cultural Heritage

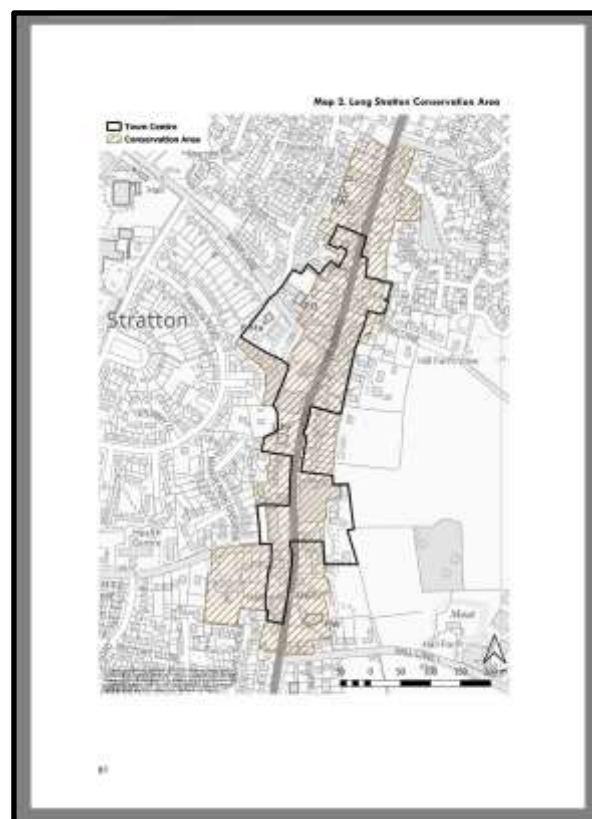
Introduction

Long Stratton is a modern civil parish made up of the two parishes, Stratton St. Mary's and Stratton St. Michael's which relate to the Grade I listed churches within the parish. In 1086 the settlement of Long Stratton was mentioned in the Domesday Book.

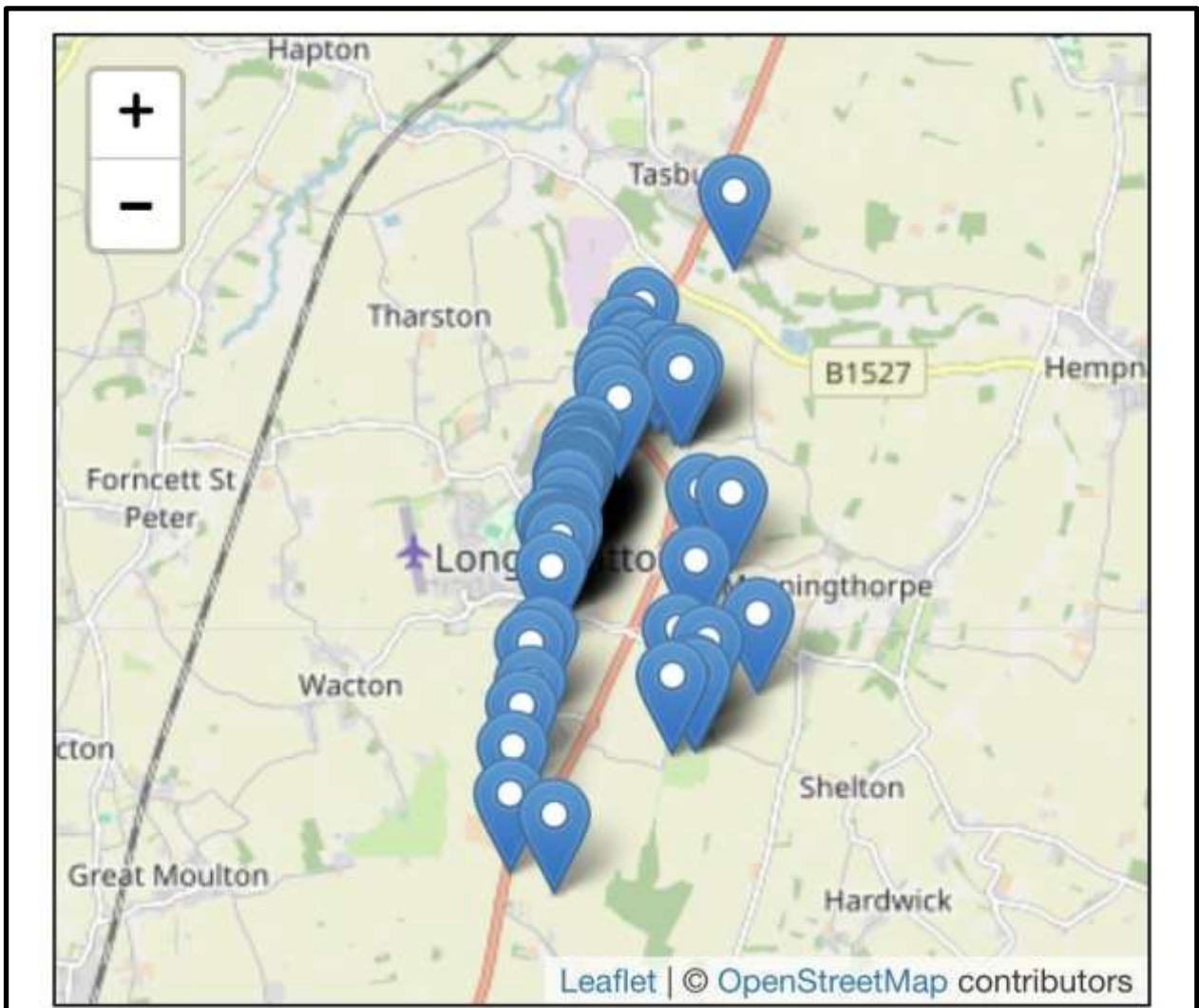
Long Stratton is a long thin settlement although the Parish takes in the wider rural community surrounding the residential area and is located in the south of the county.

The busy A140, also known as the Pye Road (NHER [7947](#)), runs through the length of the parish. The town of Long Stratton straddles the road, which dates to the Roman period. Indeed, the name of Long Stratton is derived from the Old English meaning 'farmstead or village on a Roman road'. On either side of the town there are small groups of farms and buildings grouped around the edges of former greens, such as Wood Green, and in the small hamlet of Stratton St Michael.

The Conservation area of Long Stratton extends beyond the town centre and incorporates multiple listed buildings with historic purpose.



The Map shows the Conservation Area and Town Centre



This Map shows the concentration of listed buildings within the parish of Long Stratton



Early photographs show the continuous street frontages along The Street of Stratton St Mary that then became Long Stratton.

That character is still evident today and apart from some modern additions is relatively unchanged along the Conservation Area.



This image shows the same area as the 1904 photograph above virtually unchanged in character and demonstrating the historic importance of the village.

The Long Stratton village sign symbolises the Sextons Wheel which can be found in Stratton St Mary Church. It is only one of two Sexton Wheels in the country. The other one is in Yaxley, Suffolk.

The Sextons Wheel is a rare medieval iron device used to determine the specific day a parishioner should begin religious fasting and prayer, particularly in honour of the Virgin Mary.



Sextons Wheel located in Stratton St Mary



Figure 13: Quasi-continuous street frontages along the central section of



Architectural details can be found all around the Conservation Area from pantile roofs, small dormers and steeples, gabled frontages and flint infill, round church towers, bay windows and jetting upper floors, decorated cornices and thatched roofs with Tudor chimneys, painted detail on red brick keystones, Dutch gables, brick parapets, terracotta frieze and oeil-de-boeuf windows



Figure 11: Residential boundaries formed of hedges, low walls, and metal fences along Star Lane.



Stratton St Mary Grade I listed, with its round tower made of flint and is a significant character of East Anglia where there is a lack of durable, quarried stone for carving sturdy, right-angled corners.



Corfe Cottage, c17th century Grade II listed

Griffon House, Grade II listed, dating back to 1719



The Cottage at Hall Lane, Grade II listed (with Stratton St Mary in the background) announcing the start of the Conservation Area.

Hall Lane and this corner is the proposed AIL route for CRC4 and will impact the the junction including within the Conservation Area.



A typical feature of Long Stratton and the surrounding rural area



Flint House, Ipswich Road, Long Stratton, Grade II listed c19th century



Corfe Lodge, Corfe Cottage and Chestnut House, Ipswich Road, Long Stratton c17th Century
Grade II listed



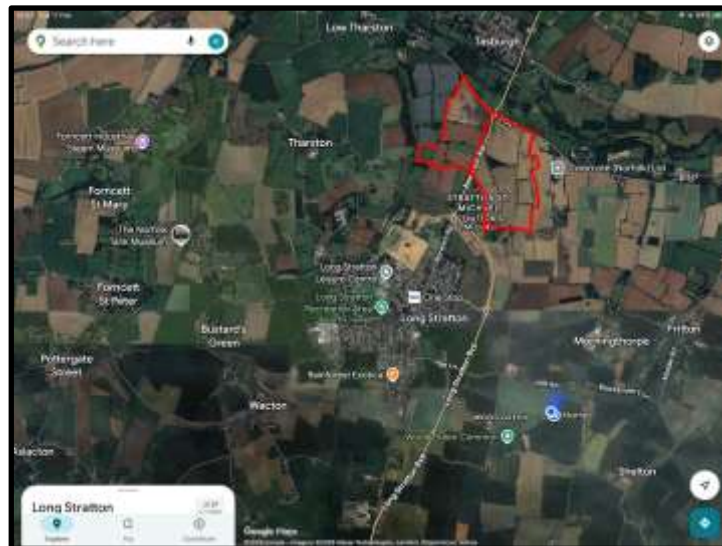
Long Stratton Village Hall and War Memorial, Grade II listed.
Another example of flint decorative architecture.

10.1 Impacts to Conservation Area

Map of Conservation Area in relation to Site 4



The size and location of the proposed site 4 to the north of the town boundary and bypass would dominate Long Stratton and the Conservation Area.



This map shows the impact of Site 4 on the bypass which is the boundary of the Long Stratton Neighbourhood Expansion Plan. Site 4 will be within 100m of the Neighbourhood Expansion Plan and 300m from Tasburgh creating a continuous area in settlement and industrialisation removing the buffer area between residential and countryside.



Aerial shot of Site 4 shown in orange taken from the northern boundary of the residential area of Long Stratton with Tasburgh Village in the background.

10.2 Impacts to Setting of Conservation Area

Land Parcel 4 lies within the setting of the Long Stratton and within a few hundred meters of the Conservation Area which is closely associated with an exceptional concentration of designated heritage assets, including:

- A Grade I listed church (St Michael's, Stratton St Michael)
- a Grade II* listed building (The Old Rectory)
- numerous Grade II listed farmhouses, barns and cottages, some within tens of metres of the site.

The Conservation Area appraisal identifies the importance of:

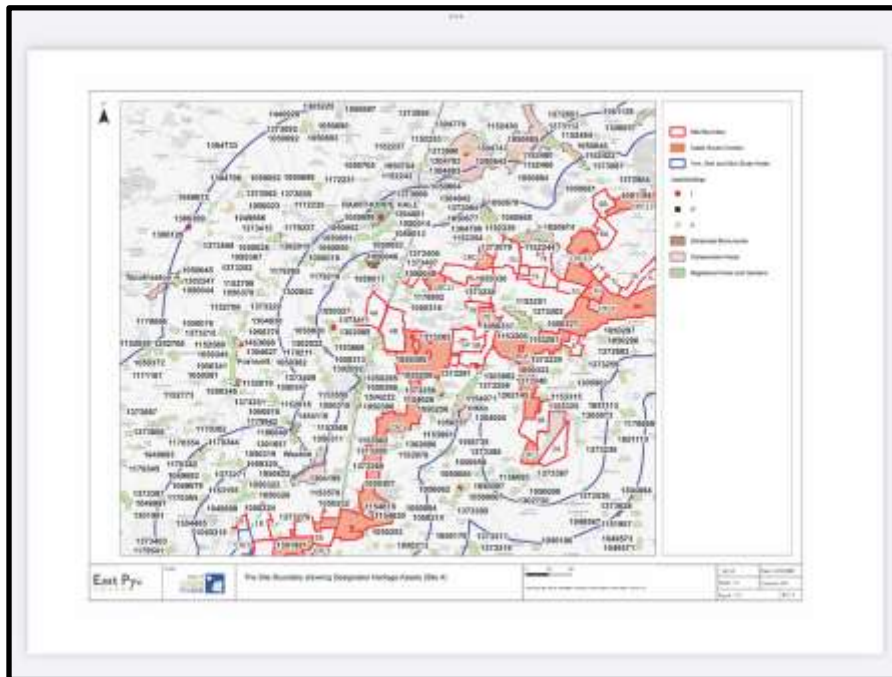
- Open agricultural land along the historic Roman road (A140);
- Long views into and out of the settlement;
- Legibility of historic development patterns.

Industrial solar infrastructure on both sides of the A140 would cause severe and unavoidable harm to setting.

Introducing fencing, arrays, lighting and glint/glare into views fundamental to the significance of the character of this setting.

Such harm cannot be mitigated by planting without compounding loss of openness and changing the topography of the landscape.

This represents high-weighted designated heritage harm sufficient on its own to render this parcel unacceptable.



10.3 Impacts to Grade 1 Listed Churches

St Mary's Church, Long Stratton



A medieval parish church with a 12th century round tower and early 14th century aisles. The church was extensively remodelled in the 15th century when new windows were inserted and the porch was constructed, and it was restored in the 1840s. The church contains some interesting 17th and 19th century memorials and a very rare example of a **16th century sexton's wheel**. The wheel may have been used for determining the date of the Lady Day Fast. **It is one of only two examples in the country.**

St Michaels's Church, Stratton St Michael



St Michael's Church (NHER [10187](#)) is located on Church Lane and dates mainly to the 14th century. It is a Grade I listed place of worship. It has a low west tower with a wooden bellcote. The church contains a 15th century font and 15th century poppy head bench ends.

The front gate is 4m from the boundary of plot 4B and views are across the site on Church Lane.



10.4 Impacts to Grade II* Listed Buildings



Historic England #1373264 **The Old Rectory**, Church Lane

- Shares boundary with site 4B
- Grade II* Listed
- 16c Timber Framed building



View from The Old Rectory across site 4B has the front gate 4m from plot 4B on Church Lane

10.5 Impacts to Grade II Listed Buildings

All the following listed properties share a boundary of the proposed Site 4

Historic England #1153675 **The Red Cottage**, Norwich Road

- Grade II Listed
- NHER 44299
- 17th Century timber framed cottage, refaced by brick in 19th century
- 100m from site 4A

Historic England #1050315 **Well Meadow Cottage**, Norwich Road within 200m

- NHER 44382
- Grade II Listed
- 17th century plastered cottage with central chimney stack

- within 200m of site 4B

Historic England #1050305 **Cottage**, Church Lane

- NHER 14698
- Grade II listed
- a 16th c Grade II timber framed and thatched cottage
- within 200m of Plot4B

Historic England #1153535 **Pair of cottages**, 1 and 2 Church Lane

- Grade II listed
- Within 200m of site 4B

Historic England #1153545 **Church Farmhouse**, Church Lane

- NHER #44413
- Grade II listed
- a 16th century timber framed Farmhouse.
- shares boundary with site 4B

Historic England #1050306 **Barn North of The Old Rectory**, Church Lane

- NHER #4412
- Grade II Listed
- A 16th century timber framed barn
- shares a boundary with site 4B

Historic England Site #1304177 **The Cedars**, Norwich Road

- a Grade 11 Listed
- 17th century Farmhouse
- shares boundary with site 4B and opposite site 4A

Historic England Site #1304177 **Dairy Barn** within the curtilage of The Cedars, Norwich Road

- Grade II Listed
- a 17th century timber framed barn now converted into a residential property
- shares boundary with site 4B

Historic England Site #1304177 **Tumbrel Barn** within the curtilage of The Cedars, Norwich Road

- Grade II Listed
- a 17th/18th century timber framed stables and Norfolk Clay lump now converted into a residential property
- Shares boundary with plot 4B

Please find below some of the properties listed above, their current views across open farmland and the impact site 4A and 4B will have on these properties and the people that have chosen to make them their home. This cannot be mitigated against.



Thatched Cottage, Church Lane; Grade II Listed



View from Thatched Cottage with front gate 4m from plot 4B



The Old Rectory Barn, Grade II Listed, Church Lane



The view from the front gate of The Old Rectory Barn, Church Lane 4m from plot 4B





Cottages 1&2, Church Lane with rear views across plot 4B



Church Farm Farmhouse, Rhee Lane: Grade II listed at the junction of Church Lane ,Stratton St Michael and Stratton Lane.



Church Farm: Grade II Listed at the junction to Church Lane and Rhees Lane and a view across Plot 4B



First listed in 1951, the Cedars Farmhouse has open boundaries to the land of site 4B which was once part of Cedar's Farm. West front block: late C18 grey brick with slate roof with coped gable ends and modillion brackets to eaves. Three storeys, sashed windows, central doorway with fluted pilasters and entablature, panelled reveals, rectangular fanlight and panelled door. Rear (east) block: the original house, C17 or earlier; plastered timber framing with steeply pitched gable-ended roof of pantiles.



Open views across agricultural fields to the east of The Cedars with no hard edging or screening.



The Cedars looking north and west over open farmland proposed for panels on plot 4A. GLint and glare will be unavoidable and cannot be mitigated against.





The Dairy Barn within the curtilage of The Cedars, Norwich Road

There are no hard or hedged boundaries between the arable land and that of the buildings. If this solar development was to go ahead then these properties would be sandwiched between site 4a and 4b with catastrophic results. Dairy Barn comprises two buildings, the barn is 17th century timber framed. The stables is a 19th century Norfolk Clay Lump and Timber Framed construction. This property is in the process of extensive development and has taken 10 years to reach this stage of renovation. **Dairy Barn is also the home to protected species (Bats & Barn Owls)** an ecological report was commissioned and Bat Boxes and Barn Owl roosting spots have been built.

8 PHOTOGRAPHS



Photo 1. Dairy Barn south elevation.



Photo 2. Dairy Barn east elevation.



Photo 3. Dairy Barn west elevation.



Photo 4. Interior of Dairy Barn (southern end).



View from Dairy Barn with open views across site 4B with no hard edges and hedging.



View from Dairy Barn facing south towards Church Lane across open farmland with no hard edging or hedging that is also known as Plot 4B



Dairy Barn and The Stables, part of the curtilage of the Cedars



Dairy Barn and the Stables with open views across farmland also known as Plot 4B



Tumbrel Barn within the curtilage of The Cedars, Grade II Listed conversion

Tumbrel Barn, a Grade II listed construction is one of three properties that comprise the original Cedar's Farm out buildings. Site 4b is part of Cedar's Farm. As such, there are no hard or hedged boundaries between the arable land and that of the buildings. If this solar development was to go ahead then these properties would be sandwiched between site 4a and 4b with catastrophic results. Tumbrel Barn comprises two buildings, the barn is 18th century timber framed. The stables is a 19th century Norfolk Clay Lump and Timber Framed construction. This property was converted in 2014/2015 and the restoration is ongoing. It is also the site of a very large hand dug 'natural' pond.



Tumbrel Barn, front elevation overlooking open farmland to the east with The Cedars in the background



Tumbrel Barn during conversion showing the clay lump construction.



As part of the conversion of Tumbrel Barn and Dairy Barn it was insisted both buildings kept the original wooden frame and clay lump making them historic fragile structures



Tumbrel Barn looking west towards site 4A with The Cedars to the immediate right of the photo. Panels and the infrastructure will be visible within meters of Tumbrel, The Cedars and the other buildings on this farm complex.



Tumbrel Barn facing north to The Cedars and plot 4A in the background



This image highlights the tight formation of these three historic Structures. Foreground 'Tumbrel Barn' North West 'The Cedars' North East 'Dairy Barn' These properties are tied in historically yet sandwiched between acres of solar panels proposed on sites 4A and 4B as well as a sub-station and construction compound

10.6 Impacts to Pre-Modern Agricultural Landscape

Site 4 is made up of 12 semi-open and linked agricultural fields growing a rotation of crop including various cereals (wheat, barely, rye and corn), miscanthus and oil seed rape.

These fields rely on circular nutrient management like using animal manure for fertiliser and incorporating fallow periods or planting recovery crops like pasture grass.

The fields have limited borders with some mature hedging, areas of woodland or orchards, water culverts and trees however are mainly open vistas visible from the A140, Hempnall roundabout, B152, Brick Kiln Lane and Church Lane.

As Long Stratton sits low, it is possible to see across from the east boundary of plot 4B at Birck Kiln Lane to the west boundary of Plot 4A and the Hall Farm solar field it abuts to.



Plot 4, on both sites, is Grade 2 BMV and has been farmed for hundreds of years.

Due to hedging, wooded areas, trees lines, unfarmed bands around fields, natural ponds (Sub-site 4A), unnamed water course (Sub-site 4B), the landscape supports high biodiversity and natural habitats.

Many 'at risk' or declining birds and protected mammals can be found on both sub-sites and across the 8km of Cable Route Corridor 4.

Various deer, hares, bats, owls, skylarks, lapwings, turtle doves and many other song birds and mammals rely on the open wildlife corridors and natural habitats for nesting, protection and feeding.

Industrialising these fields will not just change the natural vista of the rural landscape but will remove the wildlife corridors of free roaming mammals and the natural nesting environments for protected birds like the skylark that are found on all the fields and protected across the area.

Industrialising these fields will also remove a sense of belonging, remove the sense of rural living chosen by the people that live and work here.

Landscaping the Scheme to screen the panels and infrastructure will itself change the character of these Claylands.

Changing these fields from agricultural to industrial will also conflict with the Long Stratton Neighbourhood Plan with expansion within the carefully designed by-pass area whilst keeping the sense of belonging to the rural environment.

Site 4 is within the boundary of Long Stratton and acts as a buffer from town to countryside.

Industrialising Site 4 will effectively join Long Stratton to Tasburgh.

This cannot be mitigated against.

10.7 Archaeology

The list of archaeological finds and heritage is vast for what is considered an insignificant place that is only fit for an industrialised energy park.

Yet finds date back as early as prehistoric times; the Bronze Age; Iron Age; Roman; Early, Middle and Late Saxon; the Domesday Book; and Medieval.

Long Stratton has many examples of medieval settlement and homes including:

- The Guild House (NHER [13233](#)), a complex, multi-phase building that dates back to the 14th century when it was used by two medieval guilds. The house has a vaulted wine cellar and the entrance passage to the icehouse in the garden is accessed through the cellars.
- The Old Rectory (NHER [38082](#)), a timber framed Wealden-type house dating from the 15th century. The house has a crown-post roof and would have been a prestigious house in the medieval village.
- Hall Farm (NHER [10070](#)), on the outskirts of Long Stratton, is surrounded by a medieval moat, three arms of which are still water filled.
- The hamlet of Stratton St Michael has shrunk considerably, but earthworks relating to the medieval village have been surveyed around the church with multiple finds from pottery, tofts and manor houses (NHER: 14107, 14118, 14583, 14116, 14117, 16608, 39671, 44503, 10067, 21725, 36819)

Long Stratton has a wealth of interesting post medieval buildings, many of which are timber framed.

- Walnut Tree Cottage (formerly known as Lower Cottages) (NHER [24441](#)) dates to the early 16th century and may be the parlour end of a much larger hall house.
- The Thatched House (NHER [14698](#)) on Church Lane is timber framed and thatched and probably dates back to the 16th century. It may originally have been a hall house, with upper floors and chimney stacks inserted in the 17th century.
- Church Farmhouse (NHER [44413](#)) is a 16th century timber framed farmhouse with an original wooden mullioned window.
- Woodgreen Cottage (NHER [20932](#)) is a 17th century timber framed cottage that may originally have been built as an almshouse. The cottage was converted into a workhouse in 1723, and was sold in 1850 when it reverted to residential use.

The parish contains many timber framed buildings that date from between the 16th and the 18th century, including:

- the Ashford and Grimble's General Store (NHER [15333](#)),
- Thatched Cottage (NHER [15334](#)),
- the Old Manor House (NHER [15336](#)),
- Wild Rose Farmhouse (NHER [15337](#)),
- site of the old Barclays Bank (NHER [44392](#)),
- The Angel Inn (NHER [39792](#)),
- Willow Cottage (NHER [36319](#)),
- the Cedars (NHER [39779](#)),
- the Queen's Head (NHER [44376](#)),
- Corfe Lodge (NHER [44379](#)),
- Well Meadow Cottage (NHER [44382](#)),
- Corfe Cottage (NHER [44384](#)),
- Merrison's Grocers (NHER [44386](#)),
- the old Antique Shop, Jubilee House and the Norfolk Craft Shop (NHER [44395](#)),
- the Swan Inn (NHER [44396](#)),
- Poplars Farmhouse (NHER [44402](#)),
- The Thatch (NHER [44407](#))
- D.S. Warnes and Co. (NHER [44410](#)).
- A windmill and watermill (NHER [15554](#)) are marked close to Mill Farm on historic maps dating back to the 17th century. The timber framed millhouse that still stands on the site dates to the 17th century.



Long Stratton windmill, a late 18th century brick tower mill. (© NCC)

- Cherry Tree Farmhouse (NHER [44383](#)) is an early 18th century house built of clay lump with a central brick chimney stack.
 - Lime Tree Farmhouse (NHER [44398](#)) is also an 18th century clay lump house with the addition of a later brick wing.
 - Belvedere Stores (NHER [44405](#)) is an early 18th century clay lump cottage with modern shop windows.
 - Holly Tree House (NHER [41223](#)) is an early 19th century stuccoed house, with an early 19th century coffin maker's workshop to the rear!
 - The Wesleyan Chapel (NHER [44388](#)) dates to 1830 and has a pedimented brick façade with a central round headed doorway.
 - The Old Court House (NHER [40091](#)) is a 19th century and earlier brick building.
 - Flint House (NHER [42613](#)) is a mid 19th century flint and brick church school that has now been converted into a house.
 - A 19th century red brick icehouse (NHER [7938](#)) now stands close to a modern shopping precinct.
 - Bryant's map of 1826 shows both a post mill and a tower mill on the site of Long Stratton Mills (NHER [3993](#)). The post mill was demolished in the 1870s and the tower mill, which is still standing, continued in use until the late 1920s.
 - Bryant also depicts a post medieval smock mill (NHER [16011](#)) at Mill Yard. The mill was last used in about 1900.
-
- The earliest archaeological finds from the parish include prehistoric pot boilers (NHER [10109](#)), prehistoric flint flakes (NHER [14860](#), [16110](#), [16111](#), [16112](#), [17182](#)), Neolithic flint implements (NHER [10052](#)), a Neolithic stone axehead (NHER [16111](#)) and a polished flint axehead (NHER [34664](#)).

- Three ring ditches (NHER [16838](#), [36355](#)), probably the remains of Bronze Age barrows, are visible as cropmarks on aerial photographs close to the River Tas.
- Other Bronze Age barrows (NHER [10053](#)) were recorded in the parish in the early 19th century.
- A fragment of Bronze Age pottery (NHER [17047](#)) and a Bronze Age spear and knife (NHER [25916](#)) have also been found in the parish.
- Iron Age coins (NHER [25916](#), [35661](#)), pottery (NHER [17047](#), [25916](#)) and metalwork (NHER [12513](#)), including a terret (NHER [16838](#)) and a brooch (NHER [25916](#)) have been found by metal detectorists.
- The presence of Iron Age finds in the area around the site of a later Roman settlement (NHER [39671](#), [44502](#)) along the Pye Road suggests that there may have been Iron Age settlement activity in this area.
- The Roman road (NHER [7947](#)) runs between Scole and the Roman town of 'Venta Icenorum' at Caistor St Edmund.
- Fieldwalking and metal detecting evidence suggests that there was a substantial Roman settlement at Long Stratton, and a large number of Roman finds including pottery, coins, brooches and bracelets (NHER [12513](#), [25916](#)) have been found in the area.
- Roman pottery (NHER [10054](#), [10057](#), [10105](#), [12510](#), [12511](#), [14104](#), [14118](#), [16110](#), [17047](#), [17182](#)), coins (NHER [10055](#), [12512](#), [14114](#), [16838](#), [25300](#), [33205](#), [34467](#), [35894](#), [36595](#), [36547](#)) have been found scattered throughout the parish.
- Other Roman finds include a brooch in the shape of a pouncing lion (NHER [34468](#)), a bracelet (NHER [14107](#)), a silver finger ring (NHER [18273](#)), an openwork key handle (NHER [34469](#)) and slag from metal working (NHER [14105](#)).
- A possible Roman field system (NHER [36355](#), [36354](#)) is visible as cropmarks on aerial photographs close to the site of a Roman settlement in the adjacent parish of Morningthorpe (NHER [10178](#)).
- In 1773 a Roman 'hearth' was discovered in a gravel pit (NHER [7937](#)). Subsequent investigation on site revealed possible Roman pits containing fragments of pottery and a horse skull.
- Little is known of Early and Middle Saxon settlement in the parish. However early Saxon brooches and a girdle hanger (NHER [16838](#)), a wrist clasp (NHER [25467](#)) and a Middle Saxon brooch and coins (NHER [12513](#)) have been recovered.
- During the Late Saxon period settlement probably developed on the sites of the present villages of Long Stratton and Stratton St Michael.
- In 1086, **the Domesday Book** records Stratton St Mary and St Michael in the hands of a number of landholders, including several religious houses, Count Alan and Roger Bigot.
- The holdings were all relatively substantial and included a mill, woods and meadows.
- Late Saxon finds from the parish includes a Late Saxon finger ring (NHER [12513](#)), a stirrup strap mount (NHER [14106](#)), a strap end (NHER [16111](#)), a brooch (NHER [16838](#)), an openwork mount (NHER [25691](#)), fragments of pottery (NHER [14108](#),

[14110](#), [14113](#), [14115](#), [14117](#), [25916](#)) and a silver coin dating from the reign of Athelred II (NHER [24599](#)).

Norfolk Heritage Explore Map

Sub-site 4A and B sits astride the A140 which is also a Roman Road

Archaeology site 1 on Site 4A:

NHER 10163 Roman Pottery 43AD-409AD

- Gravel pit 457m south of Stratton Bridge
- Yellow-brown Roman sherd found 61cm below surface

NHER 16110 Multiperiod finds

- Prehistoric flint flakes and fragments of Roman, medieval and post medieval pottery found during fieldwalking
- Prehistoric 1000000BC to 42AD, Roman 43AD-409AD, Medieval 1066AD-1539AD, Post Medieval 1540AD-1900AD
- Southeast corner of field west of A140
- 3 leadglazed earthenware sherds, 2 stoneware sherds, 1 rim with crowned AR
- 8 flint flakes, 1 medieval sherd, 1 Roman greyware sherd

NHER 16112 Prehistoric Flint Flakes 1000000BC-42AD

- Westside of A140 on field surface found whilst fieldwalking
- 16 flint flakes
- Flake - lower Paleolithic to late Iron Age, 500000BC-42AD

NHER 56547 Former site of 18th century milestone marking Norwich 9 miles and Ipswich 34 mile

- One of 14 surviving milestones along the former Norwich to Scole Turnpike.
- Turnpike created in 1768/1769 and lasted for 106yrs

Archaeology site 200m south of Site 4a at Brands Lane

NHER 64579 Monument; potentially prehistoric ring-ditch and area of probable medieval settlement and associated field system

- A geophysical survey of these three fields undertaken between late 2017 and early 2018 identified a range of potentially archaeologically-significant anomalies. Of particular interest was a curvilinear anomaly that potentially represents a ring-ditch or circular enclosure of prehistoric date.
- A complex of enclosures identified adjacent to the Norwich Road is likely to represent and area of former settlement and coincides with a scatter of medieval pottery recovered during fieldwalking in 1978 (see NHER 14119). Boundaries defining a series of narrow plots or fields extending back from the road were also detected. These were also probably medieval in date and it is clear that a number of the extant modern boundaries were once part of the earlier field system. A number of possible pits were also identified and a distinctive anomaly at the western end of the middle field may represent the remains of a hearth or kiln-type feature.

NHER 14119 Medieval pottery

- Fragments of medieval pottery 13th-14th century
- Found fieldwalking on a ploughing surface

Achaelological site 100m to the east of A140 and plot 4a

NHER 15042 Medieval and post medieval pottery

- 4 medieval sherds c1066-1546
- 1 sherd c18th stoneware
- 2 glazed post medieval sherds c1540-1900AD
- 3 lead glazed earthenware

NHER 15978 site of post medieval wind mill c1540-1900

Norfolk Heritage

Site 4B

[10163](#) (Find Spot) Roman pottery

[15042](#) (Find Spot) Medieval and post medieval pottery

[15042](#) (Find Spot) Medieval and post medieval pottery. Adjacent to woodland

[14110](#) (Find Spot) Multi-period finds. Just North of Church Lane.

[14861](#) (Find Spot) Medieval and post medieval pottery

[17182](#) (Find Spot) Multi-period finds from southwest corner of field east-northeast of church.

[16109](#) (Find Spot) Medieval and post medieval finds

[44503](#) (Monument) Medieval features,

[15978](#) (Monument) Site of post medieval windmill. Just North of the Cedars.

[56547](#) (Monument) Former site of 18th century milestone marking Norwich 9 miles and

Ipswich 34 miles . At roundabout where it is suggested that access to site 4b would be made.

[36355](#) (Monument) Cropmarks of ring ditch and possible Roman field system

10.8 Community Identity and Well-Being Rooted in Cultural Heritage and Historic Landscape

The community of Long Stratton was born out of joining the villages of Stratton St Michael at the northern end with Stratton St Mary at the southern end, creating the Conservation Area in between.

Long Stratton is surrounded by small hamlets and villages using the local facilities and forming the greater community of this developing village into a town.

However Long Stratton has been shaped by:

- Centuries-old agricultural landscapes;
- Historic field patterns and ancient hedgerows particularly seen across cable route 4;

- The visual presence of Grade I listed St Mary's Church with its round tower;
- The Sextons Wheel, one of only two in the country, located in St Mary Church and adopted as the town's sign and name of the village's magazine;
- St Michael's Grade I listed church in Church Lane and the surrounding listed properties dating back centuries;
- The Roman road that, up until 2025 bypass, dissected the village centre however offers centuries of history and archaeological finds;
- Generational farming of land use;
- Shared cultural history of working the land;
- A community of multi generations that support each other and come together to celebrate events across the annual calendar including the Remembrance Day parade to the war memorial.

This is not just a place where people live and the fields are not just scenery.

Rural communities are embedded far more than those in cities and larger towns.

They possess a distinct sense of identity, characterised by a deep, emotional connection to a specific, often intergenerational place.

The identity is built upon shared values, local traditions and agricultural heritage.

Chapter 11: Transport and Access

Introduction

The East Pye Solar Project NSIP seeks to establish a 500MW solar project and Battery Energy Storage System (BESS) across nearly 1,100 hectares of rural land in South Norfolk in areas surrounded by small single lanes and key access routes for local resident and business movement.

Site 4 comprises of parcels 4A and 4B;

- Is strategically located towards the north **boundary and buffer zone of Long Stratton Neighbourhood Plan** and south of Tasburgh Village;
- Site 4 is surrounded by Listed buildings of Grade I, Grade II* and Grade II with open and uninterrupted views of open fields;
- The site is directly bisected by the very busy A140 (Norwich Road), a critical arterial route from Norwich to Ipswich and the northern access/exit route of Long Stratton itself;
- Site 4 sits at the **southern approach and the northern exit of the Long Stratton by-pass**;
- Site 4 is on the northern approach to the very busy 4 exit **Hempnall roundabout**;
- Site 4B is bounded by the busy **B1527 Bungay Road**;
- Access to **site 4A** is from a newly created **5th junction on the Hempnall roundabout**;
- Access to **site 4B** is from the **B1527**;
- Transport associated with the scheme at both sites will cause an **increase in congestion**, an **increase in air pollution** and potentially **reduce road safety** due to location of site access points;
- **Traffic monitoring** appears to have been done **prior to the construction on the Long Stratton by-pass** with no monitoring since the by-pass has been open;
- **No monitoring of the Long Stratton by-pass** has taken place;
- **No traffic count** has been assessed at the junction of **Brick Kiln Lane** to access local businesses and residents;
- **CRC4 Abnormal Indivisible Load (AIL)** will be accessed via Hall Lane, a single-track lane with bridge over the Long Stratton by-pass;
- **Hall Lane** was only accessed with traffic tubes in May 2026;
- **Access to Hall Lane** (Ipswich Road north and south of Hall Lane through Long Stratton Conservation Area) was monitored via traffic tubes in May 2026;
- **CRC4 access is via a haul road** across the cable route corridor from A140, south of Long Stratton and the by-pass;

The A140 south - B1527 requires further assessment as the cumulative schemes accessing Sites 2A, 2B, 2C, CRC3 and CRC4 exceeds the IEMA EATM guideline thresholds of more than 10% flow increase on links with receptors of High Sensitivity.

As the A140 is a major haul road and the main access route to most of the scheme this is a major flaw and demonstrates lack of in-depth transport surveys were taken.

The introduction of such a large-scale industrial project in this specific rural location raises significant concerns regarding:

- The cumulative traffic impacts;
- The capacity of narrow country lanes to manage heavy construction vehicles;
- **Wear and tear to narrow lanes** and roads not designed or structured for such HGVs and AILs;
- Sites 4A and 4B proximity to the A140 as a Major Road Network brings specific challenges related to construction access;
- Potential temporary road closures and traffic management issues during the installation of panels, substation and underground cabling;
- **Site 4A access A19 will also be used as a holding site for sites 7A-F**
- Cable Compound 1 will be the start of the cable corridor haul road with all vehicles doing a **U-turn on the Long Stratton by-pass** whether to access it or when leaving;

This highlights the tension between achieving national renewable energy targets and the potential long-term alterations to the rural character, traffic and transport infrastructure around Long Stratton and surrounding villages which will be repeated 2-3 times during the operation of the scheme as panels require replacing and without consideration of increased traffic from the Long Stratton expansion plan.

11.1 Impacts on Road Network

While construction deliveries are planned to avoid peak hours (08:00–09:00 and 17:00–18:00), the sheer scale of the project across all sites including 4A/4B will increase heavy goods vehicle (HGV) movements through the Hempnall roundabout, the B1527 and the Long Stratton by-pass. This also may include Saturdays until 1.30pm with AILs potentially outside of these times.

Construction workers will arrive between 06:30-08:00 and depart between 16:30-19:00.

Key Considerations for Road Impacts around 4A and 4B:

- **A140 Connectivity:** The direct intersection of the site by the A140 means construction traffic will closely involve this major route and will be a main route for other sites across the scheme for the duration of construction - **24 months**;
- **Traffic assessment has not been made for the Long Stratton by-pass;**
- Growth in traffic flow has been predicted for 2029 but **no traffic flow has considered the Long Stratton by-pass**;
- There are **600+ homes at Tharston Park** (all with solar on their roofs) that are either built or in construction phase; that borders near the western boundary of site

4A at Brand's Lane; with a site access off the northern approach roundabout of the by-pass and 300m from the Hempnall roundabout. **No growth in traffic has**

considered the increase in housing over the next 5 years;

- 1200+ homes, a school and community/business hub is planned for the land internal to the by-pass as part of the **Long Stratton Neighbourhood Plan**. Although still in early the planning stage this has not been considered within traffic predictions for construction and town growth;
- **A140 (S-B1527) is considered High Sensitivity** (East Pye Solar) as it passes through residential and commercial areas with high pedestrian footfall and frequent frontage development;
- **Hempnall Roundabout:** This roundabout is a significant point in the location of Site 4A and 4B and serves in excess of 20,000 vehicles per day. Prediction for this roundabout in 5 years was not of significant growth but did not consider the Long Stratton Neighbourhood Plan growth in housing nor the by-pass increasing through traffic that once avoided a congested route through Long Stratton;
- **Hempnall Roundabout was created in 2019** due to the previous crossroads being an **accident hotspot**;
- **Access to Site 4A:** A newly created 5th entrance/exit will have a major impact to the flow of the Hempnall roundabout increasing congestion, air pollution, dirt and dust whilst reducing road safety;
- **Construction Compound and holding site:** Site 4A will be the new location for the construction compound previously due to be sited on 4B. It is also nominated as a **holding site for HGVs for site 7A-F** to await a call-forward to site. This will further increase the construction and HGV traffic entering and exiting site 4A and putting even more pressure on the Hempnall roundabout and the B1527. **This has not been part of the targeted consultation;**
- **Site 4A Construction Compound will also be a receiving point for Abnormal Indivisible Loads (AIL)** from the A19 access point off the Hempnall roundabout on the A140. **This was not part of the targeted consultation;**
- **Access to CRC4 Compound 1 A09 is via the A140 south of Long Stratton and the by-pass:** from the south, u-turning on the Long Stratton by-pass roundabout at Parker's Lane and back to Cable Compound 1. Exit the same way. The by-pass is a two way carriageway and the main route north and south between Norwich and Ipswich with a continuous flow of traffic. This will put excessive stress on the by-pass, increasing congestion as the turning circle on the roundabouts are tight therefore slowing traffic down, causing an increase in air pollution and potentially reducing road safety. From the north, along the by-pass and onto site whilst exit is down the A140, U-turn at the B1134 roundabout and return up the A140 northbound along the by-pass. **This was not part of the targeted consultation;**
- The A140 will be the main transport route to all sites and CRC on the scheme. Mass extra haulage to sites will utilise the by-pass further putting strain on this two-way road and local routes in the area.

- Access to Cable Compound 2 Mill Road is either from haul road via compound 1 or via haul road from Site 4B. **This was not part of the targeted consultation;**
- AIL to CRC4 is via Hall Lane, Long Stratton that will be reached from the by-pass, turn off at Parker's Lane roundabout and the Ipswich Road to Long Stratton. Hall Lane is a single-track lane that has been re-configured to cross the by-pass by a bridge built to national standard;
- **Access to Site 4B A20:** The route is from the A140 Hempnall roundabout, eastbound on the connecting route of B1527, with all HGV, AIL and construction traffic required to cross the carriageway on a 60mph road. Exit of site is in reverse and pulling out onto the road will require traffic management which will increase congestion, frustration and reduce road safety;
- **Village Connectivity:** Parcels 4A and 4B are sited towards the northern boundary of Long Stratton which is a major facilities hub for the local village network including Hempnall, Tasburgh, Morningthorpe, Fritton, Newton Flotman, Saxlingham Nethergate, Wacton, Tharston, Pulham, Great Moulton and beyond. With access from the north via Hempnall roundabout and local cut through of Church Lane and Mill Road/Hall Lane whilst access from the south will be via the by-pass;
- **Increase in heavy vehicle traffic** will impact minor local lanes used by residents and tourists;
- When the A140 is closed, **local lanes soon become cut-throughs and grid lock ensues.** An accident on the by-pass in December resulting in the road closed for most of the day with local lanes bearing the brunt and congested for most of the day;
- **Wear and Tear to local road networks:** local lanes are not constructed to sustain heavy vehicle traffic and excessive weighted vehicles;
- **Road widening and layout change:** roads will be either widened to accommodate HGVs or naturally eroded at curbside by wider vehicles to allow for two-way traffic. Damage to roadside will make the roads dangerous and damaging to normal vehicles and smaller road users like bikes;
- **Infrastructure Creep:** In addition to panels, the Cable Route Corridor 4 requirements, connecting the sites, will necessitate temporary disturbances along road verges, crossing narrow lanes, closing key transport routes for residents trying to go about their daily life. **A haul road through the CRC4 is now planned and was not part of the targeted consultation;**
- **In Norwich:** While the main sites are south of the city, supply chain logistics and "off-site support" may increase traffic near southern business parks, potentially affecting delivery times for Norwich-based firms using the A140.
- **A140 is the main route used by all emergency services** in particular ambulances to and from the NNUH. Increase in construction traffic across the scheme will have a potential impact to the response times of emergency services;

East Pye themselves admit that the impact will have a negative effect. But their 'temporary impact' will be across the construction time of the scheme of at least **24 months**, on multiple local roads, especially as the A140 and B1527 will be used as main haulage access routes for the northern section of the scheme and the A140 for the whole of the scheme.

Construction Phase: Temporary increases in traffic volumes, particularly from HGVs and ALLs transporting materials and equipment, will lead to congestion, increased wear and tear on local roads, and disruption to access for local residents and businesses. There will also be short-term detrimental road safety associated with construction traffic movements.

Operational Phase: As the panels and infrastructure have a limited life expectancy, they will require replacing during the 60-year lifespan of the scheme.

Panels will require changing 2-3 times, as will the batteries. Local residents therefore can expect further disruption, with predictions of 100 two-way HGV vehicles journeys across the scheme during replacement approximately every 15 years, across the scheme with increased haulage and ALLs manoeuvring the quiet, narrow country lanes.

Decommissioning phase: like the construction phase, decommissioning activities will result in temporary increases in traffic volumes and associated disruption to local access and road safety for up to 24 months.

11.2 Proposed Road Straightening and Widening

The project will require significant highway works to facilitate access for construction vehicles and the installation of underground cabling.

The project necessitates widening existing roads, removing vegetation, (many veteran and ancient oaks and hedgerows live at the roadside along the route) and removing street furniture to allow for Abnormal Indivisible Loads (AILs) for transformers and cable drums.

Key impacts on infrastructure at sites 4A and 4B plus the CRC4 include:

- **Road Widening and Highway Changes:** Hempnall roundabout will be adjusted to accommodate clear line of sight and construct a 5th exit, A19;
- **Construction Vehicle Access:** Access routes have been altered and include a holding site at sub-plot 4A and AIL delivery area;
- **Construction Vehicle Access A20:** B1527 will require removal of vegetation for access and visibility;
- **CRC4:** Internal haul road 7.5m wide will be used to access the cable route crossing multiple small, single-track lanes that serve the local rural residents and local businesses daily and with limited visibility in many places;

- **Brick Kiln Lane:** access to the CRC4 at Brick Kiln Lane via Brick Kiln Lane has been ruled out. **Edges Lane possible alternative route;**
- **Alternative route at Edges Lane:** high volume of above highway tree trimming, overhead power lines, very narrow highway (single track lane with few passing points), trees close to carriageway in places restrict access to Brick Kiln Lane. **Road layout has altered since construction of Long Stratton by-pass. Not surveyed and to review IF road reopens to traffic. Not part of targeted consultation;**
- **Edges Lane** will no longer be a through route as the by-pass dissects it. There is no connection to Edges Lane from the by-pass. **Layout not surveyed;**
- **Edges Lane crossing:** visibility issues due to curvature in road. Removal of vegetation and trees;
- **Brick Kiln Lane Crossing:** on a tight bend with avenues of lime trees and Devils Loke PRow. Vegetation removal;
- **Hall Lane:** Above highway tree trimming and removal of mature hedgerow at junction access point A14 at Parker's Lane to allow for turning onto CRC4 haul road;
- **Hall Lane A14 proposed access for AIL:** low loader length 26.48m and 4.54 width to access haul road. Access 120m from the blind bend at Mill Cottage and the mill, 60m from Parker's Lane. Hall Lane is a maximum of 4m wide excluding passing areas. **There was no consultation on access to haul road.**
- **Norfolk CC indicated that haul roads across the scheme would be required to avoid using local lanes but if the local area had been surveyed it would have been obvious that in this area, access to specific sites would not be possible without haul roads and this has not been part of public consultation;**
- **It is not possible to access CRC4 due to the by-pass after Church Lane at the northern end and until Wood Lane at the southern end. By-pass plans would have shown no access points and in person surveys after the by-pass opened in August 2025 would have made this obvious. There was no consultaion on the haul road;**
- **Hall Lane:** widening of entrance corner at top of Hall Lane to allow for AIL cable vehicles turning. This is on the immediate boundary of the Long Stratton Conservation Area and borders peoples homes;
- **Hall Lane not surveyed** due to by-pass construction and hasn't been since;
- **Hall Lane:** Planned route for **AIL (total weight 78.3te) although not surveyed and weight limit on bridge is 44te;**
- **Hall Lane:** **no survey** has been taken into account the change in road layout from straight lane to winding lane and construction of the by-pass bridge

- **Mill Road Access A16:** Although EPS state visibility achievable with vegetation clearance (**not previously consulted on**) this isn't true and will be blocked by Harveys Lane PRow woodland as road curves.
- **Mill Road A16:** Close to the entrance of Mayfield Farm, a residential complex of 3 homes and equestrian facilities. CRC4 haul road to Cable Compound 2.
No targeted consultation;
- **Parker's Lane Access A15:** vegetation removal of mature hedgerow to achieve 90m visibility. Roadside Nature Reserve is along both sides of the road heading south along Parker's Lane. **No targeted consultation for this point;**
- **Parker's Lane Access A13:** vegetation removal of mature hedgerow to achieve 90m visibility. **No targeted consultation for this point;**
- **Wood Lane access A12:** visibility at the 6.5m crossing can be achieved with vegetation clearance. **No targeted consultation for this point;**
- **Common Road access A11:** It appears Wood Lane from A140 to Common Road will be used to access the haul road at access point A11. **This has not formed part of the targeted consultation**
- **A140 A09 Compound 1:** Long load 26.48m x 4.54m wide into 7.5m haul road. A140 is a national speed limit busy road and multiple HGV traffic. **This has not formed part of the targeted consultation**



Location of Mill Lane A16 and CRC Compound 2 looking east where the visibility spay is limited as the road dips, turns and is shielded by wooded areas both sides.













Hall Lane A14 on blind bend at junction of Parker's Lane and 60m from blind S bend at Mill Cottage



Eastbound approach to by-pass bridge at Hall Lane



Westbound approach to by-pass at Hall Lane





Parkers Lane A15, single track lane and the ONLY access to Wood Green North. Important hedgerow, Roadside Nature Reserve, PRow and 3m deep drainage ditch

11.3 Impacts on Existing Traffic

Key Effects on Hempnall Roundabout

- **Serves more than 20,000 vehicles per day** although no data is available since the opening of the by-pass
- **Creation of 5th exit:** the busy 4 exit will increase to 5 to access site 4A access point A19;
- The **construction compound** and holding area for haulage to site 7A-F will be located now on site 4A adding to construction traffic for other sites. **This does not form part of the targeted consultation;**
- **Abnormal Indivisible Loads (AILs):** the Hempnall roundabout will be a primary navigation point for extremely large vehicles carrying transformers and cable drums, with some loads expected to reach **4.9m wide and 26.5m long**;

- **Infrastructure Modifications:** To accommodate these AILs, HGVs and construction traffic, the project proposes **widening existing roads** and potentially removing street furniture and vegetation around the roundabout area to increase line of sight;
- **Traffic Congestion:** congestion will increase due to the amount of haulage vehicles and additional access on the roundabout which will increase travel times and air pollution. It has a potential to negatively affect road safety;
- Consideration has not been given to the **increase in housing as part of the Long Stratton Neighbourhood Plan** with increase in road users;
- **No road surveys have been conducted since the Long Stratton by-pass opened** and due to construction traffic and normal congestion through Long Stratton, sat nav routes would direct traffic away from this busy route;
- **The sites that will be routed through the Hempnall roundabout are:**
 - 1A-D, 2A-C, 4A-B, 5A-B, 7A-F
 - BESS Site - adjacent to sub-site 1A-B
 - CRC Compound 1 (east of A140, opposite Sub-site 2C)
 - CRC Compound 2 (north of Mill Road)



Access A19 to site 4A



Figure 2.1: MCC Baseline Flows - Hempnall Roundabout (24hr, all vehicles)

Image shows the flow of traffic on Hempnall Roundabout

Effects on Hall Lane C355

Hall Lane is a C-road, single track lane that, prior to reconfiguration of the A140 due to the by-pass, was relatively straight.

Hall Lane is now proposed as a new transport route (Targeted consultation October 2025) due to its proximity to CRC4 Compound 2 in Mill Road and in relation to the newly opened **Long Stratton Bypass**.

Hall Lane has not been surveyed due to the construction of the by-pass and has not been since the opening of the by-pass.

- **New Bridge Infrastructure:** a new **Hall Lane bridge** was designed to carry **local traffic and pedestrians over the new bypass**. It is built to national standard of 44T;
- Hall Lane snakes on both approaches of the bridge;
- Hall Lane is 40mph however it is likely that the average speed is more likely to be 20mph due to the narrowness, limited passing points and blind corner at Reeves Cottage on the east side of the bridge;
- This bridge serves as a key route between the town and the rural properties and areas of Fritton, Morningthorpe, Wood Green, Shelton and Hardwick;
- Hall Lane is the main route for the mill and the many tens of mill haulage that travels to and from the mill daily;

- **Abnormal Indivisible Loads (AIL):** Hall Lane is the proposed AIL route to CRC Compound 2. The AIL size is 26.48m x 4.54m;
- To access Hall Lane, alteration to the entrance to the lane by removing a grass verge to widen the access which is at the boundary of the Long Stratton Conservation Area;
- Mill lorries struggle to exit Hall Lane due to the tight turning circle onto the Ipswich Road and take up both sides of the road as a result. These are smaller than the planned AIL vehicles.



Hall Lane



Ipswich Road with Hall Lane. The start of the conservation area

Effects on Long Stratton Town

The town itself faces a shift in its character as it transitions from conservation village to a town, with the Long Stratton Neighbourhood Plan and the Long Stratton Community Project mapping the controlled growth and ensuring the village character and community spirit remains.

The East Pye Solar scheme will turn this beautiful historical village to a "drive-through town" and one "surrounded" by renewable infrastructure which is in complete contravention to the adopted Long Stratton Neighbour Plan.

- **Bypass Interaction:** The project's success in minimizing disruption depends on the Long Stratton Bypass which opened in August 2025 to redirect A140 traffic;
- Construction traffic for East Pye Solar is expected to use the A140 as a main transport route across the scheme.
- The bypass will be the route to reach sites 4A and 4B and other sites across the scheme;
- **A140 (S-B1527) is considered HIGH SENSITIVITY and required further assessment;**
- **Cumulative "Industrialisation":** Residents have expressed concerns that Long Stratton will be effectively **encircled by solar panels**, with East Pye Solar to the east and the proposed **Tasway Energy Park** (3,600 acres) to the west, now paused but reliant on East Pye Solar infrastructure. Industrialisation construction traffic could be impacting this town and the by-pass for 10 years and during operation, if other proposals are also passed;
- **Traffic Management:** To protect the town's environment, a Construction Traffic Management Plan has been proposed to coordinate HGV movements, specifically avoiding peak hours (**08:00–09:00** and **17:00–18:00**). However, traffic build up tends to start before 8am due to commuting to Norwich and much earlier than 17:00 hrs due to school children's pick-up times and school buses from the high school;
- **No traffic management surveys have been done for the by-pass;**
- No consideration has been given to the **increase in vehicles due to the new housing** (600 already built or in construction) in particular projecting forward 5 years.

Effects on B1527 Bungay Road to Hempnall

The B1527 connects to the A140 at the Hempnall roundabout. It is a two-way road that undulates and bends.

It serves as the main connecting route to and from Hempnall and on to Bungay. It acts as a link to hamlets and villages in the area that need to reach the A140 to Norwich or southbound, as well as the local facilities at Long Stratton.

It is a 50mph road reducing to 40 and 30mph with multiple businesses along the stretch including Jack in the Box nursery. Small single-track lanes and PRoW can be found off the road as well as field tracks and agriculture vehicles use the lane to move between fields.

- B1527 Bungay Road includes access point A20 to Site 4B just east of the Hempnall roundabout;
- All construction traffic for A20 will require travelling east from Hempnall roundabout and crossing the carriageway into A20;
- Brick Kiln Lane is located 100m from A20 and is a small but busy lane used by local businesses and residents as an access route to Morningthorpe;
- Brick Kiln Lane also serves the school bus;
- No traffic assessment has been done at the entrance to Brick Kiln Lane which is also on a bend surrounded by woodland either side;
- Access point A23 and A24 to site 5A and B a few hundred metres further along B1527 also will require construction traffic and AIL to cross the carriageway;
- Further access to site 5 at access points A25 and A26 require again crossing the carriageway at The Street;
- As site 4A is a holding compound for sites 7A-F, all construction traffic for a further six sites will also manoeuvre along B1527 making it a total of 10 sites/sub-sites using this busy and crucial access road with exit journeys also in reverse;
- **The B1527 was not part of the targeted consultation for access to sites 7A-F**

HGV and Vehicle Movements:

East Pye Solar state the **daily** movements are:

- 69 HGVs will arrive and depart across the scheme = 138 in total
- 205 daily cars/shuttles/LGVs will arrive and depart across the scheme = 410 in total
- **Hempnall Roundabout will be impacted by:**
 - 4 HGVs (4A)
 - 6 HGVs (4B)
 - 10 HGVs (5A and 5B)
 - 10 HGVs (7A-C)
 - 12 HGVs (7D-F)
 - **Total extra HGVs = 42 two-way traffic**
 - 16 other vehicles (4A)
 - 22 other vehicles (4B)
 - 32 other vehicles (5A and 5B)
 - 36 other vehicles (7A-C)
 - 42 other vehicles (7D-F)
 - **Total other vehicles = 148 other vehicle two-way journeys**

- In fact, the impact will be greater as the HGVs will be using compound at 4A as a holding area. Therefore, including that, the impact to the roundabout for sites 7A-C will be another 11 giving a **total of 53 HGVs**

Cable Route Corridor 4

Peak daily HGVs two-way:

- To Compound 1 A140 = 22
- To Compound 2 Hall Lane = 22
- **Total accessing Compound 1 = 44 two-way HGV journeys Daily**

Peak Daily LGVs two-way:

- To Compound 1 A140 = 10
- To Compound 2 Hall Lane = 10
- **Total accessing Compound 1 = 20 two-way LGVs journeys Daily**

Peak Daily other vehicles:

- To Compound 1 A140 = 20
- To Compound 2 Hall Lane = 20
- **Total accessing Compound 1 = 40 two-way other car journeys Daily**

That makes a total of:

- To Compound 1 A140 = 52
- To Compound 2 Hall Lane = 52
- **Total accessing Compound 1 = 104 two-way vehicles Daily**

Abnormal Indivisible Loads (AIL)

Numbers for AILs have not been included or confirmed in the DCO

- AIL loads will be required for sub-site 4B for the transportation of transformers for the 132kV substation;
- AIL loads will be required for site 5A for the transportation of transformers for the 400kV substation;
- CRC4 to compounds 1-3 for the transportation of transformers of 132kV and 400kV cable drums;
- Large plant may also transported by AIL

Routes as follows:

- Sub-site 4B - north or southbound on the A140, eastbound on B1527, south onto A20 access. Depart the same way;
- Sub-site 5A-B - north or southbound on the A140, eastbound on B1527, south onto A23 or A24. Depart the same way. This will impact the Hempnall roundabout;
- CRC Compound 1 (A140) - north or southbound on A140, east onto A09. Depart the same way in reverse;
- CRC Compound 2 (Hall Lane) - north or southbound on A140, Norwich Road, The Street, Ipswich Road, east on Hall Lane, south onto A14. Depart the same route in reverse.

11.4 Impacts on Public Rights of Way

There are many PRow associated with Site 4 and the CRC4. Access to the compound in Mill Road will be via a haul road along CRC4 is planned which will incorporate multiple PRow and bridlepaths:

- Long Stratton PRow 3 and PRow 4 cut through site 4B in a north/south direction and east/west respectively;
- Boudicca Way navigates to the east of site 4B and joins parts of CRC4 at different intervals including at Parker's Lane, Wood Green, Tyrell's Wood;
- Harveys Lane is a bridleway and public footpath on Mill Road opposite Mayfield Farm drive entrance and adjacent to CRC4 and the construction compound;
- Many horse riders use the multiple bridleways and quiet lanes to exercise their horses;
- Many walkers of all ages including older people, school age children use these PRow daily to traverse the fields to bus stops, recreationally or to journey to work or school. They are considered safe yet will be cut off by the fenced haul road pushing people onto roads and lanes that will have excess traffic due to pressures of the scheme.

The permanent 132kV substation is located adjacent to the PRow 3 and PRow 4 therefore they will not be accessible during construction or considered restricted and unappealing. This will be considered a **High Sensitivity Receptor** during construction and decommissioning.

As access to site 4B has been proposed off B1527 to the substation, large numbers of HGV and AIL traffic will be creating dust, noise and pollution to the current open and quiet space. Crossing the road to the PRow 3 will be too dangerous.

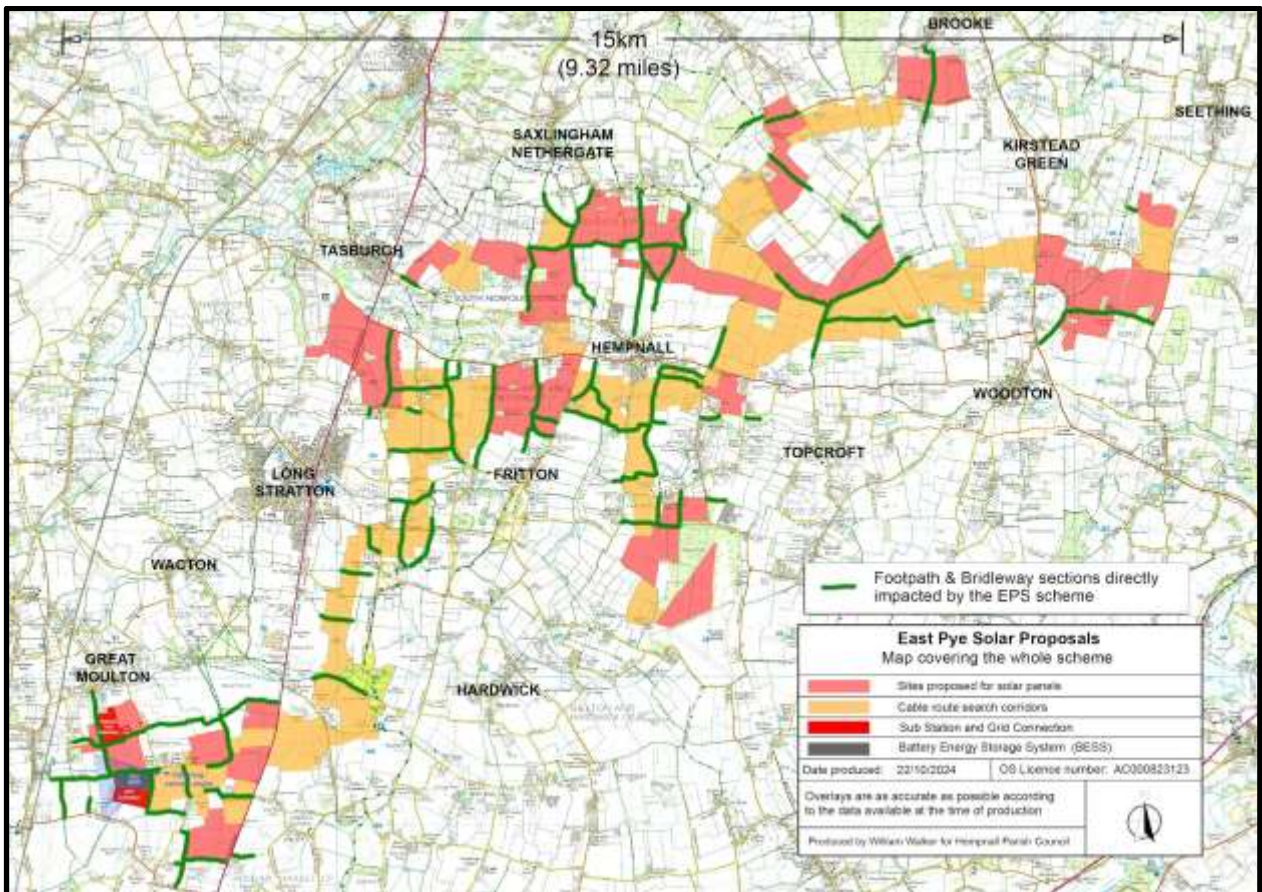
During the operational phase the industrialised area will be fenced on one side with deer fencing and CCTV after construction making it an undesirable walking route in comparison to current open views and feeling of space.

It could also be considered **unsafe** as it **restricts an 'escape route'** and **'line of sight'** by the infrastructure if a user were found in a vulnerable position.

PRoW 4 will be impacted making it not accessible during construction and decommissioning whilst restricted and an unattractive place to walk during operation also making this a **High Sensitivity Receptor**.

Multiple PRoW (15) will be temporally or permanently affected during the construction, operation and decommissioning of the scheme relating to site 4 and CRC4 changing the nature of the local countryside and the mindful recreation it currently offers.

People choose to live in the countryside and rural environments to benefit from nature, peace and quiet as well as the feeling of space and escape.



11.5 Impacts on Pedestrians and Children

There are no pedestrian pavements on the B1527 but walkers **will cross this road to access the PRoW3 where the access point is to sub-site 4B**.

There is a pavement along the A140 opposite the entrance to Timbrel Barn and the other residential properties along this part of the Norwich Road. **Since the by-pass, crossing the**

road at this point has become more challenging. This pavement is within 100m of site 4 and specifically the entrance to sub-plot 4A

Brick Kiln Lane is a quiet single track country lane with a number of residential properties and businesses where walking on the road is normal due to no pavements. This will be too dangerous with construction traffic.

Church Lane, on the south boundary has multiple residential properties, all listed, and walking in the lanes is quite normal. It is also served by St Michael Church, Grade 1 listed and PRoW cross Church Lane

The CRC4 also crosses the lane with haulage traffic making this lane too dangerous to use.

CRC4 crosses a total of 8 highways as well as the A140 twice at the northern connection from 4B to 4A and at the southern cluster to 2C. There is a PRoW at this point where people walk to Goodies and Tyrrel's Wood.

As the lanes along the CRC4 are quiet people walk along them as a means of connectivity from one place to another. Increase in haulage not just along the lanes but also across the fields will make this area dangerous to walkers, cyclists, horseriders.

11.6 Impacts on Cyclists

The lanes across the scheme are a cyclists' dream due to being flattish, quiet and safe.

The Rebellion Way Circular Norfolk route passes via Long Stratton.

An increase in haulage traffic will make these relatively safe roads more dangerous and unattractive for use.

11.7 Parking for East Pye Solar Workers

According to East Pye Solar, an average of 258 workers will be on site daily with a maximum of up to 479 per day.

Although it has been suggested that bussing in workers wherever possible will be looked at, moving them across the scheme will impact local road networks and buses and minivans will still need to be parked.

Compounds across the scheme will be used as personnel hubs and car parks.

11.8 Local Bus Transport

Site 4 straddles the A140 and the main bus route 36A to Norwich for commuters, school and college students, shopping as well as for recreation use.

With the entrance/exit to site 4A planned for off the Hempnall roundabout as well as the increase in HGV and AIL loads to various sites across the scheme that will also use the A140, including accessing Fairstead Lane for site 7 a few hundred meters away and where a bus stop is located, the local bus network will be impacted. This will cause delays to many bus users that rely on the service to get to places on time.

The 36A route is from Harleston to Norwich Bus Station and is the main bus route connecting the area to the county capital for schools, colleges, work and recreation. The route comes through Pulham Market along Common Road and Wood Lane past Goodies before joining the A140 a few hundred metres from the CRC Compound 1 entrance. If Common Road is closed for the CRC4 haulage route or there are road closures at the Compound entrance as suggested in the documents, the bus route will be either delayed or rerouted. This will cause considerable disruption to people's ability to carry on with life; school, college and work.

11.9 Traffic Impact on Businesses

The Hempnall roundabout serves c20,000 vehicles in all directions including commercial, HGVs, service industry and emergency services; police, fire and ambulance. Adding an access point on this roundabout not only will cause traffic congestion that will cause delays to local and other businesses as they pass through this significant junction.

Congestion will also cause vital delay to emergency response times.

Brick Kiln Lane on B1527 is 200m from the site access for sub-plot 4B. A narrow entrance on the curve of the B1527 leading to a single track lane and access point for many businesses including:

- Colorcote with multiple commercial vehicles using the junction daily;
- Simon's Coaches uses Brick kiln Lane as school bus route;
- The Hollies is a mental health facility that requires access for residents, visitors and staff as well as emergency services;
- Brick Kiln Pottery

Brick Kiln Lane is also an access route to the top of Church Lane and further along to Morningthorpe. Couriers, trades and other businesses will have access problems making that junction dangerous.

Farm traffic will be impacted on the local road network as they try to manoeuvre the increase in HGVs and AILs. B1527 is only just wide enough for two commercial vehicles to pass and the road undulates and winds along making the road more dangerous with the extra construction traffic.

11.10 Impact on local Airfields

Site 4 sits within the radius of many busy local airfields within a short distance, including Hardwick Airfield at 3 miles, Tibbenham Airstrip at 5.5 miles, Seething Airfield at 6.5 miles and Old Buckenham Aerodrome (which hosts a large annual air show with the Red Arrows in regular attendance) at 9.5 miles.

There is also a small private airfield on the western boundary of Long Stratton that acts often as a personal, farm-based airstrip used for light aircraft, with occasional helicopter activity.

Site 4 sits under the approach path for Norwich International Airport with numerous large passenger flights seen daily above.

The East Anglia Air Ambulance is regularly seen flying to and from Norfolk and Norwich University Hospital.

The air space above Site 4, and in fact in the skies above the rest of the East Pye Solar proposal, is used on an almost daily basis by the Royal Air Force and the American Air Force for training including jets and very low flying large aircraft. It is commonplace to have 'dog fights' above the villages of Long Stratton and Stratton St Michael and the 'glint' and 'glare' caused by the reflection of the sun on the solar panels, could cause serious safety issues especially in the cumulative impact of the scheme.

Well documented research highlights the vulnerability of aviation to 'glint' and 'glare' as they can cause temporary visual impairment for pilots, with the risks being more acute during low-altitude flights segments such as approach and departure, when pilots must maintain precise visual awareness. This is clearly a major issue in this part of South Norfolk with the amount of small airfields in close proximity.

It is strongly felt that a robust Glint and Glare Assessment is completed covering the following:

-

1. Solar Position Modelling: Annual and diurnal sun paths to determine potential reflection windows.

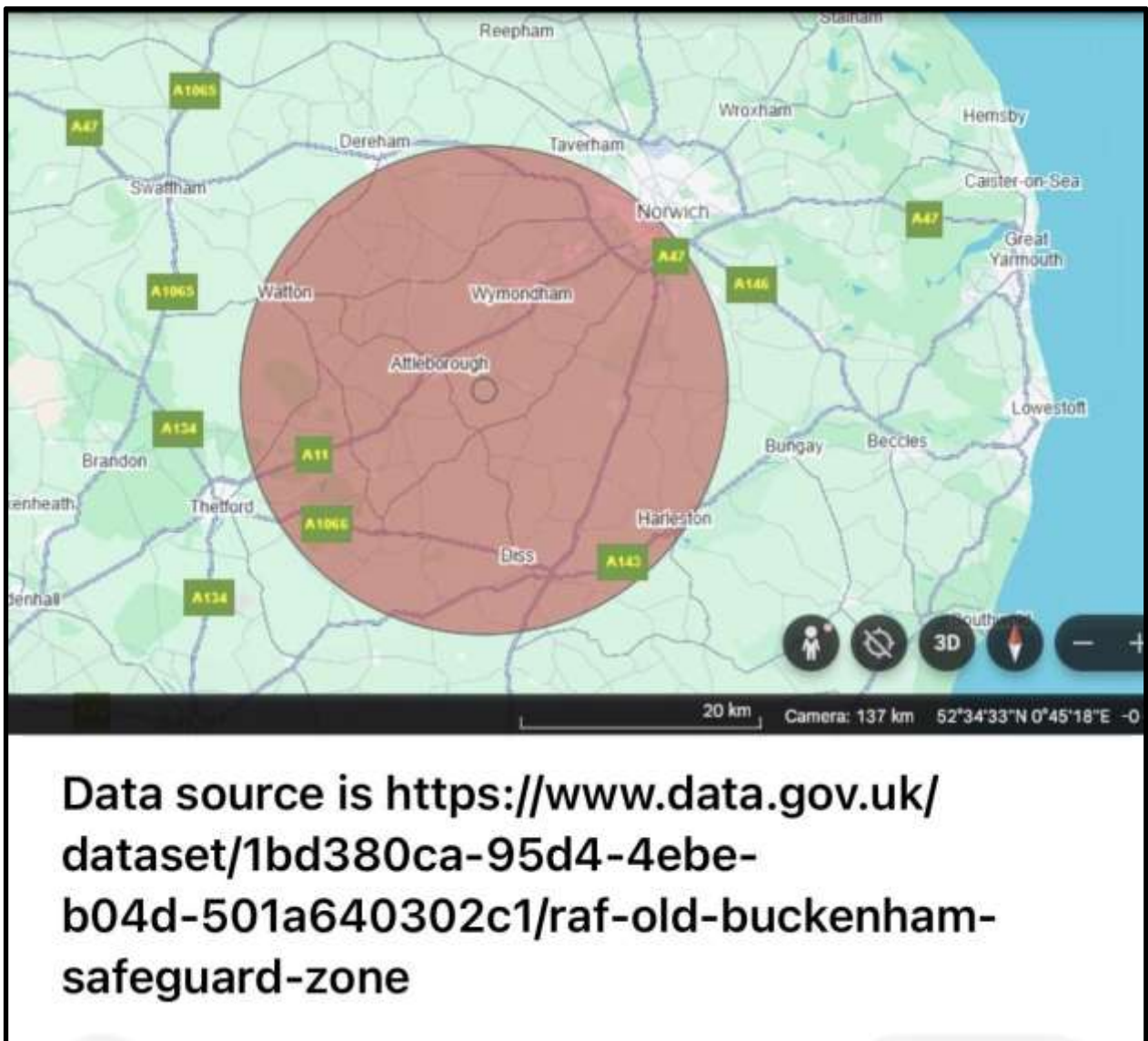
2. Receptor Mapping: Identification of all sensitive aviation receptors.

3. Geometric Visibility Analysis: Determining whether reflected rays intersect pilot sightlines.

4. Intensity Estimation: Assessing whether reflections exceed daylight luminance levels likely to cause discomfort or disability glare.

5. Duration and Timing: Identifying when and how long glint or glare would be experienced during operational periods.

6. Cumulative Impact: Where applicable, assessing multiple solar PV developments in the same airspace.



Chapter 12: Noise and Vibration

Introduction

Site 4 is divided into two sub-sites that straddle the A140 and is 'top and tailed' by the Hempnall roundabout at one end and the Long Stratton by-pass at the other.

However, in the middle of Site 4 and all around the periferias are residential homes, many listed at Grade II* and Grade II as well as the Grade I listed St Michael's Church.

Site 4 is a large site of 250 acres and incorporates not just solar arrays but also has a construction and holding compound on Sub-site 4A as well as a 132kV substation on Sub-site 4B.

The access point (A19) to Sub-site 4A is to the construction compound off of the busy Hempnall roundabout that will also act as a holding site for haulage to Site 7A-7F.

Access to Sub-site 4B is at A20 off the B1527 which is also the LS3 PRoW which will be closed for the duration of the construction time. This access point is potentially another access route to the CRC4 although hasn't formed part of the consultation nor confirmed.

Residents living within and around Site 4 will undoubtedly experience substantial greater noise and vibration impacts than would be expected from installation of solar alone. Significant concerns remain regarding whether the Applicant's assessment adequately identifies all affected receptors and accurately characterises the full extent of the likely impacts.

Long-term exposure to construction noise has significant, well-documented negative impacts on the mental health of nearby residents, acting as a chronic environmental stressor that extends beyond simple annoyance.

Persistent, high-intensity noise from machinery, drilling, and piling triggers the hypothalamic-pituitary-adrenal (HPA) axis, a 'fight or flight' response, leading to increased cortisol (stress hormone) levels. It also causes cognitive overload, fatigue, anxiety, irritability, and a 30% higher risk of depression.

Key mental health impacts of long-term construction noise on residents include:

Chronic Stress and Anxiety:

- Constant noise keeps the body in a state of alertness, leading to elevated cortisol levels, heightened stress, and anxiety.
- keeps the body in a "fight or flight" mode (sympathetic nervous system activation), which leads to persistent mental fatigue, irritation,

Sleep Disturbances:

- Noise above 30–40 dB during sleeping times can disrupt sleep stages;
- Even if you don't fully wake up, your body reacts;
- Construction noise causes micro-awakenings that disrupt deep sleep, leading to insomnia, sleep deprivation, and subsequent fatigue;
- Noise disrupts sleep patterns, preventing necessary rest, which directly leads to increased irritability, reduced cognitive performance, and mood disorders;
- Construction times are from 7am - 6pm Monday to Friday and 8am - 1.30pm on Saturdays;
- Many people work shifts, nights and also from home;
- Young children and babies can be more sensitive to sound and disturbance;
- These effects are typically linked to environments with continuous noise above 55–60 dB.

Irritability and Emotional Fatigue:

Persistent auditory irritation lowers mental resilience, leading to reduced patience, moodiness, and a sense of being overwhelmed.

Impaired Cognitive Function:

- Especially relevant to children;
- Residents and workers may experience reduced concentration, memory problems, and difficulty focusing, particularly when working or studying from home;
- Impaired decision-making capabilities can reduce productivity and increase occupational risks;
- Learned Helplessness;
- Long-term, uncontrollable noise can lead to a sense of hopelessness or powerlessness, as residents feel they cannot control their own environment.

Noise Sensitivity:

Individuals with higher sensitivity are more vulnerable to experiencing significant anxiety, depression, and poor sleep quality due to environmental noise.

Tinnitus

- Ringing, buzzing, or humming in the ears;
- Often linked to repeated exposure to loud environments including, machinery, power tools etc

Hyperacusis

- Increased sensitivity to everyday sounds;
- Can develop after prolonged noise exposure

These happen even at levels below those that damage hearing. They're caused by the body's stress response.

Vulnerable Populations

While noise affects all residents, certain groups are at higher risk of adverse mental health outcomes:

Children:

- More sensitive to noise-related stress;
- can lead to behavioural issues;
- learning disruptions like reduced attention, slower reading development;
- lower memory performance

Elderly:

- More vulnerable to cognitive decline;
- hypertension;
- depression associated with noise.

Low-income Residents:

- Frequently located in areas with poor insulation;
- lower capacity to move or soundproof;
- leading to higher exposure rates.

On-going Mental Health:

- less tolerance;
- have greater negative outcomes

THE HOLLIES, Brick Kiln Lane is a Residential Support Setting that provides accommodation, support to adults with a mental health condition and/or mild learning disabilities. This residence is located in a quiet, single-track lane with limited through traffic. The Hollies is a Grade II listed building. Residents are sensitive to disturbance, change and disruption.

Mechanisms and Long-Term Outcomes:

Chronic noise exposure acts as a "direct pathway" of harm to the brain, causing neuroinflammation and oxidative stress, which are linked to neuropsychiatric outcomes. The inability to recover from this daily noise leads to:

Increased Depression Risk:

- Residents in high-noise areas are more likely to report higher psychological distress and depression.

Reduced Quality of Life:

- The continuous nature of construction noise causes emotional fatigue, significantly reducing overall well-being.

Physical-Mental Interplay:

- The stress and sleep deprivation can cause cardiovascular issues, such as hypertension and headaches, which in turn exacerbate mental stress.

www.decibelinternational.co.uk

Work from Home or Retired:

- Owner at The Dairy works from home;
- multiple homes surrounding the plots across the scheme are retired and enjoy the countryside to walk and hobbies;
- Many elderly are less able to escape their home and continuous construction noise.

Even moderate noise can feel excessive if it's continuous or unexpected and irregular.

It is accepted that noise becomes excessive if the noise level is 55-60 dB within your home environment during the daytime and 40-45 dB within your home environment during the night.

There are a number of residential properties within less than 100 metres of Site 4A and 4B, who will undoubtedly suffer a noise nuisance and a potential risk to physical and mental health, as a direct result of the construction work

12.1 Impact to residents caused by noise and vibration

Accuracy of identification of affected Sensitive Receptor

The Applicant in the Environmental Statement Vol 1 Chapter 12, has stated that they have assessed the impacts on Sensitive receptors at the different Site locations based on the following distance of that receptor from the works:

Assessment	Distance
Construction noise	300m (505m for overnight works)
Construction vibration	100m
Construction traffic noise	50m from the centre of the highway
Operational noise	500m from the Order Limits

Decommissioning noise	300m
Decommissioning noise	50m from the centre of the highway

Figure 12.1 Table of the Applicants' distant criteria for phases of the project

For Site 4 the Applicant has identified a series of Nearest Sensitive Receptors (NSR) and based the assessment upon those receptors.

However, a review of the submitted plans indicates that several residential properties are located nearer to the proposed works nor have the properties that have been considered been assessed from the curtilage of the property to the edge of the Site. For example, The Cedars and the properties within the curtilage of The Cedars on Norwich Road are sandwiched between Sub-site 4A and 4B. The front of the curtilage is within less than 50m of the edge of Sub-Site 4A and the rear of the curtilage is less than 100m of Sub-Site 4B.

It also should be pointed out that the Measuring Point (MP) for the Norwich Road was taken on the A140, which is a busy haul road. If taken within the curtilage as well as at the rear boundary with Sub-site 4B, ambient baseline sound would be reduced. The same is to be said for the MP on Brick Kiln Lane which is near the junction with B1527 rather than further along the quiet lane towards Holly Cottage which is ~150m from the Order Limits or The Hollies which is a mental health residential home.

As the noise survey was carried out between October 2024 and February 2025, the Long Stratton by-pass would have been in full construction which in turn would have affected the ambient noise surrounding Site 4 from not just construction noise but also additional road noise along B1527 and surrounding lanes, like Brick Kiln Lane which were diversion routes whilst previous lanes were closed.

It is also important to point out that the majority of homes within the boundary of Sub-site 4A and 4B are listed Grade I, Grade II* and Grade II.

As a consequence, the assessment underestimates both the extent and significance of the likely noise and vibration impacts.

No noise receptors were placed for the CRC where properties and businesses will be significantly impacted by noise including Goodies Food Hall and the Pulham Patch.

Omitted Sensitive Receptors

The following properties appear to satisfy the Applicants own assessment criteria but have not been included within the assessment:

- Brick Kiln Cottage
- Colorcote
- Hollies Bungalow
- Holly COttage
- Appletree Cottage
- Grey Gables
- Hollies Farm Barns
- The Hollies Residential Home
- Church Farm
- The Old Rectory
- The Old Rectory Barns
- Thatched Cottage
- 1 Church Lane
- 2 Church Lane
- Well Meadow Cottage
- The Cedars Bungalow
- Tumbrel Barn
- The Dairy Barn
- Michaelmas Barn
- Red House

The distances quoted in this representation are based upon the actual residential curtilage and property boundaries rather than desktop measurements to dwellings centrelines.

All resident properties included and omitted are of High Sensitivity Impact.

When the Applicant's receptor schedule is compared with its own location plans and mapping of residential properties within 500m of the Order Limits, it becomes apparent that the number of potential affected receptors has been materially understated.

The consequence is that the assessment may underestimate the scale of noise and vibration effects experienced by nearby residents, businesses and users of Public Right of Way.

Furthermore, contribution activities are predicted to generate sound power levels approaching 120 dB(A). In those circumstances, limiting the construction assessment to receptors within 300m may not fully capture the extent of potential impacts, particularly when cumulative effects from neighbouring construction areas and cable corridors are taken into account. The assessment on noise and vibration to sensitive receptors is flawed due to the omission of numerous residential properties.

In addition to the omission of multiple properties, or grouping some properties together or one lane together, there is no measurement for Long Stratton PRoW 3 and 4 which are within the Order Limits of Sub-Site 4B. Although LS3 will be closed during construction, it will be directly

impacted by the 132kV substation that the PRow will run alongside during operation. Whereas ProW4 won't be closed and will be severely impacted.

Cable Route Corridor

It should be pointed out at this point that no noise impact has been considered for any of the Cabling Route Corridors and the Applicant considered that the receptors incorporated within the Documents incorporated the impact of the Cabling Route as well.

Cable Route Corridor 4 is 8km long and should really be considered as an additional Site in itself as it stretches from the tip of Sub-site 5A and Sub-site 4B to Site 2C at the start of the southern cluster.

CRC 4 includes:

- three construction compounds;
- a two-way haul road, serving 11 HGVs daily in each direction;
- trenching;
- HDD;
- AIL delivery
- HGV delivery

The Applicant's own documentation only included three properties that could be affected by the construction of CRC4 however the list of properties is considerably longer and almost all fall within the Applicant's own 300m of construction assessment and if looking at CRC4 as a Site due to its size, all fall within the 500m guidance.

For CRC4, the documents state the nearest properties are Wood Lane (160m), Parker's Lane (390m) and Mill Road (240m)

When the reality is:

- Reeves Cottage ~55m
- 1 Mill Cottage ~55m (west and south)
- 2 Mill Cottage ~55m (west and south)
- Wood Green Farm North <100m (west and north)
- Cowslip Barn 1 < 100m
- Cowslip Barn 2 < 100m
- Maple Tree Barn <100m
- The Chalet <100m
- Wood Green Farm South <100m
- Happy Meadow <100m
- Mayfield Farm Barns ~100m (west and north)
- Mayfield Farm Cottage ~100m (west and north)
- Mayfield Annex ~100m (west and north)

- Mayfield Farm ~100m (west and north)
- The Mill House <100m (east and south)
- The Mill <100m (east and south)
- Greenwood Cottage ~160m (east and north)
- 4 New Cottages ~ 400m
- Three Ways ~c350m
- The Hollies ~100 (east and west)
- Crowgreen Farm House ~150m
- Wood Farm Barn ~160m (east and west)
- Wood Farm House ~160 (east and west)
- Oak View ~300m
- Goodies Farm Shop and Restaurant ~150m
- Parish Farm ~150m
- Walnut Farm ~150m
- Stable Cottage ~150m
- The Cottage ~150m
- Frenchs Farm ~150m
- Athena Pilates ~350m
- The Oaks ~350m
- The Pulham Patch - CRC4 will go straight through the business making it unable to operate for the duration of construction;
- Ashleigh Farm ~200m
- Crossways House ~200m

All these properties will have a direct view of CRC4, the haul road and multiple properties and businesses will experience delay, noise, vibration, dirt and **detrimental business impact or potential demise** from the CRC4.

It is also worth noting that all these properties listed for the CRC4 will also be impacted for construction of the solar sites through noise, increased haulage, road closures, delay etc including site 4 and site 2C.

Two businesses that will be forced to endure severe impact if East Pye Solar is consented aren't even listed within the documents yet are some of the nearest, if surveys were done.

**Goodies Farm Shop and Restaurant, Wood Lane, IP21 4XU has been significantly impacted by the construction of the Long Stratton bypass with road closures and traffic delays causing a reduction in customers whilst the area became challenging to access.*

I have permission to include Goodies Written Representation as part of my document

Stuart
Director of Goodies Farm Shop and resident at French's Farm
Gooderham
French's Farm, Wood Lane, Pulham Market, South Norfolk, IP21 4XU

I object to the proposed construction compound and cable works near my home at French's Farm and Goodies Farm Shop because of their potential impact on our living conditions, business and access.

Impact on my home

I have been advised that a construction compound of approximately 13 acres could be situated immediately outside my home for around two years. I am concerned about prolonged noise, dust, lighting and heavy vehicle movements affecting my home and garden.

Please confirm the compound's exact location, size, duration and working hours, explain why this location was selected, and demonstrate that alternatives further from occupied homes have been considered.

Impact on Goodies Farm Shop and staff

Goodies is heavily dependent on passing trade from the A140. During disruption associated with construction of the Long Stratton bypass and the works at Swainsthorpe, **we recorded sales declines of over 25%, placing enormous financial pressure on the company.** The 2025 Swainsthorpe disruption was associated with electricity cabling works on the A140 for EDF's Bloy's Grove solar project.

Further congestion, closures or diversions could deter customers, reduce passing trade, delay deliveries and disrupt staff travelling to and from work. Keeping our entrance open would not, by itself, protect the business from these effects.

Please assess these impacts specifically for Goodies, including the combined effects of compound traffic, cable installation beneath the A140 and any other planned roadworks, closures or diversions in the surrounding area. This should cover customer journeys, staff commuting and delivery routes. We can provide supporting sales information.

Information and safeguards required

I request:

- Details of the A140 crossing method, programme, traffic restrictions and arrangements if works overrun.
- Construction traffic routes, expected vehicle numbers and measures to protect customer, staff and delivery access.
- Coordination with Norfolk County Council and other works promoters to avoid overlapping road disruption and minimise the combined impact on trade and access.
- Enforceable controls on working hours, noise, dust and lighting.
- Advance notice of disruption, clear access signage and a named contact to resolve problems promptly.

Our June 2026 Preliminary Ecological Appraisal also records nesting birds and identifies the need to control lighting near trees potentially used by bats. Please confirm that any relevant effects of East Pye's nearby works have been assessed.

I ask that these concerns are addressed before consent is granted and that alternative compound locations and measures to minimise road disruption are fully examined.

Stuart

Director, Goodies Farm Shop and resident at French's Farm

Gooderham

**Pulham Patch, Wood Lane IP21 4XU was created in 2023 to diversify some farm land from a fifth generation family farm that has been farming this land since the 1920's. The Pulham Patch opened the Pumpkin Patch in October 2023 and following the success of that has created an Easter Trail with PYO Daffodils, the Maize Maze and PYO Wildflowers/Sunflowers with rid-on tractors, bale mountains, play area and Craft Ark in the summer. A local, inexpensive family attraction that educates children about the land and allows families to enjoy time together.*

The CRC4 will go straight through this business destroying everything that has been created since it was started, including local employment, whilst removing external outlets that provide additional services like refreshments. This cannot be mitigated against.



The Red represents the Cable Route Corridor 4 that will dissect the Pulham Patch land that abounds Tyrell's Wood and comes within tens of metres of Goodies Food Hall



In addition to the impact on properties, as no surveys have been carried out on the CRC, the impact to PRow and Bridleways will equally be significant.

There are approximately 16 PRow within the CRC4 alone and these are used not just by people walking for recreation but also by local residents, including school children, accessing the facilities of Long Stratton and the local transport routes to Norwich for work, college and recreation, or south to Harleston and Diss.

These PRow will be adjacent to the HGV haul road, trenching, HDD and Construction compounds.

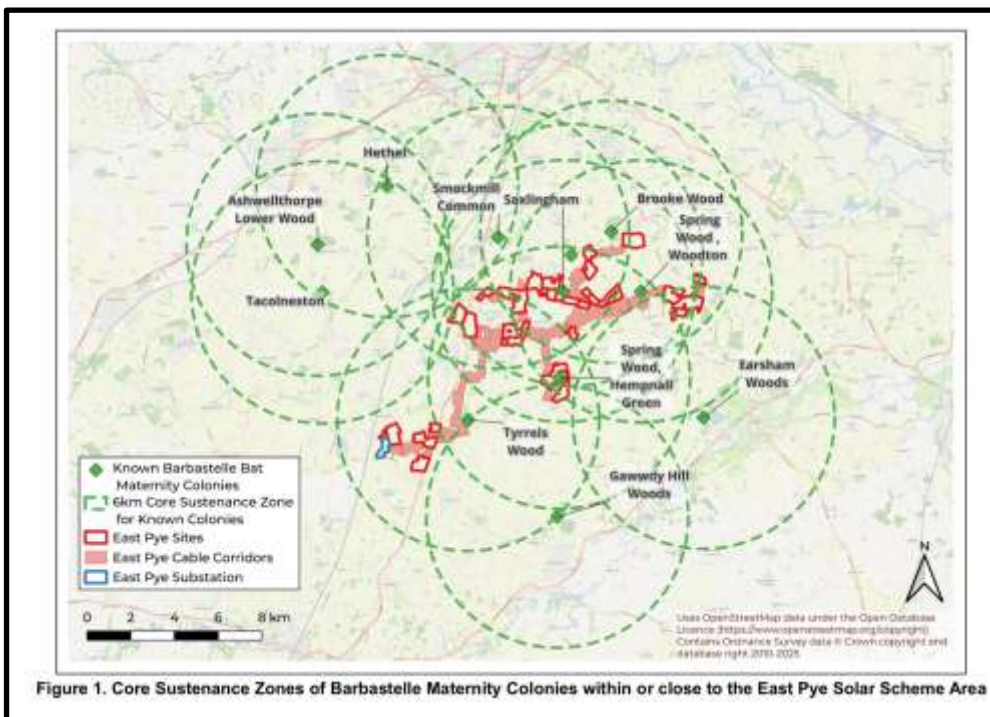
As part of the requirement for submitting plans was to include the Cabling Route in detail. This clearly has not been the case and by simply stating the CRC is included within the Site noise receptors is unacceptable.

The extent of impact of CRC4 to multiple properties requires noise and vibration evaluation. By excluding the cabling routes, especially cable route corridor 4 from the noise surveys, makes the surveys flawed and incomplete.

THE EFFECTS OF NOISE AND VIBRATION ON WILDLIFE:

BATS

With the whole of the East Pye Solar scheme within the feeding zones of the protected Barbastelle Bat maternity colonies noise and vibration will be detrimental to these colonies and can not be mitigated against.



Noise and vibration severely disrupt bats by masking their echo-location, causing avoidance behaviour, and disrupting foraging, leading to reduced hunting efficiency and potential roost abandonment. Intense sounds, such as traffic and industrial noise, can force bats to abandon prime feeding areas and disturb hibernation.

Key Effects of Noise and Vibration on Bats:

- **Foraging Impairment:** Noise masks the faint rustling sounds of prey, making it difficult for bats to locate food. Studies found that during noisy conditions, foraging time decreased, while search time and energy consumption for hunting increased. batability.co.uk
- **Avoidance Behaviour:** Traffic noise and industrial activity can act as a deterrent, causing bats to avoid commuting routes or foraging areas within 10–50 meters of the source. Nottinghamshire County Council

- **Disruption of Echolocation:** While not always "jamming" the signal, high-intensity sound interferes with a bat's ability to navigate and locate prey, essentially creating an uncomfortable or unusable "noisy" airspace. batability.co.uk
- **Roost Disturbance:** Vibrations and noise, such as from machinery, construction, or large public events, can cause bats to abandon their roosts, particularly impacting them during hibernation (torpor). Bat Conservation Trust
- **Physical and Physiological Stress:** While some species show resilience in laboratory settings, high-intensity sound can increase stress and, in some cases, cause physical distress due to their extremely sensitive hearing. Bat Conservation International

Usage Examples / Contexts

- **Infrastructure Impact:** Studies on the autobahn (Germany) found that noise reduces habitat connectivity and restricts foraging.
- **Renewable Energy:** Wind turbine noise and vibration necessitate shutdowns during migration periods to prevent fatal impacts on bats.
- **Urban/Construction Activity:** Concerts, music festivals, and construction projects near woodland edges can force bats out of their roosts. Bat Conservation Trust

Synonyms and Related Concepts

- **Acoustic interference:** The primary effect of noise on sonar.
- **Sensory pollution:** The broader category including noise, light, and vibration.
- **Habitat abandonment/loss:** The result of noise rendering a home uninhabitable.
- **Masking effect:** When ambient noise drowns out the sounds a bat needs to hear.

MAMMALS: Deer, Hares, foxes, badgers

Noise and vibration, particularly from anthropogenic sources, have significant, mostly negative impacts on deer and other mammals, ranging from behavioural changes and habitat avoidance to physiological stress.

As the whole of East Pye Solar scheme is the home to many species of deer including native Red and Roe, that free roam often in majestic herds or as individuals.



Edges Lane, CRC4

Hares are often seen on fields across the scheme and especially in large numbers during the breeding season.

Key effects include:

Habitat Loss and Avoidance: Constant noise, such as that from drilling or machinery, causes mammals to abandon areas or reduce their use of habitat within 200 meters of the source.

Behavioural Disruptions: While mammals often habituate to repetitive sounds, sudden, intense noises can trigger immediate flight responses. They may temporarily flee, check the source, and then resume activity, or in some cases, exhibit increased wariness.

Physiological Stress: Noise pollution can increase anxiety, lead to higher heart rates, and cause chronic stress.

Reduced Effectiveness of Anti-Collision Devices: High-frequency sound devices (like car horns) are largely ineffective at preventing deer-vehicle collisions especially when additional sounds are driving deer and mammals towards roads where they would have avoided.

Movement Limitations: while noise impacts where mammals spend their time, it does not necessarily change the size of their overall home range just changes it displacing mammals or causing crowded zones.

Key Findings on Noise Tolerance:

- Deer often tolerate noise levels up to 70 dB(C) before significantly reducing their use of a habitat area.
- Sudden or unpredictable noise is more likely to cause a significant reaction than constant, predictable noise.

WHITE CLAWED CRAYFISH

Noise and vibration from anthropogenic activities (such as boat traffic, construction, and water pumping) have significant negative impacts on the behaviour and physiology of white-clawed crayfish (*Austropotamobius pallipes*). As crustaceans, they detect these sounds primarily through particle motion—vibrations in the water or substrate—using sensory hairs, which can lead to chronic stress, increased vulnerability to predation, and disrupted foraging behavior.

Key Effects of Noise and Vibration:

- **Behavioural Disruption & Stress:** Exposure to increased underwater noise can result in behavioural changes similar to those seen in other crustaceans, such as reduced feeding activity and increased resting levels outside of protective refuges. This increased exposure makes them more susceptible to predation.
- **Reduced Foraging and Increased Aggression:** High noise levels can cause increased aggression (number of fights) among individuals and alter activity levels.
- **Physiological Stress:** Noise can lead to a "startle" response, which increases oxygen consumption (metabolic rate). Chronic exposure to noise can impair their ability to cope with environmental changes.
- **Physical Damage to Sensory Organs:** Studies on aquatic invertebrates suggest that loud, low-frequency noises can damage their statocysts—organs responsible for balance and orientation. University of Exeter News
- **Interference with Habitat Use:** Anthropogenic vibration, such as from construction on or near riverbanks, can destroy or render uninhabitable the bankside tunnels and refuges that white-clawed crayfish rely on for survival. Gilling West Fly Fishers

Sensitivity Mechanisms:

- **Sensory Hairs and Statocysts:** Crayfish detect vibrations through an extensive array of sensory hairs and internal statocysts (mechanoreceptors);
- **Low-Frequency Sensitivity:** White-clawed crayfish are most sensitive to low-frequency vibrations, typically below 150 Hz, which correspond to the vibrations produced by many biotic and anthropogenic events (e.g., machinery);
- **Substrate-Borne Sensitivity:** They are highly responsive to vibrations transmitted through the riverbed or bank. Discovery of Sound in the Sea.

While white-clawed crayfish are physiologically resilient to some noise due to lacking air-filled cavities, their reliance on a quiet habitat for foraging and avoiding predators means noise pollution poses a threat to their survival.

BEES AND POLLINATORS

Although research is limited there are some conclusions that can be drawn from scientific literature.

Noise During Construction

Potential sources including:

- Piling;
- Earthworks;
- Heavy machinery;
- Vehicle movements;
- Compaction equipment;
- Temporary generators.

Potential effects on bees and other pollinators include:

1. Behaviour disturbance

- Bees detect vibrations through their legs and bodies;
- Strong ground-borne vibrations may temporarily disrupt foraging, communication, or nesting behavior, particularly for ground-nesting solitary bees;

2. Masking of communication

- Bumblebees use vibrations (buzzing) during pollination and within nests;
- High levels of continuous construction noise may interfere with these signals over short distances.

3. Reduced foraging efficiency

- Experimental studies have shown that anthropogenic noise can reduce flower visitation rates in some bee species;
- Bees may avoid noisy areas while construction is underway.

4. Nest Disturbance

- Ground-nesting bees may abandon nests if construction occurs very close to nesting sites;
- Soil excavation presents a greater risk than airborne noise itself.

5. Indirect habitat effects

- Temporary removal of flowering vegetation often has a larger ecological impact than construction noise.

Vibration

Bees are highly sensitive to vibration and Use vibration for:

- Communication
- detecting predators
- buzz pollination
- orientation within nests

Potential construction effects:

- Piling creates strong vibration;
- vibratory rollers may disturb nearby nests;
- repeated vibration could reduce nesting success immediately adjacent to works.

The main factors affecting bees are typically:

1. Habitat loss
2. Floral resource availability
3. Nesting habitat
4. Pesticide use
5. Long-term vegetation management

Although construction effects are generally temporary, localised and reversible provided sensitive habitats are protected, East Pye Solar has failed to survey roadside verges and field vegetation across the sites and have not included bees within their surveys.

Designated Roadside Nature Reserves although marked are also forming parts of access points in many cases or where roads are due to be widened to fit HGVs and AILs.

No surveys have been undertaken on any roadside verges across the scheme and many are home to many rare plants that rely on bees and other pollinators to support the continued survival of such plants. The cumulative effect of this scheme, over the two years of construction across the area, on pollinators, flora and fauna, could be significant.

BIRDS AND NESTING BIRDS

Noise and vibration from human activity (anthropogenic) act as chronic stressors that disrupt bird communication, reduce nesting success, and cause long-term physiological damage, often leading to reduced population density in affected areas.

Noise pollution masks crucial acoustic signals, while vibrations can cause anxiety and physical disruption to nesting behaviour.

Effects on Birds (General Behaviour and Physiology)

- **Acoustic Masking:** Low-frequency noise (from traffic, machinery, or industry) masks bird calls used for mating, territory defense, and warning of danger;
- **Reduced Reproductive Success:** Noise inhibits pairing rates, with one study finding birds in loud areas had a 77% pairing success rate compared to 92% in quiet areas. www.soundplanning.co.uk
- **Behavioural Changes:** Birds spend more time vigilant and less time foraging, which can lead to starvation or reduced fitness;
- **Communication Adaptations:** Many birds adapt by singing louder, changing the pitch of their songs, or changing the time of day they sing. National Institutes of Health (.gov)

Effects on Nesting Birds and Chicks

- **Reduced Reproductive Output:** Noise reduces overall nest success, particularly for forest-nesting birds whose calls are masked by low-frequency noise;
- **Poor Chick Growth:** Chicks in noisy environments are often smaller with slower growth rates and poorer feather development (fault bars) due to reduced feeding and high stress;
- **Impact on Nesting Site Selection:** Birds may avoid noisy areas entirely, leading to lower nesting density in loud habitats;
- **Disrupted Parental Care:** Constant noise can interfere with parent-chick communication, preventing parents from hearing begging calls;
- **Hatching Failure:** Early-life noise exposure can reduce hatching success, especially for larger eggs. NestWatch
- **Nest abandonment:** increase disturbance will lead to nests being abandoned.

Effects of Vibration

- **Anxiety and Stress:** Vibrations from construction or machinery can cause birds to shake, feel threatened, or experience anxiety;
- **Feather Damage:** Chronic vibration-induced stress can lead to "fault bars" (lines of weakness) in developing feathers, impacting plumage quality and flight efficiency. National Institutes of Health (.gov)

Species-Specific Responses

- **Sensitive Species:** Species like the Common Linnet, House Sparrow, and European Greenfinch show significantly decreased densities in high-noise areas;



Greenfinches thriving in the quietness of a garden within 100m of CRC4 and across the Cable Route

Mitigation

- **Reducing Noise:** Using electric-powered tools and cars, constructing noise barriers (vegetation buffers), and conducting construction outside of breeding seasons

Ground-nesting birds are particularly vulnerable because they can't escape ground-level disturbances by moving higher into the canopy. Noise and vibration impact them in several specific ways:

- **Nest Abandonment:** Heavy vibrations from construction or machinery are often perceived as an approaching predator or a physical threat (like a trampling animal), leading parents to flush and potentially abandon the eggs;
- **Acoustic Masking of Predators:** Since ground-nesters rely heavily on hearing the rustle of grass or leaves to detect ground predators (like rats, foxes or snakes), loud noise makes them "blind" to approaching danger;
- **Reduced Foraging Efficiency:** Parents spend significantly more time in "high-alert" scanning mode rather than searching for insects to feed their chicks, leading to malnutrition in the brood;
- **Communication Breakdown:** Chicks of ground-nesting species often use low-frequency "cheeps" to stay in contact with parents while moving through tall grass. Industrial noise easily drowns these out, leading to lost or separated chicks.
- **Physical Egg Damage:** While rare, extreme and constant seismic vibrations (like those from heavy pile driving or mining) can theoretically interfere with the delicate gas exchange through the eggshell or cause micro-cracks.

As the whole of the proposed East Pye Solar Scheme is a skylark protection zone and most of it is within the Lapwing zone, disturbance and cannot be mitigated against.

Skylarks can be seen and heard on all fields across the scheme including the cabling routes.

Impact of Vibration on Timber-framed and Clay-lump buildings

Site 4 is surrounded on all sides by listed and vulnerable buildings within meters of the construction including the Grade 1 Listed St Michael's Church.

The risk from vibration and ground movement is high and can't be migrated against.

Vibrations, whether from construction (piling, blasting), heavy traffic, or machinery, can have distinct impacts on timber-framed and clay lump (cob) buildings due to their specific structural characteristics. Generally, these materials are more flexible than masonry, which can allow them to absorb some energy but also makes them susceptible to damage at connections and joints.



Tumbrel Barn during conversion showing the clay lump construction.



As part of the conversion of Tumbrel Barn and Dairy Barn it was insisted both buildings kept the original wooden frame and clay lump making them historic fragile structures

Impact on Timber-Framed Buildings

- **Connection Failure:** The primary risk is at the joints. Persistent vibration can cause damage to connectors, steel brackets, and fasteners, particularly in mass-timber or glulam structures.
- **Cracking in Finishes:** While the timber frame itself may be robust, rigid interior finishes like plasterboard or exterior cladding (brickwork, stucco) are prone to cracking due to movement.
- **Floor Vibrations:** Modern timber-framed buildings may experience, or cause, excessive floor vibrations (e.g., from walking), which can be a serviceability issue.

Impact on Clay Lump (Cob) Buildings

- **Vulnerability to Moisture and Settlement:** Clay lump is a rigid but relatively weak material compared to masonry. Vibrations can cause differential settlement of the bearing soils, which in turn leads to cracking in the walls.
- **Brittleness and Cracking:** Clay lump buildings are often older, heritage structures. The rigidity of the clay makes it susceptible to cracks from vibrations, particularly at the corners of openings (doors and windows).

- **Weakened Structure:** Persistent vibrations can exacerbate existing defects, such as loosening the bond between the clay and any added strengthening materials or exacerbating issues in rubble-filled walls

General Observations

- **Damage Patterns:** The first signs of vibration-related damage usually appear on interior, non-structural, or rigid finishes, such as plaster or tile.
- **Source of Vibration:** Construction activities like pile driving and heavy drilling are more dangerous than passing traffic.
- **Mitigation:** To minimise damage, it is crucial to monitor peak particle velocity (PPV) and frequency, particularly in areas with sensitive historic structures.

Impact of Vibration on other Vulnerable Structures

Listed buildings account for 2% of the building stock in England and of those listed buildings, only 2.5% are Grade I listed.....Very little information is published on the effects of vibration on listed buildings. However the penalties for damaging a listed building are severe, constituting a criminal offense in some cases.

<https://learninglegacy.crossrail.co.uk/document/vibration-management-and-listed-buildings/#:~:text=Where%20the%20ceilings%20were%20visible,of%20the%20timber%20lath%20support.>

During Construction

East Pye Solar say:

- The Scheme currently has a National Grid connection date of 2031. The construction of the Scheme is proposed to be undertaken over an estimated 24-month period. Subject to the DCO consenting process, the earliest construction start date would likely be 2028.
- The construction period will vary across the Site. For the larger sub-Sites there will be opportunities for having multiple construction crews working at the same time.
- There will be temporary construction compounds including that on site 4A and the grid connection works (installation of the cable route). The temporary construction compounds will comprise:
 - Temporary portacabins for construction operatives (the dimension of the portacabins would vary and the maximum size for individual units is expected to be 10m by 3m with a typical maximum height of 3m);
 - Perimeter security fencing with a typical maximum height of 3m;
 - Parking areas for construction and workers vehicles;
 - A secure compound for storage;

- Temporary hardstanding;
- **Wheel washing facilities (if appropriate water connection and drainage facilities can be provided). This will cause a greater risk to the river Tas and *white clawed cray fish***
- Storage bins for recyclables and other waste; and
- Temporary lighting for use during construction periods that fall within hours of darkness and within the agreed hours, with the exception of specified circumstances (as set out below).

Construction activities are likely to be carried out Monday to Friday 07:00-18:00 when crews are on site, and between 08:00 and 13:30 on Saturdays. However, some activities may be required outside of these times (such as the delivery of abnormal loads, concrete pours for foundations, night-time working for cable construction works in public highways or horizontal direction drilling activities).

Where possible, construction deliveries will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00).

The construction phase of Site 4A and 4B is likely to take at least 12-18 months.

Environmental reports produced for Springfield Solar Farm, The Drovers Solar Farm and East Stour Solar Farm identified the Construction phase as having the biggest noise impact.

Site Preparation (1–3 months)

- Access roads;
- Earth moving machinery;
- Fencing;
- Drainage and erosion control;
- Delivery vehicles

Racking & Pile Installation (3–6 months)

- Thousands of steel piles driven into the ground;
- Mounting structures assembled

Panel Installation (3–6 months)

- Hundreds of thousands of panels installed;
- Cable trenching

Construction of Sub-Station (3-6 months)

- Earth moving machinery;
- Delivery vehicles;
- Concrete mixers;
- Vibratory rollers;
- Drilling and pilling for foundations;
- Noise from cranes moving steel frames;
- Heavy vehicle movements

Electrical Work (4–8 months)

- Inverters and transformers installed;
- DC cabling and AC collection system;
- Grid interconnection

Commissioning & Testing (1–2 months)

- System checks;
- Grid synchronisation;
- Performance testing

The following are examples of decibel levels of some of the machinery used during the construction period: -

- Excavator 70-80 dB –comparable to a busy road;
- Concrete breaker 90-100dB – comparable to a jackhammer;
- Pilling 100+ dB – comparable to very loud industrial noise;
- General construction – 65-85 dB – busy road

It is accepted that at: -

- 50 metres construction is clearly audible and can be intrusive;
- 100 metres construction noise can be noticeable but less sharp than at 50 metres;
- 200 metres construction noise is still noticeable, but can blend into surrounding noise

Sound drops by roughly 6 dB every time you double the distance, so to put into context a typical excavator is 80 dB at source: -

- 74 dB at 10m;
- 68 dB at 20m;
- 62 dB at 40m (noise of washing machine at mid-cycle);
- 56 dB at 80m (car passing at 30-40 metre distance away);
- 50 dB at 160m (the noise of a domestic dishwasher)

However, sound in the countryside travels further and is more noticeable than in urban surroundings where the 'noise floor' is greater.

If background noise is more significant or cumulative noise is all around, then construction or abnormal noise is less noticeable and more blending.

But in a rural environment which is quieter and with less obstacles for noise to bounce off, it will allow noise to appear louder, more noticeable and sound will travel further. The sound of a dog barking or a tractor in a field is heard from a mile away.

Cumulative noise from multiple sites in particular piling which will be repetitive could have significant impact on residents and people working in the area.

During Operation

The operational phase will result in noise, but to a lower level.

Solar Panels

- The proposal is that Site 4 will have rotating/tracking Solar Panels;
- up to 4.5 metres in height;
- Noise emits from electric motors and gears installed in the panel which drives the movement of the panels;
- The noises are not continuous;
- They occur every 10-15 minutes in order to adjust the panel's position by 1-2 degrees;
- The noise emitted is a mechanical whirring, a hum from the motor and clicks from gear engagement.

At close range, 1–2 metres, the noise level is typically 40-55 dB and at 20-30 metres distance it is typically 35-40 dB, which as identified previously can disturb sleep at night to properties at close proximity like those on Church Lane (The Old Rectory, The Rectory Barn, Thatched Cottage) as well as those in the curtilage of The Cedars including The Dairy, Tumbrel Barn and The Stables.

Inverters

Solar farm inverters make a steady, low frequency hum and sometimes a light buzz or fan noise, typically:

- 45–65 dB up close – 1 metre;
- 35–45 dB at short distance – 10 metres;
- 30–35 dB at property boundaries – 50-100 metres

Typical inverter noises: -

- Low frequency hum (transformer type sound);
- Light buzzing from electrical components;
- Cooling fan noise (only on some models);
- Occasional clicking when relays switch on/off

These are continuous during daylight hours, because inverters operate whenever the panels are producing power.

132 kW Substation

A Solar farm Substation makes a steady, low frequency hum and sometimes a light buzz or fan noise, typically:

- 50–65 dB up close – 1 metre;
- 40-50 dB at short distance – 10 metres
- 30–35 dB at property boundaries – 100 metres

Transformers operate permanently, unlike inverters which shut down at night.

During Decommissioning

The noise of decommissioning the sites will be very similar to that during construction and will resemble a building site with similar traffic.

Conclusion

The sound of construction, operation and decommission will change the nature of the area from countryside to building site and industrial park.

Rather than a sense of peace and mindfulness, which is often why people use or move to the countryside, it will create a sense of not belonging, confusion, frustration and anger.

The beloved sound of skylarks and songbirds will be replaced by that of industrial humming and buzzing.

Some of the PRow will run alongside and within metres of Substations, Inverters and Transformers for example Long Stratton FP3 and FP4 on Sun-site 4B. The view as well as the noise will change this footpath experience from one of a mindful openness to noise and enclosure.

People living on the boundary of Sub-site 4A and 4B will experience a cumulative noise impact, not just during the construction but also during operation, replacement, maintenance and decommissioning of the Scheme which will change how people live and experience their homes and gardens.

Cleve Hill Energy Park NSIP in Kent and residents in Swainesthorpe regarding the new BESS on the A140, all complain of noise and a continuous humming that is disturbing and debilliting.

This cannot be mitigated against.

Chapter 13: Air Quality

East Pye Solar Project introduces localised air quality challenges during construction and, in some cases, could alter local microclimates through land surface changes.

Construction and Infrastructure Impacts

The construction of site 4A and 4B of the East Pye Solar scheme would require:

- Delivery of panels, frames, piles, transformers, cabling;
- Machinery including for excavation, cranes and telehandlers;
- Delivery of concrete for substations and compound;
- Multiple HGV's and AIL journeys per day;
- Congestion to local roads due additional construction traffic;
- Congestion due to road closures and changes to road layouts

The installation phase of solar infrastructure (panels, mounting, inverters, cables) produces air quality issues and can't be mitigated against.

- **Dust Generation (PM10 and PM2.5):** Earthworks, site clearing, and heavy machinery movement on unsealed roads create dust, particularly in dry and windy conditions;
- **Combustion Emissions:** Increased traffic from heavy-duty vehicles (HDVs) delivering materials, as well as on-site construction machinery, increases emissions of nitrogen oxides (NO) and carbon monoxide (CO).
- **Localised Impacts:** While these impacts are temporary, they must be managed to prevent localised air quality deterioration, especially near sensitive receptors. [nsip-documents.planninginspectorate.gov.uk](https://documents.planninginspectorate.gov.uk)

On narrow lanes like B1527, Brick Kiln Lane and Church Lane the emissions will linger, increasing exposure for residents, walkers and cyclists.

Duration and Intensity

Given the scale of the scheme and the reliance on the A140, construction would last 24 months across the scheme:

- No recovery period for vegetation;
- Repeated disturbance from overlapping phases;
- Persistent emissions and dust generations;
- Increased traffic disruption to local people so longer periods of commuting time with higher emissions and/or moving commuter routes to small lanes increasing emissions beyond the scheme.

Surface and Microclimate Changes

Large-scale solar farms can alter the surface characteristics of land, which affects local climate and, indirectly, air quality.

- **Albedo Modification:** Solar panels are generally darker than the land they replace (e.g., in arid regions), which reduces surface reflectivity (albedo) and can lead to a cooling effect during the day. Most significant during longer spells of dry weather in summer months when the soil dries, lightens and cracks;
- **Local Cooling/Heating:** While some studies show solar farms can create a "cooling effect" (reducing land surface temperature, particularly during the day), others have noted a potential "heat island" effect, where surface temperatures increase;
- **Vegetation Loss:** Large-scale land clearing for solar farms can remove vegetation, potentially increasing local dust generation if not managed properly. This will be significant where compounds have been located like on the northern boundary of Site 4A where panels aren't planned;
- Although EPS have stated they will aim to minimise the removal of hedgerows and trees, areas for access and cabling as well as widening roads will have significant impact to vegetation loss. Several kilometres of significant hedgerows will be removed for CRC4.

Lifecycle Emissions (Indirect)

Manufacturing Pollution: The production of solar panels is energy-intensive and can involve hazardous chemicals, leading to indirect air pollution and greenhouse gas emissions;

Maintenance Phase:

Albeit operational emissions will be lower, the scheme still requires:

- regular van and 4x4 visits;
- vegetation maintenance;
- heavy plant repairs;
- panel and battery replacement at least twice across the scheme.

These trips will add to usual rural traffic particularly when combined with:

- Housing growth in Long Stratton;
- Agricultural and commercial traffic;
- Busy Hempnall roundabout;
- Long Stratton By Pass;
- Maintenance of other solar sites on the scheme;
- Tourism traffic

Decommissioning:

Similar to construction, the end-of-life phase involves heavy machinery and transport, generating temporary dust and emissions.

Cumulative Impact:

The construction of Site 4 will have a significant impact on local air quality to surrounding residents of the site and as well as the larger area when considered as a cumulative impact along side:

- The other solar sites on the scheme;
- Long Stratton By Pass;
- Long Long Stratton Neighbourhood Plan increasing housing by 1800 as well as a new school, employment hub and facilities;
- Grid upgrades;
- Cabling;
- Road and drainage upgrades;
- Agricultural HGV movements;

These large scale developments will see:

- Increase in diesel emissions;
- Repeated dust events from multiple construction sites;
- Prolonged periods of poor air quality with no recovery time;
- Increased exposure to poor air quality to recreational use of land; or
- Reduced recreational use of land;
- Reduction in tourism to the local area;
- Increase to poor air quality to wildlife and vegetation;
- Dust deposits on listed buildings including vulnerable structures like St Michael's Church;

The cumulative burden is far greater than the East Pye Solar scheme alone.

Residents:

- Increased exposure to diesel emissions and particulates;
- Reduced outdoor recreation use;
- Dust deposits on homes, gardens and vehicles;
- Dust deposits on businesses and conservation area ;
- Reduced feeling of worth and sense of being;
- Reduced tranquility to rural environment;
- Sense of change to rural environment to industrial environment

Heritage:

- Dust deposits on vulnerable structures and surfaces materials;
- Reduced sense of tranquillity surrounding St Michael's Church

Wildlife and Habitats

- Dust smothering hedgerows, flowers and fauna;
- Dust smothering protected ancient trees and woodland habitats;
- Dust entering the water courses and run off into river Tas making the white clawed crayfish breeding ground vulnerable;
- Toxins entering the food supply to wildlife;
- Dust on land used by ground nesting birds;
- Stress on air-quality sensitive species

Public Rights of Way/Bridle Paths

- Walkers, cyclists and horse riders exposed to dust clouds and emissions;
- Reduced enjoyment of rural routes

Tourism

- Reduction in local visitors to the area;
- Reduction in tourism to Norfolk overall as the cumulative impact spreads.

Chapter 14: Socio-Economics, Health and Wellbeing Impacts

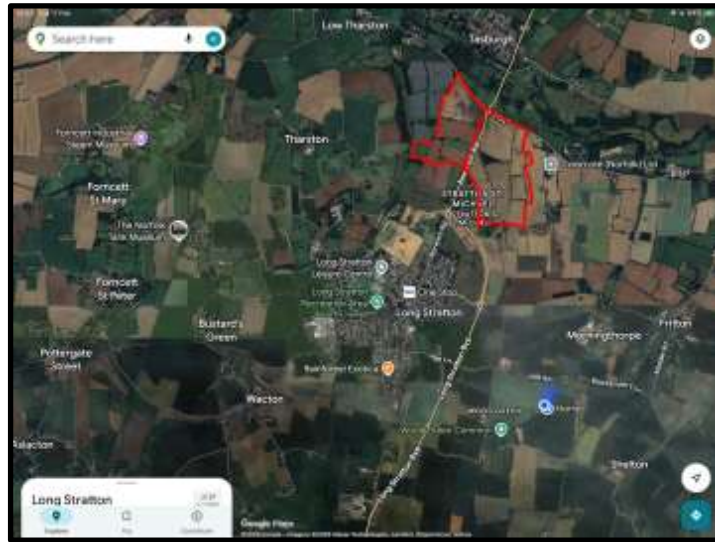
Introduction

In August 2025 the long-awaited Long Stratton by-pass was finally opened after ~£50m investment, 18 months construction and nearly 90 years since it was first proposed.

The by-pass is part of the Long Stratton Neighbourhood Plan 2019-2036 (adopted) to pave the way for 1800+ more homes; 600 homes are already in construction to the north west of the town, from Swan Lane to Brand's Lane. The other 1200 homes, new school and community area will be located in the area to the east of the town between the bypass and the current housing area.



The northern point of the bypass joins the A140 only a few hundred meters from site 4.



The bypass followed the construction of the Hempnall roundabout in 2018 at a cost of £4m which replaced the notorious Hempnall junction seeing 8 major accidents in 5 years. It now supports more than 20,000 vehicles daily.

The Hempnall roundabout was the start of the Long Stratton expansion plans and is the proposed location of access point A19 to Site 4A

14.1 Health, Wellbeing and Quality of Life

The health and wellbeing of local communities should be given greater consideration in the assessment of East Pye Solar. The development is not simply a change in land use. At the scale proposed, extending across approximately 3,000 acres and involving solar arrays, substations, cabling, access tracks, construction compounds and associated infrastructure, it has the potential to affect the everyday living environment of a substantial number of residents over a prolonged period, and already is.

Many local people have been fighting this proposal for over two years so far. Anxiety, stress, sleepless nights, uncertainty, financial worries are just a few emotions residents are feeling. When speaking to two 90 year residents at a Block East Pye Solar event, they spoke about living in Hempnall all their lives. They accepted that if consent was given that they probably wouldn't be around to see it built, however they said they feel so strongly against the proposal that they would rather go out in a box fighting for future generations and an area they love than do nothing at all. That is not what someone at the end of their lifetime should have to do, is it?

Health and wellbeing should be understood broadly. They include not only physical health, but also mental wellbeing, quality of life, access to amenity, tranquillity, the enjoyment of homes and

gardens, access to the countryside, community cohesion and people's sense of security and permanence in their local environment.

Construction Impacts

The construction phase has the potential to be particularly disruptive. Residents will experience increased HGV and construction traffic, noise, vibration, dust, temporary lighting, road restrictions and closures, construction compounds and disturbance associated with cable installation and other infrastructure works. These impacts will not necessarily be experienced independently. For residents living close to construction routes or compounds, the combination of repeated traffic movements, noise, visual activity and loss of tranquillity could create a prolonged deterioration in residential amenity.

The duration of construction is also important to acknowledge. A project of this scale cannot reasonably be considered a short-term inconvenience where construction activity is expected to occur across a large geographical area and in different phases. The cumulative effect of repeated disturbance should therefore be considered alongside the individual technical assessments.

Mental wellbeing and uncertainty

There is also a legitimate socio-economic and wellbeing dimension to prolonged uncertainty. Residents who live close to the proposed developments may face years of uncertainty concerning construction, traffic, landscape change, views, property use and the future character of their surroundings. This can affect people's sense of control over their home environment and their ability to make long-term decisions concerning their homes and businesses.

This is particularly relevant where people have chosen to live in a rural area because of its tranquillity, open landscape and access to the countryside. The introduction of extensive industrial-scale energy infrastructure will fundamentally alter those characteristics.

Loss of amenity and access to the countryside

The countryside surrounding villages such as Long Stratton and all those affected by the proposal provides recreational, visual and amenity value to residents and visitors, including tourists. Public Rights of Way, Bridle Ways, quiet country lanes, agricultural landscapes and open views contribute to physical activity, recreation and mental wellbeing.

The assessment should therefore consider not only whether individual rights of way remain technically open, but whether their recreational value and enjoyment are diminished by construction traffic, noise, fencing, solar arrays, substations, cable works and changes to the surrounding landscape.

Additionally, consideration should be given to increase risk specifically to women, young people and those more vulnerable where line of sight and 'escape routes' have diminished.

Cumulative effects

The health and wellbeing consequences should also be considered cumulatively. A resident may experience relatively modest effects from individual aspects of the proposal - traffic, noise, visual impact, construction activity or loss of tranquillity - but the combined effect will be substantially greater than any single assessment suggests.

This is particularly important for residents closest to the development and its infrastructure, including those affected by the proposed cable routes, construction compounds, access routes and substations.

The Applicant should therefore demonstrate that it has properly considered the cumulative effect of these factors on community wellbeing rather than relying on individual assessments which may each conclude that effects are acceptable in isolation and often labelled as insignificant or minor.

Socio-economic consequences

There is also a potential relationship between environmental change, wellbeing and economic confidence. Prolonged uncertainty about a major infrastructure project is already in some cases affecting people's decisions to move, invest, expand businesses, tourism, agricultural activity and the attractiveness of the area should therefore not be dismissed simply because individual financial impacts may be difficult to quantify.

The issue is ultimately one of proportionality. The benefits of renewable energy must be balanced against the consequences for the communities required to host the infrastructure. Where development of this exceptional scale imposes prolonged disruption, loss of amenity and substantial changes to the environment in which people live, those impacts should form a meaningful part of the planning balance.

Conclusion

East Pye should therefore be assessed not solely in terms of individual environmental thresholds, but in terms of its combined effect on the health, wellbeing and quality of life of affected communities.

During the Planning Process, appropriate weight should be given to the prolonged construction disturbance, changes to tranquillity and landscape, loss of amenity, potential community disruption and the cumulative burden placed upon residents throughout the process including now. These impacts should be considered alongside the project's socio-economic effects when

determining whether the claimed benefits of East Pye Solar outweigh its consequences for the communities required to accommodate it.

14.2 Impact to tourism

Long Stratton sits in the heart of South Norfolk and within easy reach of multiple tourist destinations, local as well as county wide. The north Norfolk coast is within an hour's drive and the Norfolk Broads within 30 minutes.

Long Stratton is centrally located between the historic, and cultural county capital of Norwich to the north and the historic market town of Diss to the south; both only 10 miles away.

The Suffolk historic market town of Bungay is 8 miles to the east with Wymondham 8 miles to the west.

The impact to the local, and wider area, is likely to have a significant negative effect on the local economy and must be considered.

The City of Norwich is an easy 20-minute drive up the A140 and can also be reached by direct train from Diss or a direct bus from Long Stratton to the city centre.

Norwich is a popular destination for long weekends and short trips to enjoy the visiting London shows at the Norwich Theatre as well as the two impressive cathedrals of St John's Catholic Cathedral and the Norwich Cathedral in Tombstone. Pop-up galleries, many independent shops like Jarrod's Department Store as well as many restaurants serving locally sourced food. The University of East Anglia with the green space of Earlham Park is the home to the amazing Sainsbury's Centre art exhibition facility and are also very popular tourist destinations.

The proposed East Pye Solar project, including Site 4, raises major concerns that it will disrupt local tourism in South Norfolk by transforming rural landscapes into industrial-style energy sites and can't be ignored nor avoided by anyone using the A140 north or south.

The development of 2,700+ acres of land near picturesque local villages such as Hempnall, Saxlingham, Great Moulton and Brooke as well as the central hub of Long Stratton, has led to concerns about its impact on the "enjoyment of the countryside" and the viability of local, rural-based tourist businesses, such as holiday lets, local pubs and restaurants, and small activity sites like the Tank or Steam Museums. These businesses rely on tourism and can be the 'make or break' for some.

Potential impacts on local tourism include:

- **Alteration of Rural Character:** The 4.5m high solar panels (tracker panels), multiple substations and BESS at Great Moulton will negatively affect the scenic, quiet, and rural nature of the area, which is a major draw for visitors and tourists;

- **Impact on Local Accommodation:** Local residents, such as those running holiday lets fear that the industrial-like installations will make their businesses "completely unviable" because guests come for a quiet, rural experience;
- **Visual Impact and Amenity:** industrialisation of the countryside and the visual impact of the panels and industrial infrastructure will detrimentally impact tourism receptors;
- **Construction Disruption:** a minimum of 2 years construction noise, traffic, and road closures associated with the project could **permanently** discourage tourists and impact local tourism-based businesses;
- **Loss of Public Amenity:** The development will affect public rights of way, and inhibit the enjoyment of walking in the area, a popular activity in South Norfolk;
- **Construction Traffic:** road safety will be negatively impacted, making cycling, horse riding and walking on previously quiet roads and lanes unattractive.

The scale of the project will significantly alter the area's attractiveness, affecting the local tourism industry, particularly around the 26 villages where the solar panels and battery storage are planned.

The A140 and B1527 are main routes into and out of Norfolk and Suffolk. They will be significantly disrupted over the 24 or so months of construction, with traffic delays caused by East Pye Solar construction vehicles and road alterations having negative impacts for tourism and businesses in local areas as well as county wide.

The A140 is a main route to the Norfolk Broads National park that attracts almost 8million visitors a year. The Old Buckingham Airshow, 9 miles to the west of Long Stratton, attracts 10,000 visitors over the two-day event, which includes displays by the Red Arrows.

Locally, the Tank and Steam museums at Fornsett; the Woodlands Trust Tyrells Wood named as one of the most beautiful woods to visit; walking and cycle routes of Boudicca Way and Rebellion Way; and many local farms diversifying with family activities, tea shops, restaurants and farm shops.

With great transport and road networks to all areas of Norfolk, Long Stratton and the surrounding villages affected by the East Pye Solar scheme, are a good and popular choice for visitors not wanting to stay just in the city.

Two or more years of construction disruption as well the long-lasting visual effect of the scheme is enough to ruin multiple businesses in the local area.

South Norfolk alone contributes more than **£212 million** annually to the local economy.
Broadland and South Norfolk

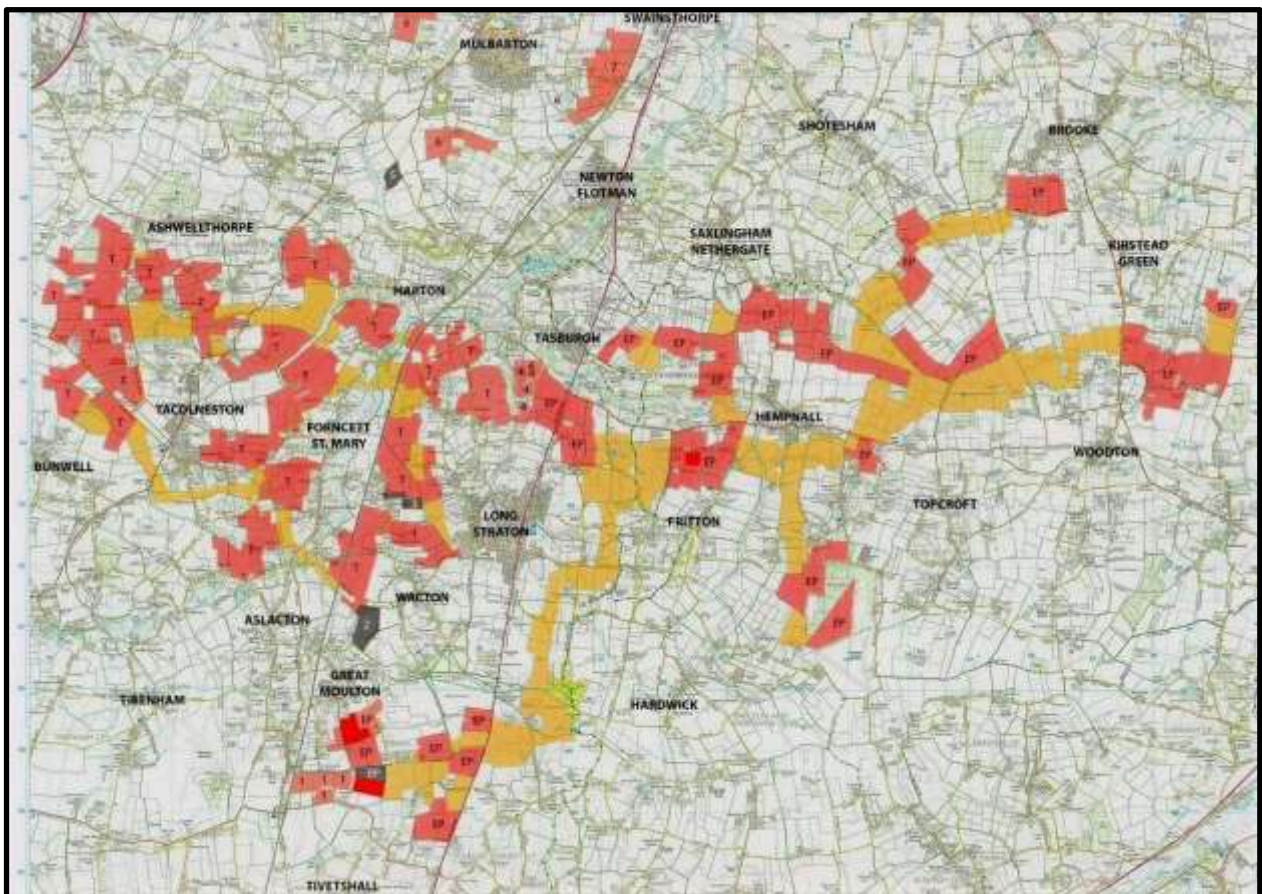
This figure reflects a significant visitor economy that supports nearly **4,000 jobs** and involves over **1,200 businesses** across the district and the tourist sector remains a critical pillar of South Norfolk's growth strategy.

Broadland and South Norfolk

Key points regarding the local tourism economy include:

- **Wider County Impact:** Tourism is one of Norfolk's largest sectors, worth approximately **£3 billion to £3.6 billion** per year to the county. Norfolk County Council
- **Strategic Growth:** South Norfolk Council recently identified the visitor economy as a priority for its 2024–2028 Strategic Plan, focusing on its eight market towns. Broadland and South Norfolk
- **Employment:** The sector accounts for nearly **20% of all jobs** across Norfolk, including South Norfolk's rural areas. Norfolk County Council

With Tasway Solar Park paused in planning but proposing to use East Pye Solar infrastructure if passed, the cumulative impact of East Pye and any further renewable industrial infrastructure on Norfolk will have devastating effect to local and county wide tourism which will struggle to recover when the county is an unattractive place to visit.



14.3 Impact to local businesses

The Long Stratton by-pass was built to protect and support the growing area of Long Stratton as a central hub serving the surrounding network of villages and hamlets.

The Long Stratton Neighbourhood Plan (adopted) alongside the Long Stratton Enterprise/Community Plan is to help cement a foundation in the growing town that maintains the historic and heritage feel of the village with the expansion of housing and community resources. A correlation between the old and new.

Supporting local independent existing businesses within Long Stratton as well as those dotted around the scheme, like Tilla Farm Shop at Fairstead Lane, Goodies at Wood Lane and the Pulham Patch, will encourage new investment from independent retailers rather than large corporate chains.

Site 4 on the northern boundary and Site 2C to the south of Long Stratton will create a tunnel of panels along the A140 that can't be missed and will make people keep traveling through and not stopping. Whilst the 132kV substation at site 4B and the 400kV substation on 5A, a short distance along, will be fully visible from the B1527 to/from Bungay and the Suffolk coast.

With a considerable impact to the Hempnall roundabout and the A140 itself, the area will potentially be avoided completely which is what happened during the by-pass construction when sat navs found alternative routes. Goodies Food Hall experienced a 25% downturn in business due to the by-pass construction that also coincided with construction of Bloys Grove Solar and Swainesthorpe Bess further up the A140 that caused massive traffic disruption.

In addition to tourism, deliveries will take longer to arrive which will impact local jobs and businesses that rely on this service.

Trades, like building contractors and independent businesses like plumbers, will take longer to move about the area, impacting the number of jobs taken on per day and potentially raising prices or losing money.

Two businesses that will be forced to endure severe impact if East Pye Solar is consented aren't even listed within the documents yet are some of the nearest, if surveys were done.

**Goodies Farm Shop and Restaurant, Wood Lane, IP21 4XU has been significantly impacted by the construction of the Long Stratton bypass with road closures and traffic delays causing a reduction in customers whilst the area became challenging to access.*

I have permission to include Goodies Written Representation as part of my document

Stuart
Director of Goodies Farm Shop and resident at French's Farm
French's Farm, Wood Lane, Pulham Market, South Norfolk, IP21 4XU

Gooderham
Farm

I object to the proposed construction compound and cable works near my home at French's Farm and Goodies Farm Shop because of their potential impact on our living conditions, business and access.

Impact on my home

I have been advised that a construction compound of approximately 13 acres could be situated immediately outside my home for around two years. I am concerned about prolonged noise, dust, lighting and heavy vehicle movements affecting my home and garden.

Please confirm the compound's exact location, size, duration and working hours, explain why this location was selected, and demonstrate that alternatives further from occupied homes have been considered.

Impact on Goodies Farm Shop and staff

Goodies is heavily dependent on passing trade from the A140. During disruption associated with construction of the Long Stratton bypass and the works at Swainsthorpe, **we recorded sales declines of over 25%, placing enormous financial pressure on the company.** The 2025 Swainsthorpe disruption was associated with electricity cabling works on the A140 for EDF's Bloy's Grove solar project.

Further congestion, closures or diversions could deter customers, reduce passing trade, delay deliveries and disrupt staff travelling to and from work. Keeping our entrance open would not, by itself, protect the business from these effects.

Please assess these impacts specifically for Goodies, including the combined effects of compound traffic, cable installation beneath the A140 and any other planned roadworks, closures or diversions in the surrounding area. This should cover customer journeys, staff commuting and delivery routes. We can provide supporting sales information.

Information and safeguards required

I request:

- Details of the A140 crossing method, programme, traffic restrictions and arrangements if works overrun.
- Construction traffic routes, expected vehicle numbers and measures to protect customer, staff and delivery access.
- Coordination with Norfolk County Council and other works promoters to avoid overlapping road disruption and minimise the combined impact on trade and access.
- Enforceable controls on working hours, noise, dust and lighting.
- Advance notice of disruption, clear access signage and a named contact to resolve problems promptly.

Our June 2026 Preliminary Ecological Appraisal also records nesting birds and identifies the need to control lighting near trees potentially used by bats. Please confirm that any relevant effects of East Pye's nearby works have been assessed.

I ask that these concerns are addressed before consent is granted and that alternative compound locations and measures to minimise road disruption are fully examined.

Stuart

Director, Goodies Farm Shop and resident at French's Farm

Gooderham

**Pulham Patch, Wood Lane IP21 4XU was created in 2023 to diversify some farm land from a fifth generation family farm that has been farming this land since the 1920's. The Pulham Patch opened the Pumpkin Patch in October 2023 and following the success of that has created an Easter Trail with PYO Daffodils, the Maize Maze and PYO Wildflowers/Sunflowers with rid-on tractors, bale mountains, play area and Craft Ark in the summer. A local, inexpensive family attraction that educates children about the land and allows families to enjoy time together.*

The CRC4 will go straight through this business destroying everything that has been created since it was started, including local employment, whilst removing external outlets that provide additional services like refreshments. This cannot be mitigated against.



The Red represents the Cable Route Corridor 4 that will dissect the Pulham Patch land that abounds Tyrell's Wood and comes within tens of metres of Goodies Food Hall

14.4 Impact to agricultural contractors

Employment to local residents in agricultural service is one of the main areas of employment in rural environments, particularly in South Norfolk.

Due to the large area of agricultural land proposed for East Pye Solar, there will be a drop in demand for agricultural workers as local farmers and landowners will require less help. This, in turn, could lead to a lower sense of worth within the agricultural employment sector as well as less income, poorer communities and less local food providers leading to food traveling further to meet demand.

Local contractors may re-vocate to other jobs or move to another area for work as supply and demand changes. Agriculture employs the largest workforce across the UK and food security relies on knowledge and experience often passed down through generations and from a very early age.

This makes jobs in the following areas vulnerable as agricultural workers do more than just 'work' the land, they are custodians of the land and countryside for generations to come:

- Ploughing
- Spreading
- Sowing
- Drilling
- Spraying
- Fertiliser spreading
- Harvesting
- Baling
- Hedge cutting
- Ditch maintenance
- Road drainage support
- Snow clearing
- Road clearing from fallen trees
- Footpath maintenance
- Seed Providers
- Agricultural Merchants
- Machinery providers

Land parcel 4, if taken for solar arrays and substation, will go towards the loss of 2718 acres of BMV agricultural land in South Norfolk and this will be for a time span of 60 years or forever as soil would be downgraded to poorer quality.

East Pye Solar have not indicated how many full-time jobs will be created during the operational phase of the scheme but based on other large scale solar projects such as Sunnica, typically very few permanent staff are required across the scheme during the operational stage of the proposal. This scheme will reduce local employment within the extended agricultural sector by more than the jobs created if allowed to go ahead and reduce a sense of worth in the industry.

East Pye has also stated that it is not anticipated that during the construction and decommissioning of the scheme that any local new jobs will be created as an existing workforce, temporarily relocated, will be used. This is clearly at odds with Chapter 6 of the National Planning Policy Framework.

14.5 Impact to home values

Site 4 sits at the northern gateway to Long Stratton with site 2 at the southern gateway. The entrance and exit will be like a tunnel of panels announcing Long Stratton to anyone entering the area or bidding them farewell. However, why would anyone want to stop?

- Falls in the value of houses near to utility solar farms are one of several ‘externalities’ of solar farm construction rarely considered or, if so, routinely dismissed by solar farm developers;
- Although some developers and valuers claim there is no effect, or even a slight increase in the value of houses near to solar farms, more careful studies reveal an adverse effect;
- The closer to a utility solar farm and the larger the installation, the greater is the adverse impact on house values. Houses in more rural areas are more likely to be affected than those in more urban areas as the market is generally slower, although it is difficult to quantify this effect.

<https://www.solarq.org/propertyanalysis>

Some local estate agents have predicted a 30% drop in house price to anyone within the immediate vicinity, during and immediately post development compared to pre-proposal. To some that is several hundred thousand sterling and has already made their home unsaleable and in negative equity.

House prices are also less likely to recover post development, especially in the countryside where people want fields not industrial infrastructure. Who would choose to live in an area that has been industrialised or at risk of further industrialisation? I wouldn't, would you?

Long Stratton has planned expansion as part of the Long Stratton Neighbourhood Plan (2019-2026) for 1800+ homes, a school and community space over the next 10 years. Creating a sense of being, a desired place to live, work and invest.

Norfolk Homes are already building 600 homes on land north west of Long Stratton called Tharston park, with 213 homes launched February 2026 and phase 2 to follow. This development will border Brand's Lane. Tharston park will be within 100m of plot 4A and opposite plot 4B.

Within metres of Plot 4A and Plot 4B, and within full site of the development, are a number of listed properties including the Cedars, Cedars Cottage, Dairy Barn, Tumbrel Barn, The Red House, Well Meadow Cottage on Norwich Road; Thatched Cottage, Rectory Barn and The Old Rectory are on Church Lane; The Hollies, Brick Kiln Cottage, Hollies Farm on Brick Kiln Lane. Shrublands is an isolated home up Brand's Lane and surrounded by rural views across the Tas Valley. All these properties have clear and uninterrupted views over open farmland at present. This proposed development absolutely dwarfs all of these properties. Destroys the property value, removes amenities and significantly ruins quality of life in this rural environment.

There is no way that all the properties that surround site 4 could avoid glint and glare. It would be an ongoing problem and constant source of complaint. In three cases, the listed buildings are sandwiched between sites 4A and 4B.

These lands have been farmed for hundreds of years by their respective generations. Worshipers and visitors to the St Michael's Church for the past 600 years have marvelled at the pastoral views.

This proposal would change that to a vista of security fencing, CCTVcameras and black glass panels higher than a double decker bus.

The negative effect of East Pye Solar on surrounding homes, Long Stratton and the surrounding countryside cannot be mitigated against.

14.6 Impact to home insurance

A large-scale industrial development nearby to residential properties can significantly impact home insurance policies, leading to:

- increased premiums;
- tighter underwriting restrictions;
- in some cases, difficulty in renewing coverage.

Increased premiums are the primary impact due to:

- Increased presence of machinery;
- higher traffic;
- potential environmental hazards increasing risk;
- Elevated fire risk

Large scale developments can change the local topography affecting natural drainage and potentially flood risks. Reducing natural barriers can exacerbate windstorm risks.

Restriction of coverage to basic perils, rather than comprehensive cover, if perceived risks are too high.

Construction Risks:

Ongoing development can cause;

- noise;
- vibrations;
- dust;
- heavy traffic

Hazards can be temporary but also can also cause more permanent damage especially to vulnerable, older structures like the Grade I St Michael's Church, clay-lump and wood framed structures.

Changing the nature of the soil can increase or reduce moisture which, in turn, can affect buildings close to developments potentially causing subsidence.

Large-scale solar farms can have an indirect impact on house insurance, primarily through potential changes to property value.

14.7 Cumulative Impact of all proposed development

The cumulative impact of the proposed East Pye Solar scheme, the Long Stratton Neighbourhood Plan, including Tharston park and the development for the by-pass land, and the associated infrastructure is expected to create a "re-engineering of South Norfolk's rural fabric". The combination of massive solar industrialisation and rapid urban expansion (doubling the town's size) will likely lead to significant, long-term changes to the landscape, traffic patterns, and community structure of South Norfolk.

Key Cumulative Impacts:

- **Industrialisation of the Landscape:** East Pye Solar coupled with other nearby proposals of Tasway, creates a massive, continuous "energy zone" of panels and battery storage (BESS) bordering and surrounding the residential growth in Long Stratton. Including the Bloy's Grove energy development at Mulbarton 5 miles away (in construction) and the massive energy development on the A47 this transforms a predominantly agricultural area into an energy-industrial landscape or factory.
- **Residential and Visual Impact:** The combination of 1,800+ new homes and solar panels up to 4.5m high (described as the height of a house) will cause significant visual impact on local residents and users of public rights of way.
- **Traffic and Infrastructure Pressure:** While the Long Stratton by-pass aims to relieve the town centre, the combined construction traffic from both the 1,800-home development over the next 10 years and the 500MW East Pye Solar project will likely place immense, prolonged pressure on the A140 and surrounding rural lanes. East Pye Solar have already reported the impact on the A140 by-pass is greater than acceptable and alternatives now need to be found;
- **Agricultural and Ecological Impact:** The loss of significant areas of productive farmland to both solar panels and housing development is a major concern.
- **Community and Social Changes:** The transformation of Long Stratton from a village to a small town (doubling its population), combined with the surrounding rural areas being filled with solar, will permanently change the character of the area.

Specific Project Details:

- **East Pye Solar (Island Green Power):** A Nationally Significant Infrastructure Project (NSIP) aiming for 500MW, impacting villages like Hempnall, Great Moulton, and Saxlingham Nethergate, with potential compulsory purchase of land.
- **Long Stratton Development Plan:** Aims for 1,800 new homes, new bypass, schools, and employment land, effectively doubling the town's size. Broadland and South Norfolk

The cumulative effect, according to CPRE Norfolk, is that the area could become a focus for further industrial development.

Conclusion

There is a very strong and defensible argument that East Pye Solar has the ability to cause localised economic blight, property-value effects, business uncertainty and changes to rural economy.

There is evidence that nearby houses are already being affected with the scheme now forming part of local authority searches and East Pye documents themselves acknowledge the issue.

Jenny Harrold has given me permission to share her experience as an example of how the proposed development is already causing a housing market downturn in the area. In a cost of living crisis, where mortgage rates have just hit 6%, homes are already unsaleable or and sales are falling through.

Her email was sent 6th October 2026 to the Planning Inspectorate requesting to be included as an Interested Party due to lack of consultation.

“Dear Case Team,

I am writing to urgently request that the Examining Authority exercises its discretion to grant me Interested Party status, or alternatively, accepts this correspondence as material evidence for ongoing examination.

Although I missed the initial registration deadline (in June), a significant change in my personal circumstances has occurred which directly relates to the socio-economic impacts of this proposed development.

I was in the process of purchasing a home in the immediate vicinity of the project area (a new build on Frith Way, Great Moulton). However, due to discovering the scale, proximity nad potential impacts of the East Pye Solar Farm proposal, I have felt compelled to formally withdraw from the property purchase. I was not warned about irs scale or impact by either my estate agent, the developer or my solicitor - all of whom have failed in their duty to legally inform me of this material information. This suggests that they each recognise the huge negativity this project brings to the area.

This is a direct, measurable example of residential and market blight caused by this scheme. I believe this serves as important real-world evidence regarding the project’s impact on the local community and economy.

I have conversed with many locals regarding the East Pye proposals since my situation and realised there are others in the same position as myself, also pulling out of their purchases at the moment.

Many locals are so distressed by the proposals that they are unable to sleep at nigh due to the sheer worry of this huge disaster coming to our local countryside.

I kindly ask that the Examining Authority takes this evidence into consideration.

Yours Sincerely

[REDACTED]

[REDACTED] [\[REDACTED\]@outlook.com](mailto:[REDACTED]@outlook.com) Please **redact** personal information before publishing

The project's Equality Impact Assessment APP/7.19 says there is **mixed and limited UK longitudinal evidence** but acknowledges there are studies finding significant house-price impacts in particular distance and orientation circumstances. It specifically recognises concerns about both **housing prices and revenue of tourism-related businesses such as B&Bs and tourist accommodation**. NSIP docs

A peer-reviewed study of England and Wales found that properties **within 750 m south of an operational solar farm greater than 5 MW experienced a 5.4% reduction in relative prices**. The researchers found no statistically significant effect beyond 750 m or for smaller installations. The disamenity of solar farms; a hedonic analysis - University of Birmingham, 2022

However, it should be noted that a utility sized scheme has yet to be built, especially one that covers such a vast sprawl as East Pye Solar does.

Another peer-reviewed study found negative effects particularly associated with **large installations, rural locations and solar development on agricultural/greenfield land**, with estimated reductions of 2.5–5.8% for rural properties in its US dataset. ScienceDirect

Although these studies **do not establish that every house around East Pye would lose a particular percentage of value** they demonstrate that proximity to utility-scale solar can create a measurable property-market externality and because the vast scale and area covered by the development in comparison to a scheme covering a concentrated area, the larger area as a whole could be avoided in general. The villages are already being labelled 'Solar villages'.

However, the economic effect can extend beyond individual homeowners.

Imagine a rural area where there is:

- a very large solar development;
- construction compounds and haul routes;
- substantial changes to the landscape;
- long-term fencing, substations, BESS, cables and other infrastructure;
- reduced agricultural land use;

- uncertainty over what will ultimately be built;
- several other proposed energy schemes nearby.

The effect isn't necessarily simply:

solar farm → lower house price

It can potentially become:

solar development → uncertainty/blight → reduced attractiveness of properties → fewer potential buyers → longer marketing periods → reduced transactions → reduced spending/investment → uncertainty for local businesses.

There is some emerging evidence for that broader mechanism. A 2025 study of a utility-scale solar facility found not only house-price reductions but also **reduced housing turnover near the facility**, which the researchers associated with reduced demand. ScienceDirect

Businesses are potentially vulnerable in a different way

For a rural area such as the East Pye area, businesses should be separated into several categories.

Tourism and accommodation

Potentially affected businesses include:

- B&Bs
- holiday cottages
- farm accommodation
- campsites
- rural attractions
- pubs/restaurants dependent upon visitors
- walking/cycling-related businesses.

If their selling proposition includes **rural views, countryside character, tranquillity or landscape**, extensive industrial infrastructure could potentially affect their attractiveness.

This is particularly relevant because **East Pye's own assessment expressly identifies tourism accommodation revenue as a concern**. NSIP Docs

Agricultural businesses

East Pye's scoping material acknowledges potential disruption to farming activities and agricultural productivity, while arguing that landowners can receive an alternative income stream. NSIP Docs

That distinction matters: **a financial benefit to participating landowners isn't necessarily equivalent to a benefit to the wider local agricultural economy.**

It should also be noted that the 9 landowners that have signed up to the scheme will significantly benefit over the very many landowners that have not signed up and do not want it. These are being bullied, intimidated, threatened and forced to give up their land for cabling through compulsory access laws (or acquisition if refused), if consent is given.

Other local businesses

Construction could provide temporary expenditure and employment, but East Pye's own scoping assessment says much of the construction workforce is expected to be a **specialised workforce rather than new local jobs**, with opportunities for local residents therefore limited.

The documents also state that there are no full time jobs created on site once in operation.

The economic benefits are **temporary and concentrated, whereas some of the potential adverse effects are long-term and dispersed across the wider community.**

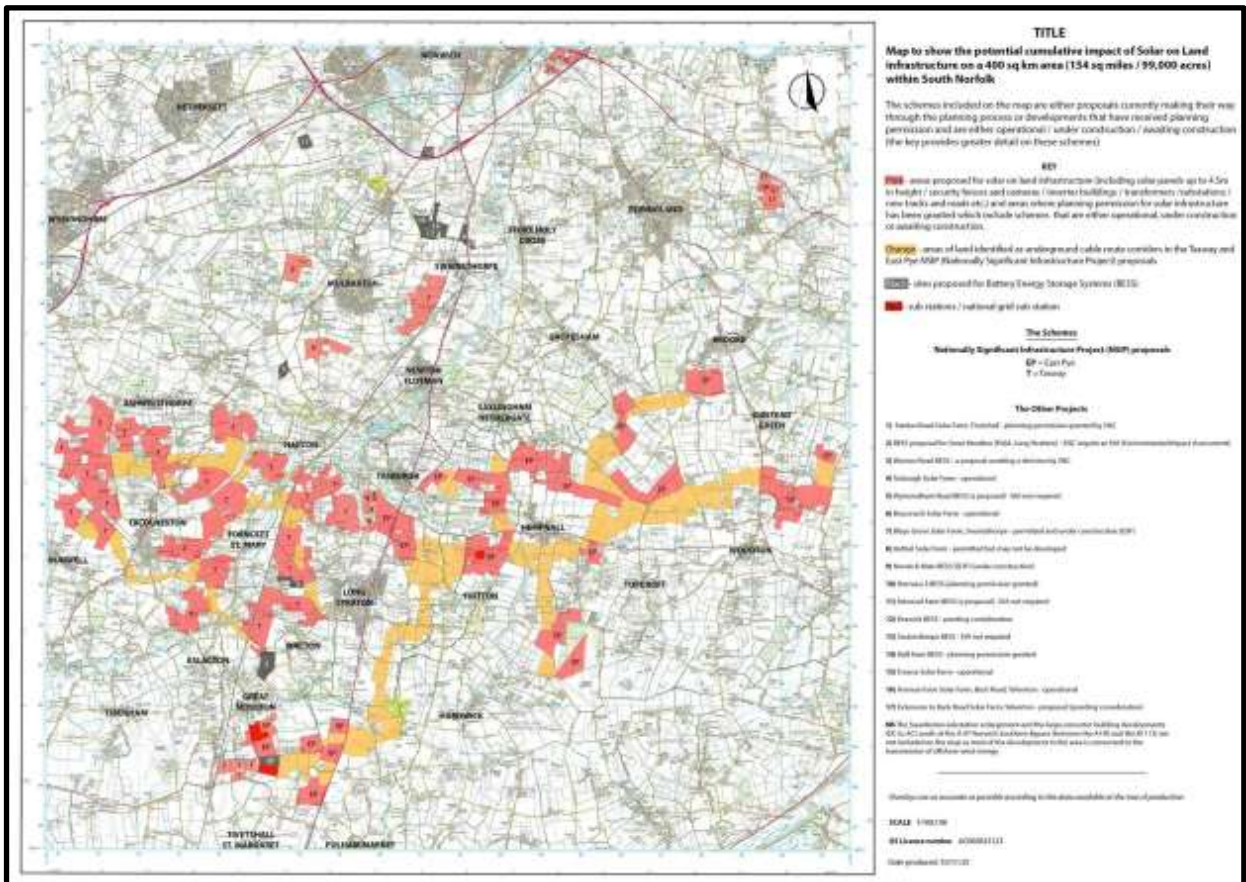
It should also be recognised that in any time of economic blight, especially during a cost of living crisis, people tend to 'tighten the purse strings' and reduce expenditure on home improvements and other non-essential items and works. This can have a knock on effect on local trades that rely on local expenditure.

The cumulative issue is particularly important:

East Pye in isolation is not the main issue but if the Long Stratton and further South Norfolk area is potentially exposed to **multiple large energy developments**, the question becomes:

Has the assessment adequately considered the cumulative economic consequences of concentrating large-scale energy infrastructure in the same rural property and business market?

The East Pye scoping documents actually record representations arguing that cumulative socio-economic effects from other solar NSIPs in the accumulative area should be considered because of potential impacts on **local property prices and tourism businesses**. NSIP Docs APP/6.3.2.2



East Pye Solar could cause “Potential localised economic blight and adverse cumulative socio-economic effects.”

Property-market effects

↓

Reduced housing demand/turnover

↓

Investment uncertainty

↓

Potential effects on tourism and rural businesses

↓

Loss/disruption of agricultural activity

↓

Temporary rather than permanent construction employment

↓

Cumulative effects from multiple energy developments

could produce a **materially adverse effect on the economic resilience and attractiveness of the affected rural communities.**

Can a developer dismiss this as simply an emotional objection?

East Pye's own documents acknowledge that evidence concerning **long-term UK house-price effects of large-scale solar is mixed and limited.**

Has East Pye actually quantified the potential economic consequences for the affected housing market and businesses, rather than simply acknowledging that evidence is limited?

For example:

- number of homes within 250 m / 500 m / 750 m / 1 km;
- number of businesses within those distances;
- tourism accommodation potentially affected;
- current property values;
- likely change in marketability;
- transaction times;
- cumulative exposure to other solar NSIPs;
- agricultural economic displacement;
- construction employment actually available to local residents;
- permanent operational employment;
- potential reduction in visitor expenditure;
- and the combined effect of all these factors.

Does this not form a **quite substantial socio-economic objection to East Pye**, particularly when considering the scheme sprawl across multiple villages in a 15 square mile area.

Chapter 15: Soils and Agriculture

Introduction

The National Planning Guidance with relation to Renewable and Low carbon energy states that consideration must include whether the proposed use of agricultural land has been shown to be necessary and poorer quality land has been used in preference. It also states that the proposed use allows for continued agricultural use.

With 34% of land considered Grade 2 BMV and 47% Grade 3a, a total of 81% of the cumulative scheme is of BMV highest quality.

East Pye Solar state they underestimated the quality of the soil across the scheme, expecting it to be of lower grade 3b-4, and 'it is of higher quality than initially anticipated'.

Can removing this BMV from permanent agricultural use be justified as acceptable use of land?

Site 4 is is classified as Enclosed Agriculture:

- Site 4 (A and B) is identified as mainly Grade 2 Best and Most Versatile (BMV) agricultural land with a BMV of >60%;
- Dudley Land Stamp use Inventory - Arable;
- Growing a mixture of crops including wheat, barley, oilseed rape and a wide range of break crops. Sugar beet is also grown widely in this area;
- Miscanthus is also grown annually on site 4A for biofuels;
- Site is is designated as a Climate Change as medium vulnerability buffer area;
- Rackman's Wood is situated in the north west of Site 4B and is an area designated as a **Priority Habitat Deciduous Woodland**. This would be entirely enclosed by solar panels and security fencing;
- Plot 4 is classified as entry level and higher level stewardship agreement;
- Higher Level Target;
- **CORE** Great Crested Newt strategic opportunity area;
- Land overall is classified as Arable and Horticultural and Deciduous Woodland;
- Lapwing Protected Zone;
- Various mature hedgerows and trees across both sites as well as small areas of woodland or ancient orchards.

Cable Route 4:

- **No land surveys have been carried out for the cable route;**
- All the land in CRC4 is arable and should be assumed BMV Grade 1-3a;
- High yielding, growing a mixture of crops including wheat, barley, oilseed rape and a wide range of break crops. Sugar beet is also grown on some fields;

- Temporary sheep grazing and haylage has been used to make best use of land post-harvest and before resting;
- The CRC is mainly a patchwork of smaller fields each surrounded by mature, established and well managed hedgerows with large areas naturally left to wild and wide borders allowing for grass and wildflowers to take hold. Typical characteristics of the Norfolk Claylands.

15.1 Impact of Solar infrastructure on Soil Quality

- **Adverse Impact:** although resilient to trafficking, when soils are wet there can be impacts on soil structure which may affect land quality;
- **Adverse Impact:** construction impact is highest when soils are wet with clay more receptive and susceptible to damage;
- **Adverse Impact:** compaction must be considerable to down grade but construction trafficking is not normal and will be considerable particularly on cable routes, compounds, substations, access routes, field tracks and haul roads. As a result, can have an adverse impact on soils and therefore land quality;
- **Adverse Impact:** Movement of soil can affect land quality adversely eg to create trackways and compounds or piling where soil is moved to the side in a concentrated area;
- **Adverse Impact:** Unsuitable handling and storage of soil if moved and not stored in the correct conditions, for example for construction compounds, Substations, CRC haul road and CRC cable works;
- **Adverse Impact:** Erosion and topsoil Loss - clearing vegetation and altering drainage patterns can lead to significant water and wind erosion, removing fertile topsoil.
- **Adverse Impact:** Microclimate Changes - Solar panels create shade, leading to lower soil temperatures and altered evaporation rates. This can create localised areas of higher soil moisture (under panels) but also lead to reduced water infiltration in other spots.
- **Adverse Impact:** Nutrient & Chemical Changes - Reduced rainfall under panels can decrease nutrient leaching, causing an accumulation of salts and minerals. The reduction in vegetation can reduce organic matter input, reducing soil carbon.
- **Adverse Impact:** Microbial Activity - The altered environment can change the composition and function of soil microbes, sometimes causing them to consume soil organic matter due to a lack of carbon inputs.
- **Adverse Impact:** farms businesses and farmers are resilient to change but land loss, land use change, severance and disruption, particularly when given no choice, could be considered a violation; creating feelings of helplessness and detrimental to mental health. This cannot be mitigated against and has it been considered?;
- **Adverse Impact:** it can take years to get soil in 'the right order', nurtured and managed including rested to get the best from it. Farmers know their land and how to manage it.

Disruption and forced to watch someone, who has no connection to your land, be responsible for your land will cause unmeasurable stress, worry and anxiety;

- **Adverse Impact:** Cumulative removal of BMV land from food production and the farming industry will affect local, agricultural and the rural economy including production of food, and other agricultural products. Effects on related sector like feed merchants, grain merchant, seed suppliers, machinery dealers, and farm contractors need to be considered.

The development of Groundmounted Solar Panels (GPVs) and associated infrastructure is likely to affect soils in a myriad of ways beyond just carbon, during both the construction and operational phases.

(A. Armstrong, S. Waldron, J. Whitaker, N.J. Ostle Wind farm and solar park effects on plant-soil carbon cycling: uncertain impacts of changes in ground-level microclimate)

Lancaster University looked at the impact on the land solar infrastructure is built on and noted that the soil health was affected.

The ground directly under the panels was more compacted, with implications for water infiltration and root growth. It contained lower levels of organic carbon and particulate organic matter (likely due to reduced plant productivity), essential for soil-related ecosystem services (e.g., soil carbon storage). The legacy of past agricultural activity was also evident, with relatively high concentrations of plant-available nitrogen and phosphorus in solar farm soils.

Plant growth and biomass were significantly lower beneath the solar panels than the gaps between them or open pastureland, a reduction attributed to decreased sunlight and changes in the microclimate under the panels.

<https://portal.lancaster.ac.uk/portal/news/article/research-sheds-light-on-solar-park-eco-impacts-but-clever-design-offers-a-solution>

Context-Dependent Factors:

- **Vegetation Management:** The presence of vegetation is vital for soil health; sites that manage vegetation well can mitigate negative impacts.
- **Soil Type & Climate:** Impacts are more severe in arid regions (dust) or areas with sensitive soil types.
- **Duration:** While some studies suggest soil can recover during long-term (20-40 year) resting periods, others indicate lasting, potentially negative changes.

15.2 Soils and Compaction

Site 4 of the East Pye Solar proposal lies within a landscape dominated by **high-quality agricultural soils mainly Grade 2 BMV**.

These soils are:

- Structurally intact
- Highly productive
- Crop rotated for best soil management
- Rich in biological activity
- Supported by long-established germinate systems
- Free from industrial disturbance

This baseline is **highly sensitive** to physical disturbance, compaction and hydrological change.

Soil compaction is a major, often long-term, environmental impact of ground-mounted solar farm development, occurring primarily through the use of heavy construction machinery.

It causes:

- structural damage,
- reduces water infiltration,
- increases surface runoff,
- negatively affects soil biodiversity and plant growth.

<https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-ssep21-22-03-work-package-4.pdf>

Impacts During Construction

- **Heavy Machinery Trafficking:** The movement of heavy vehicles during site preparation, trenching, and panel installation crushes soil particles and destroys soil structure, particularly when working in wet conditions.
- Guiding good practice **only minimises potential effects on soil and agricultural land quality**. 'Assumed to be capable of controlling mitigation' against soil and land quality damage during construction offers **no guarantee**;
- **Surface and Deep Compaction:** Compaction can occur near the surface or extend deep into the subsoil (up to 60cm or more), often requiring specialised equipment to fix.
- **Topsoil Degradation:** The compaction, along with stripping and storage of topsoil in bunds, can reduce its fertility and productivity;
- **Top soil storage** next to tracks and original locations will 'minimise' handling and support the success of replacing during restoration works in theory but in reality can this be guaranteed?;

- **Cable Route 4;** a 7.5m wide haulage road will be in addition to the cabling corridor construction. This was not documented in either the Scoping Report January 2025, the Pier Report June 2025 nor detailed in the targeted consultation in October 2025;

CRC4: Land has not been surveyed however should be assumed to be BMV Grade 2-3a.

It is high yielding and fertile, managed by family farms or contractors.

Trenching has significant long and short term implications for agricultural businesses:

- **Drainage disruptions:** trenching for the CRC will cut across existing land drainage systems which may not be fully mapped, leading to potential water logging, flooding, or erosion if not expertly repaired. **The field at Mill Road where the cable compound 2 is to be, replaced their whole drainage system in 2024;**
- **Disruption to soil structure and fertility:** stripping, storing and replacing topsoil, if not properly managed, can lead to compaction, structural damage and a reduction in long-term solid fertility;
- **Restrictions of future use (Easements):** permanent easements are often created, restricting what can be planted or built on top of cables. Tree planting, large agricultural buildings and some deep rooting crops are often prohibited;
- **Operation Disruptions:** during construction land will be out of operation due to lack of access including to linked fields not included in the scheme. Restricted access, loss of crops, disruption to farming practices is detrimental to business as well as the farmers mental health when they are not compliant with the scheme. Land violation without agreement;
- **Repairs to Underground cabling:** potential future interruptions are likely where underground bales take 25 times longer to repair;
- **Damage to Surroundings:** Contractors may damage hedges NOT planned to be removed, fences and local roads. **Reinstatement:** even though removing and replacing the topsoil is planned, agricultural area can take years to restore the land to its former productive state and in some cases the restoration may not address soil damage fully;
- **Infrastructure Management:** repair works will involve re-excavation and the cable corridor must be kept free of deep-rooted vegetation for several meters on either side of the trench. This means the several kilometres of mature and significant hedgerow due to be removed on CRC4 will not be replaced and will change the layout and character of the land for ever;
- **Impact on Agri-Environment Schemes:** the physical disturbance of the land may lead to loss of eligibility for specific environmental stewardship or subsidy schemes.

Although East Pye Solar will aim to minimise disruption, cable trenching could be a 'sacrifice' of farmland in the short to medium term. When a farmer hasn't volunteered their land but has it removed from their management without choice, that is a violation written into law.



Melton -Destruction caused when trenching cables and drainage





Photos are courtesy of D.M.J Civils Ltd demonstrating the construction of a haul road across agricultural land and the destruction to the fields.

Now equate that to the landowner who has nurtured that soil for decades to get the best from it. A landowner that operates good crop rotation and land management and is being forced to have their land removed from their care and stripped for a haul road without a say or approval and with limited compensation.

How can that be right?

15.3 Soils and Contamination

The soil structure across the proposed development **including site 4** is underlain by clay or clay-loam topsoils, often calcareous, typically farm greyish-brown to brown in colour. These overlie clay or clay-loam subsoils, usually grey, indicates periodic waterlogging, poor aeration, seasonal saturation and restricted drainage.



The subsoils are poorly structured and slowly permeable, making them highly vulnerable to compaction, sensitive to disturbance, prone to long term structural degradation and dependant on careful agricultural management.

As a result of this type of soil, the hydrological behaviour results in slow infiltration and high run off. This requires dependence on local ditch networks for drainage. **Changes to the structure of site 4 through development will result in persistent waterlogging and altered hydrological behaviour.**

Site 4 and surrounding fields is in long term agricultural use with good soil management maintained through controlled trafficking, seasonal cultivation with drainage, hedgerow and ditch maintenance. The consistency of this management regime is essential for soil health of the site as well as areas in direct runoff of the site, **including the river Tas.**

In conclusion, development of site 4 would damage clay and clay-loam soils that are highly sensitive to disturbance, would cause irreversible compaction and structural decline, disrupt hydrological pathways essential to drainage and water quality, increase contamination risk to private water supplies, reduce long-term agricultural productivity and contribute to cumulative soil degradation across not only Site 4 but also to surrounding areas.

These impacts conflict with:

- The NPPF (protection of soils and agricultural land)
- Local plan policies on soil safeguarding and environmental health
- Natural England guidance on soil protection
- The precautionary principle of water and soil contamination.

The effects would be significant and long term.

15.4 Impact of Microcracking, Leaching, Glass

The cumulative impact of solar panel glass cracking and subsequent **leaching** is a growing environmental and operational concern, primarily driven by **moisture infiltration**, which can cause toxic materials to seep into the surrounding soil and groundwater over time. While modern solar panels are designed for durability, cracked glass—often caused by hail, wind-blown debris, or improper handling—breaks down internal seals, allowing rain to dissolve and carry away hazardous materials, including **lead**, **cadmium**, and **selenium**.

<https://www.forbes.com/sites/michaelshellenberger/2018/05/23/if-solar-panels-are-so-clean-why-do-they-produce-so-much-toxic-waste/>

Environmental and Health Impact (Leaching)

- **Contamination Risks:** When rain or environmental moisture penetrates cracked panels, it can leach heavy metals and harmful substances into the soil. **Site 4 drains towards the river Tas tributaries where White Clawed Crayfish are breeding.**
- **Toxic Materials:** Depending on the panel type, this may include cadmium telluride (CdTe), which is considered a carcinogen, as well as lead solder (common in silicon panels) and selenium (in CIGS panels).
- **Groundwater Contamination:** Over a 15-30 year panel lifespan, or immediately following extreme weather damage, these pollutants can enter the surrounding environment and potentially reach groundwater.
- **Replacement of Panels:** panel exchange at least once if not twice across the whole scheme will guarantee some breakage of panels considering the law of averages;
- **Increased Waste Pollution:** Improper disposal or failure to manage broken panels can lead to increased contamination in landfills, particularly if they are not treated as hazardous e-waste.

Performance and Safety Impact (Cracking)

- **Significant Energy Loss:** Microcracks and broken glass reduce panel efficiency. Cracked areas can cause **hot spots** that further damage the panel, potentially leading to a 60% or more reduction in power output.
- **Safety Hazards:** Cracked panels pose an increased risk of electrical shock or fire, especially during wet conditions.
- **Shortened Lifespan:** While panels are designed for 20–30 years, accumulation of cracks can render a panel inoperable much earlier. YDOC

Long-Term Management Challenges

- **High Replacement Costs:** Unchecked cracked panels often require complete replacement, increasing the cost of ownership and reducing the return on investment.

- **Recycling Difficulties:** The accumulation of contaminants and the structural damage make recycling complex, with many damaged panels ending up in landfills rather than being properly processed.

15.5 Lack of Land Management Detail

The scoping report produced by East Pye Solar in January 2025 provides insufficient detail on how the land within site 4 will be managed during construction , operation and decommissioning. This omission totally undermines the credibility of East Pye Solar's claims regarding:

- Biodiversity net gain
- Soil protection
- hydrological stability
- Landscape mitigation
- Agricultural recovery post-decommissioning
- Control of contamination and chemical inputs
- Management of hedgerows, ditches and field margins.

Without a robust, enforceable Land Management Plan the environmental effects of the development cannot be properly assessed.

Without detail they cannot show compliance with policy and they cannot demonstrate mitigation effectiveness, they cannot prove their alleged biodiversity net gain and they certainly cannot guarantee soil or water protection.

East Pye Solar cannot be measured against something that doesn't exist and has been omitted.

This is a fundamental and serious flaw and cannot be challenged without detail and cannot be remedied with conditions.

15.6 Soil Recovery Plan

The scoping report produced by East Pye Solar in January 2025 also fails to provide any detail on the soil recovery plan for site 4 despite proposing to turn 250 acres of prime agricultural land into an industrial landscape for decades to come.

They have failed, to date, to detail how soils can be protected, hydrology can be restored, compaction can be reversed, contamination can be remedied and agricultural activity restored.

Long-Term and Reversibility

- **Persistence of Damage:** Soil compaction may take many years to recover and in some cases can be permanent.
- **Loss of Agricultural Value:** Compaction can lead to the loss of "Best and Most Versatile" (BMV) agricultural land, especially in wetter regions, by reducing its long-term versatility for future cultivation.

<https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-ssep21-22-03-work-package-4.pdf>

“conceptual models linking PV solar energy to soil carbon must incorporate (or at least acknowledge) climate dependencies. Hence, as the PV solar energy industry is expected to expand rapidly in the coming decades, the utility and results of existing soil Carbon frameworks in other sectors suggest that a universal framework between GPV development and operation, soil carbon, and broader soil health, may be timely.”

With a **haul road planned for the Cable Route Corridor 4**, removing and storing top soil and sub soil in bunds, soil compaction and disruption to field drainage systems among other things requires a soil recovery plan to be in place to support the loss of yield and quality through significant disturbance.

15.7 Lack of Decommissioning Bond

East Pye Solar has, to date, failed to provide a Decommissioning Bond, Restoration Guarantee or Financial Security Mechanism to ensure that the land will be fully restored at the end of the operation period.

The **Secretary of State** requested the applicant for **Botley West** to ‘*update the Soil Management Plan to secure the restoration of BMVL to at least their pre-construction agricultural land classification grade upon decommissioning. Appropriate monitoring to aid the soil restoration should also be outlined in the Soil Management Plan.*’

This omission creates a significant financial, environmental and legal risk for local authority, landowners and the wider community.

A bond is standard practice for developments that:

- Disturb agricultural soils
- Introduce contamination risks
- Install extensive underground infrastructure
- Require full restoration after long-term industrial use
- Are operated by Special Purpose Vehicles that may not exist in 40 years

East Pye Solar meets all of these criteria and the current absence of this Bond means that East Pye Solar fails to demonstrate financial responsibility.

Chapter 16: Ground Conditions

The bedrock geology is chalk deposits of Lewes Nodular Chalk, Seaford Chalk, Newhaven Chalk, Culver Chalk and Portsdown Chalk Formations, which are classified as a Principal Aquifer.

A primary (or principal) aquifer is a highly permeable, porous geological formation—such as sandstone, chalk, or limestone—that stores and yields significant quantities of groundwater for water supply, often on a regional or strategic scale. These aquifers have high intergranular or fracture permeability, allowing water to flow readily into wells, boreholes, or springs.

The superficial deposits are predominant Lowestoft Formation (diamicton), classified as a secondary undifferentiated aquifer, with areas of Lowestoft Formation (sand and gravel) in the north-west and areas of Leet Hill sand and gravel member in the north-east, which are both classified as Secondary Aquifers.

Site 4 consists of:

- Primarily free-draining loam to clayey loam with locally chalky deposits;
- BMV *Moderate to High* agricultural value of at least Grade 2
- **Gentle sloping mainly towards the north boundary and direction of river Tas.** Whilst 4A also has runoff on the south west boundary towards **Brand's Lane and the river Tas tributaries** in that direction.
- Permeable soils that support water recharge due to agricultural management.
- Minimal existing soil compaction due to agricultural management
- Sitting within the Nitrate Vulnerability Zone (NVZ) and requires managing or considered polluting
- North boundary of 4A where the temporary construction compound is due to be located, is prone to wind erosion if bare;

These soils are highly sensitive to disturbance, compaction and hydrological change.

- During the Construction, Operation, Maintenance and Decommissioning of site 4, the soil will become compacted as a result of long term construction works
- Topsoil will be mixed with subsoil, reducing fertility.
- This is a major risk for BMV land, which Site 4 is categorised as.

The long term health of the soil and agricultural productivity is at risk and will be downgraded.

These changes will alter natural drainage patterns, increase sediment transport into local ditches and reduce long term agricultural productivity of the fields.

Without a detailed soil management plan, compaction mitigation strategy and hydrological modelling, the proposal fails to demonstrate compliance with EN-1, EN-3, the NPPF and best practice for the protection of agricultural land and ground conditions.

1: There are two historic landfills within 1km of Site 4:

- Thorn Wood, which accepted inert waste until 1986, 330m north of sub-Site 4A;
- A former gravel pit which was later infilled with waste material and accepted commercial, household and gas control waste until 1992, partly located within sub-Site 4B.

Potential risks include:

- Contaminated ground;
- Leachate generation from buried waste;
- Migration of contaminants into groundwater and nearby surface water if disturbed;
- Generation of landfill gases such as methane and carbon dioxide;
- Uncertain geotechnical properties affecting foundation performance.

This is considered a **Moderate baseline risk** and construction has been designed to avoid disturbing the refuse tip footprint **where possible. But what if they do?**

2: Uncertainty in subsurface conditions

A recurring concern raised by regulators was that existing site investigation data covered only a relatively small proportion of the development area.

This creates uncertainty regarding:

- Depth of superficial deposits;
- Presence of made ground;
- Localised contamination hotspot;
- Groundwater conditions;
- Bearing capacity and pile installation conditions.

3: Groundwater Sensitivity

Site 4 lies within an area of sensitive groundwater resources in South Norfolk. Potential concerns include:

- Mobilisation of contaminants during pile driving or trench excavation;
- Effects of cable trenching on groundwater pathways;
- Pollution incidents during construction;

- Potential impacts on private water supplies and abstractions

The Environment Agency requested further hydrogeological assessment because of uncertainty regarding groundwater connectivity and abstraction locations.

4: Variable made ground associated with former quarry workings

The historical gravel extraction itself introduces engineering risks:

- Different settlement due to variable fill thickness;
- Soft or poorly compacted backfill material;
- Difficulties achieving pile refusal criteria for solar array supports;
- Potential requirements for local redesign of foundations or pile lengths

These risks are particularly relevant for tracker panel systems that rely on numerous driven steel piles.

5: Agricultural soil disturbance and compaction

Construction activities could cause:

- Topsoil compaction;
- Mixing of soil horizons;
- Reduction in agricultural land quality;
- Reduced infiltration capacity if if construction, operation, maintenance and decommissioning traffic is not managed appropriately.

Conclusion:

Relative significance ranking for site 4:

Risk Factor	Significance
Former refuse tip contamination	High
Unknown made ground from quarry infill	High
Groundwater contamination pathways	Medium-high
Limited investigations coverage/uncertainty	Medium-High
Agricultural soil compaction	Low-Medium
General geotechnical conditions for solar piles	Low-Medium

Further assessment is required for the former refuse tip and associated made-ground infill in Sub-site 4B to ensure it is safe to risk disturbance.

Chapter 17: Electromagnetic Fields

Site 4 is situated and surrounded by predominantly agricultural fields within the boundary of the parish of Long Stratton and forms the northern buffer zone between town and countryside as part of the Long Stratton Neighbourhood Plan.

The Conservation Area of Long Stratton is within a few hundred metres south of Site 4 with homes and business on the external fringe of Long Stratton, within the parish of Stratton St Michael surrounded by site 4A and 4B. The village of Tasburgh is 300m north whilst Fritton, Morningthorpe, Hapton, Tharston and Hempnall are within the nearby surrounding area.

Site 4A is bounded to the west by the smaller scale Hall Farm solar scheme that has been running since 2015 and for a duration of 20 years.

The proposal introduces multiple sources of electromagnetic fields (EMFs) into this rural and residential environment not just on this site but culminating across the area from nearby sites within a few hundred metres from site 4.

Site 4 includes inverters, transformers, the proposed 132kV Substation equipment, underground cabling and all the associated high voltage grid connection infrastructure.

Whilst EMFs are a normal by-product of electricity generation and transmission, the scale, proximity and concentration of equipment proposed for Site 4 creates legitimate concerns for residents, particularly where infrastructure is located close to homes, PRow, private water supplies and sensitive receptors including children and the elderly.

EMFs can cause annoyance and a nuisance as a result of the audible hum from transformers, disturbance to medical devices including pacemakers, and also interference with electronic equipment. Where properties are close to this, ie the properties within the curtilage of the Cedars (Timbrel Barn, Dairy Barn), Scrubland's in Brand's Lane, The Old Rectory, The Thatch Cottage and those in Church Lane as well as The Hollies Residential Mental Health Facility and other residential homes in Brick Kiln Lane, the impacts are more likely to be noticed; especially to children, elderly residents or residents with chronic health or mental health concerns.

UKHSA and WHO guidance recognises that public health concerns about EMFs is itself a health and well-being issue, even where exposures fall below guidance levels.

East Pye Solar has yet to provide an assessment to demonstrate that EMF exposure will remain within accepted limits or that residents will not experience nuisance, anxiety, or health-related concerns.

As there are no mega-scale solar and associated infrastructure research in the rural countryside of the UK to date, it is impossible to state categorically that there will be no impact to residents living and working within close proximity of these sites. But there are plenty of

anecdotal experiences where local residents to sizeable solar schemes are suffering a continuous hum and headaches since a scheme has been running including inverter noise at Cleve Hill in Kent and the permanent humming from the BESS at Swainsthorpe a few miles away from Site 4.

However it's not just humans that can feel the effects of artificial EMF. Nature uses the earth's magnetic field for homing, to navigate and to forage however are also very sensitive to disruptions.

17.1 Bats

Effects on Bats and Activity

- **Reduced Activity:** Studies, particularly in the UK and France, found that total bat activity was roughly halved at the boundaries of solar sites and dropped by two-thirds in the center.
- **Species-Specific Impact:** Six of eight species/species groups surveyed, including *Pipistrellus* and *Myotis* species, showed a significant decrease in activity.
- **Behavioural Alterations:** Bats at solar farms tend to shift their flight towards faster and straighter trajectories. This indicates a reduction in foraging (hunting) behaviour, likely due to reduced feeding habitat quality. University of Bristol, British Ecological Society, BSG ecology, Science [direct.com](https://www.sciencedirect.com))

Conclusion

There is limited research on the effects of EMF on bats however many insects can detect electric or magnetic fields. If EMFs alter insect distribution or behaviour, bats could experience indirect effects through changes in prey availability, albeit largely hypothetical.

The area surrounding and including the East Pye Solar scheme is of crucial importance regarding all bats however in particular the Barbastelle bats of which the area is of significant importance as a population enhancement area.

17.2 Bees

Bees are very sensitive to electromagnetic fields (EMF). Disruptions stem from both natural solar/geomagnetic storms and anthropogenic (man-made) sources. These forces can impair honeybees' ability to navigate, forage efficiently, and develop properly, which ultimately disrupts their crucial pollination services and plant reproduction (PubMed, [Science.org](https://www.sciencedirect.com))

Electromagnetic fields from solar panels, substations and power lines disrupt honeybee navigation, foraging efficiency and learning abilities. Because bees rely on Earth's magnetic fields and natural floral electric cues, artificial EMFs cause physiological stress and disorientation (PubMed 2023).

For some time, farming practices and the use of pesticides have been to blame for the decline in pollinators. But with the significant increase in man-made interference through renewable energy infrastructure, robust research on pollinator decline points directly to pylons and substations and the high-voltage infrastructure (PubMed 2023, 2018) (New Scientist 2023) (ehScience 2026)

Albeit solar and inverters generate relatively weak, primarily direct current the management of the sites are the main risk to these environments and resolve around poor habitat management.

Key Impacts on Bees

- **Navigation and Orientation:** Bees have specialised magnetoreceptor cells containing iron granules in the abdomen. High-voltage power lines and equipment can easily confuse these systems;
- **Foraging Disruption:** Research shows bees are less likely to visit flowers near strong EMF sources. Exposure has been linked to impaired olfactory learning and poor memory retention, leading to lost foragers and struggling colonies (PubMed 2023, 2018);
- **Electrical Noise:** Strong electromagnetic fields create static/parasitic signals around cables that can deter bees from landing on otherwise nectar-rich flowers

17.3 White-Clawed Crayfish

The white-clawed crayfish (*Austropotamobius pallipes*), an endangered freshwater crustacean, is susceptible to various environmental stressors, and emerging research suggests that **electromagnetic fields (EMF)** can act as a potential, albeit not fully understood, stressor on aquatic invertebrates.

Research indicates that low-level, non-ionizing EMFs—such as those from underwater power cables—can create environmental concerns and that existing safety standards, often designed for humans, may not sufficiently protect aquatic fauna.

nsip-documents.planninginspectorate.gov.uk

Key findings regarding EMF effects on crayfish include:

- **Synaptic Transmission Enhancement:** Studies on crayfish (specifically the lateral giant interneuron) have shown that static magnetic fields (SMF) (e.g., 8.08 mT) increase

the efficacy of synaptic transmission, particularly affecting the neural circuits responsible for "tail-flip" escape responses.

- **Ca²⁺ Dependent Potentiation:** The enhancement of neurotransmission by static magnetic fields is a calcium (Ca²⁺) dependent phenomenon.
- **Increased Activity/Stress:** While specific, long-term studies on *A. pallipes* are limited, broader studies on crustaceans suggest that high-intensity static fields can affect nerve functions and behavior, potentially causing increased stress or behavioural alterations.

Contextual Factors:

- **Conservation Status:** The white-clawed crayfish is already heavily threatened by invasive species (signal crayfish) and "crayfish plague," making them vulnerable to any additional anthropogenic stressors, including, potentially, electromagnetic radiation.
- **Habitat Impact:** The primary concern in the literature is that subsea or underground power cables (e.g., in renewable energy projects) generate EMFs that can affect benthic organisms such as crayfish. nsip-documents.planninginspectorate.gov.uk

Conclusion on Effects:

Breeding colonies of white clawed crayfish have been located in the river Tas and its tributaries, which are within a few hundred meters from the boundary of Site 4. Cabling planned to go under the tributaries in at least two locations including on CRC4.

Current, though limited, research suggests that electromagnetic fields can affect the nervous system of crayfish, potentially altering behavioural responses. Further study is needed to understand the long-term, low-level effects of these fields on the survival, behaviour, and reproduction of the white-clawed crayfish, especially as they are considered a "globally endangered" species.

Chapter 18: Other Environmental Matters

18.1 Utilities

Site 4 has multiple Utilities running along the boundary edges, through the sites as well as overhead. These have not been assessed adequately by East Pye Solar.

Water and sewage pipes

Sites 4A and 4B have specific geological and environmental factors that influence their potential impact on water and sewage:

Identified constraints:

East Pye Solar

- **Groundwater & Aquifers:**
 - **Site 4A:** The northern end of sub-site 4A contains Leet Hill Sand and Gravel. These are classified by the Environment Agency as **Secondary A Aquifers**, meaning they are permeable layers capable of supporting local water;
 - **Saturated Soils:** Preliminary reports indicate that sub-alluvial gravels in this area are typically saturated and may require "wet working" during construction.
 - The northern end of Site 4A is where the construction and holding compound is now to be located
- **Contamination Risks & Historical Land Use:** nsip-documents.planninginspectorate.gov.uk
 - **Site 4A:** There is a former landfill (Thorn Wood) located approximately 330m north of this sub-site that previously accepted inert waste.
 - **Site 4B:** A landfill site off the B1135, which historically handled commercial and gas control waste, is situated about 900m east of sub-site 4B. These locations are being monitored for potential contamination that could affect the local water environment.
- **Source Protection Zones (SPZ):** The majority of the broader project area, including Site 4, is located within a **Source Protection Zone 3 (Total Catchment)**. This means any pollutants introduced here could eventually reach groundwater abstraction points used for drinking water. nsip-documents.planninginspectorate.gov.uk
- **Sewerage Infrastructure:** A sewage works has been identified as a "Potential Source of Contamination" (PSC4) in the vicinity of Site 4 and Site 5. The developers are consulting with Anglian Water to ensure that solar infrastructure does not interfere with these existing services. nsip-documents.planninginspectorate.gov.uk
- **Surface Water Management:** Site 4 is subject to an Outline Surface Water Management Plan to prevent increased runoff from solar panels from overwhelming local drainage systems and causing flooding.

Water

The East Pye Solar project poses a significant and unacceptable risk to water pipes and the general water infrastructure through:

- Ground pressure and pipe damage
- Trenching and accidental strikes
- Soil compaction and hydrological change
- pollution and sediment infiltration
- Long term operational disturbance
- cumulative development pressures
- flooding
- pollution to private water supplies
- pollution to natural water environments

These risks conflict with **NPPF** regarding consideration of water in planning decisions:

- **Flood Risk (CORE FOCUS) -**
 - 2021 flooding in Long Stratton along the A140;
 - Annual flooding of the properties near Star Lane;
 - subsequent homes flooded following significant rainfall;
 - Runoff will increase surface water and risk of flooding on an area already susceptible to flooding;
 - Long Stratton is in a dip with surface water running down hill to the Conservation Area and local properties;
- **Sustainable Drainage Systems -**
 - to manage surface runoff,
 - mimic natural drainage
 - provide environmental and biodiversity benefits not pollute the nature ponds already on site 4A and water course on site 4B
- **Water Quality Protection**
 - prevent development from polluting rivers - **river Tas**, lakes, ponds and groundwater
 - prevent pollution of private water supplies. East Pye Solar has failed to survey
- **Natural Environment and Catchments**
 - planning should support protection and enhancements of water-related ecosystems - **river Tas and tributaries**

Glass Fibre Broadband

In the Long Stratton and Tasburgh area, buried fibre optic infrastructure is primarily to be found along the following key roads near:

Sites 4A and 4B:

- **A140 (Ipswich Road)**: This is the primary north-south utility corridor connecting Long Stratton to Norwich. Openreach has established agreements to provide full-fibre (FTTP) to all new developments along this stretch;
- **New Long Stratton Bypass Route**: Construction of the bypass (started in 2024) involved significant utility diversions; new fibre is laid alongside such major road projects to "future-proof" the area and in line with the Long Stratton Neighbourhood Plan to build 1800 new homes.

Potential Effects on Fibre Infrastructure

While the **East Pye Solar Project** will not interfere with the *signal* (fibre is immune to electrical interference), it presents physical risks to these specific areas:

- **Cable Route Corridor (CRC) Crossings**: The project includes a "Cable Route Corridor" designed to link the various solar sites. These high-voltage internal cables need to cross the A140 and the many other lanes on CRC4, there is a risk of **accidental cable strikes** on existing buried fibre. East Pye Solar
- **Construction Traffic & Roadworks**: Heavy vehicle access for Site 4A (north of Long Stratton) may require road widening or temporary access points. Excavation at these points can damage "microducts"—the thin plastic tubes that house fibre cables—which are often buried at shallower depths than older copper lines.
- **Wayleave and Access Issues**: Large-scale infrastructure on Sites 4A and 4B could potentially complicate future maintenance access for broadband providers if their existing lines pass through land now designated for the 60-year solar scheme. Broadland and South Norfolk

Satellite Connection

With limited Broadband connectivity, rural communities rely on satellite services like Starlink. Many mobile phone providers are now abandoning new masts due to the long planning process and offering back up services via Satellite.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite broadband services operating in Ku- and Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.

Gas pipes

There is both a **high-pressure national transmission** supply running from Bacton on the North Norfolk coast and crosses East Pye Solar site 5 plus a **local distribution network** in the Long

Stratton and Tasburgh area, both of which are physically near or within the boundaries of **Sites 4A and 4B** of the East Pye Solar project.

Gas Supply Types and Locations

- **National Transmission System (NTS):** A major high-pressure gas corridor passes through South Norfolk, carrying gas from the Bacton Gas Terminal to the rest of the UK. National Gas Transmission route is present in the Long Stratton vicinity and within 100m of the CRC4 at Mill Road;
- **Local Distribution (Mains Gas):** Cadent Gas operates the local network that serves homes and businesses in Long Stratton and Tasburgh village centres. While the solar sites are on agricultural land, the Norwich Road, which bisects Sites 4A and 4B, is a common route for these buried local pipes. National Gas

Proximity to Sites 4A & 4B

Sites 4A and 4B are situated **north of Long Stratton and south of Tasburgh**, on either side of the A140 (Norwich Road).

East Pye Solar

- **Site 4A (West of Norwich Road):** This site borders the rural fringe of Tasburgh where local gas spurs may end.
- **Site 4B (East of Norwich Road):** This area is part of a wider "energy nexus" in South Norfolk, where multiple major utilities (including gas and the **400kV overhead line**) converge. nsip-documents.planninginspectorate.gov.uk

Mobile Phone Signal

Large scale solar can affect mobile phone signal. As rural phone signals are limited compared to towns and cities, any detrimental effect can be significant.

Solar panels can:

- Reflect or scatter radio signals (including 4g/5g)
- Create 'shadowing' effects behind large arrays
- Slightly weaken signal strength at ground level within or immediately behind a site.

As the panels are 4.5m high and tracking, the cumulative impact of the scheme across the whole area, often near to homes and PRow, signals could be weakened and the effect significant in places where signal is an issue already.

Inverters and electrical equipment:

Solar fields include inverters and transformers which can emit electromagnetic interference if poorly shielded.

Although the risk is low impact it relies on developers to be compliant with regulations and evidence is based on small solar arrays not mega developments. This has not been assessed.

Blocking Line-of-Sight:

Mobile phone signals rely partly on line-of-sight to masts, especially for 4G/5G.

A solar development could affect this if it:

- Sits between a user and a nearby mast
- includes ancillary structures (substations, security fencing, CCTV poles)

East Pye Solar has multiple substations including a 132kV one on site 4B and another 400kV one on site 5A.

In addition to this, the arrays are tracking panels that move, will be surrounded by fencing and CCTV. Rural signals can already be intermittent and weak without additional interference.

The cumulative effect of this development could cause mobile signal issues across the area which has not been accessed by East Pye Solar.

18.2 Major Accidents

While specific accident counts for the **East Pye Solar Project** Sites 4A and 4B have not been officially aggregated in a single public "accident log" yet, recent data and local records for the surrounding **A140 corridor** (where these sites are located) show a high frequency of incidents:

- **A140 Corridor Statistics:** In the most recent full reporting year for South Norfolk, the A140 saw **nine collisions** in a single stretch. Six of these occurred between Long Stratton and the Scole bypass, with three more further north near Swainsthorpe;
- **Recent Notable Accidents:** EDP24
 - **January 2026:** A "multi-vehicle" crash occurred on the **A140 Long Stratton Bypass**, requiring response from police, ambulance, and fire crews and the bypass closed for most of the day;
 - **July 2024:** A significant collision between a lorry and a car between **Tasburgh and Newton Flotman** resulted in an overturned lorry and 45-minute delays.
 - **March 2026:** A crash on the A140 near Diss required four fire crews (including one from Long Stratton) and an **air ambulance**.
- **Safety Rating:** The Department for Transport (DfT) has identified the **A140** as one of the most accident-prone roads in Norfolk, with nearly 10% of the county's serious and fatal accidents occurring on this route and the A47;
- **Site 4A & 4B Specifics:** located on the northern boundary of Long Stratton and the main route to and from Norwich and Ipswich. The site butts up to the Hempnall roundabout that serves in excess of 20000 vehicles daily. With the planned addition of

a 5th access/exit point, A19, to serve the construction compound and holding site, the increase in accident risk has to be considered.

Likely Effects on Accidents and Major Accidents (Sites 4A and B)

- **No Significant Residual Effects Expected:** The scoping report indicates that no significant residual effects on major accidents and disasters are expected during the construction of the overall scheme, which encompasses the 4A and 4B areas.

However this failed to include:

- the newly opened **Long Stratton by-pass** which has seen an increase in vehicle traffic through the Hempnall roundabout as a result of sat navs now directing vehicles to the quickest route and **hasn't been surveyed since it opened August 2025;**
- **Increase in construction traffic** on small rural roads where drivers are unfamiliar with road layout;
- the Long Stratton Neighbourhood Plan with the **increase in housing**, 600 already being built and ready for sale within 100m of site;
- Construction traffic crossing the B1527 to access A20 at site 4B;
- no assessment of traffic at Brick Kiln Lane serving businesses and local residents;
- Additional access point A19 at site 4A to include construction traffic and a holding site;
- proximity to other sites;
- cumulative impact on the A140 which is used to access many sites across the scheme;
- **Construction Risks (2025–2027):** Potential risks identified for the general development include those associated with construction traffic, temporary storage of materials, and accidental spillage of fuel or oil during on-site activities. [nsip-documents.planninginspectorate.gov.](https://documents.planninginspectorate.gov.uk/)

18.3 Glint and Glare

Introduction

Glint and Glare refers to the reflection of light bouncing off the solar arrays as the sun hits them at a specific angle.

With the cumulative effect of the arrays, which will be visible across the area from most places, this could be significant in particular when the topography of the landscape is relatively flat with slight undulation like it is in this part of South Norfolk.

Sites near roads and homes will have greater impact.

Effects (Glint & Glare) Air Fields

Site 4 sits within the radius of many busy local airfields within a short distance, including Hardwick Airfield at 3 miles, Tibbenham Airstrip at 5.5 miles, Seething Airfield at 6.5 miles and Old Buckenham Aerodrome (which hosts a large annual air show with the Red Arrows in regular attendance) at 9.5 miles.

There is also a small private airfield on the western boundary of Long Stratton that acts often as a personal, farm-based airstrip used for light aircraft, with occasional helicopter activity.

Site 4 sits under the approach path for Norwich International Airport with numerous large passenger flights seen daily above.

The East Anglia Air Ambulance is regularly seen flying to and from Norfolk and Norwich University Hospital.

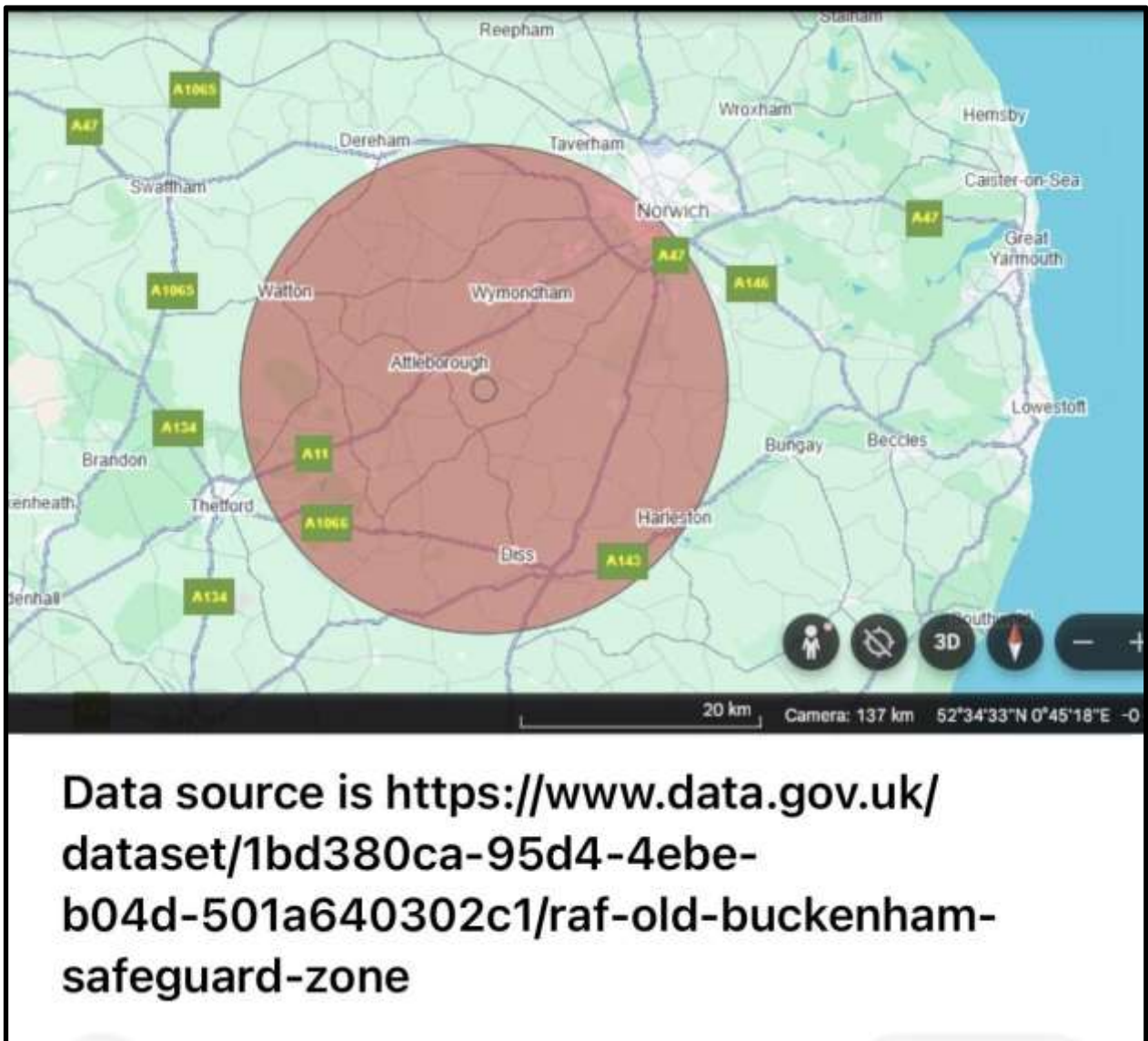
The air space above Site 4, and in fact in the skies above the rest of the East Pye Solar proposal, is used on an almost daily basis by the Royal Air Force and the American Air Force for training including jets and very low flying large aircraft. It is commonplace to have 'dog fights' above the villages of Long Stratton and Stratton St Michael and the 'glint' and 'glare' caused by the reflection of the sun on the solar panels, could cause serious safety issues especially in the cumulative impact of the scheme.

Well documented research highlights the vulnerability of aviation to 'glint' and 'glare' as they can cause temporary visual impairment for pilots, with the risks being more acute during low-altitude flights segments such as approach and departure, when pilots must maintain precise visual awareness. This is clearly a major issue in this part of South Norfolk with the amount of small airfields in close proximity.

It is strongly felt that a robust Glint and Glare Assessment is completed covering the following: -

- 1. Solar Position Modelling:** Annual and diurnal sun paths to determine potential reflection windows.
- 2. Receptor Mapping:** Identification of all sensitive aviation receptors.
- 3. Geometric Visibility Analysis:** Determining whether reflected rays intersect pilot sightlines.
- 4. Intensity Estimation:** Assessing whether reflections exceed daylight luminance levels likely to cause discomfort or disability glare.
- 5. Duration and Timing:** Identifying when and how long glint or glare would be experienced during operational periods.

6. Cumulative Impact: Where applicable, assessing multiple solar PV developments in the same airspace.



Roads Users

Glint and glare may reduce a driver's vision of the road if reflections occur even fleetingly or simply distract the driver, as is happening on the A140 at Mulbarton with Bloys Grove, as the eye is drawn away from the road with the peripheral vision picking up the glint off the panels.



Bloys Grove, Mulbarton (whilst still in construction), taken at approx 5.40pm in March with glimpses of sun through light cloud from the A140 from over 1km away

Site 4 straddles the A140 where 4.5m high tracking panels will be placed. The panels will be moving east to west and posts will be north to south. As the A140 runs slightly off centre from north to south. The panels will be facing parts of roads close to the Hempnall roundabout at some point during the morning and evening when the panels are most upright.

The developer's glint and glare assessment found that there were significant adverse effects yet concluded that significant adverse effects are not expected after mitigation.

The receptors were residents of nearby farms and houses, users of local roads surrounding the site parcel, users of local footpaths crossing or adjacent to the site.

Did they consider glint and glare from upstairs window especially the Cedars that is a residential property on at least 2 floors and has views across front and back, site 4A and site 4B?

Did they consider views from double decker buses and HGV or vehicles with higher cab height?

Mitigation alone will not screen the panels for at least 15 years and landscaping will itself change the character of the area from openness to enclosure.

The Hall Farm solar scheme can be seen over 1 kilometre away at Brick Kiln Lane even on a misty January afternoon at low light, and glint and glare is noticeable when trees are without leaves including when driving towards the Hempnall roundabout on the B1527. Hall Farm are low level fixed panels facing south.



Hall Farm Solar visible on a misty, wet day in January from over a kilometre away.





Hall Farm Solar May 2026 at 8.22pm

Homes

Extended periods of glare towards living spaces within a home may cause a nuisance for residents and could negatively impact residential amenity. Terrain heights are important to consider as Sub-site 4A slightly elevates at the southern boundary closest to the curtilage of the Cedars.

East Pye Solar has not given any consideration of Glint and Glare to properties from an upstairs window. The Cedars is a property on 3 floors with windows at the front looking west across to Sub-site 4A, 100m away.

As site 4 is within 100m of some properties on the Norwich Road, Church Lane, Brand's Lane and Brick Kiln Lane on an open terrain and relatively flat topography, reflection will be an issue.

Current landscaping can not mitigate against the reflections as currently these homes have open views across the countryside and with panels standing 4.5m high, any additional landscaping will take 15 years to mature and will be useless when leaves aren't on trees.

Solar Reflections: Initial scoping reports identify that solar reflections (glint and glare) may be visible to road users and properties on sections of both the **A140 and B1527**, which will require mitigation (such as screening) to ensure driver safety. nsip-documents.planninginspectorate.gov.uk

Mitigation will itself change the character of the area from openness to enclosure.

Chapter 19: Cumulative and In-Combination Effects

East Anglia energy usage is one of the dirtiest in the UK yet is a major producer already of renewable energy.

East Anglia is already achieving and exceeding regional targets for renewable energy, as acknowledged by East Pye Solar, however East Anglia is not benefiting.

The region is already a **manufacturing energy plant for other regions whilst the regional consumption is 'dirty' energy.**

The local Grid is almost at capacity with no plans for being updated.

The NESO app shows that the East England region has its main source of energy as solar during main daylight hours.

But **the carbon intensity is one of the highest in the country.** In fact **East England is generally 13th out of 14** regions with only South Wales showing as consistently worse and their production is mainly gas! Even London is significantly better yet is mainly 'imports' and gas.

Even with the vast amount of off-shore wind visible from the beaches all along the Norfolk coastline, there is almost no local impact as the East England wind percentage is negligible unless the wind is blowing. Wind then offers low carbon intensity and is effective during nighttime hours too (when it's blowing).

Regional carbon intensity in the NESO app is not determined only by the percentage of renewables generated within that region. It is based on the **electricity actually being consumed** in that region at that moment, including power flowing across transmission boundaries and from interconnectors.

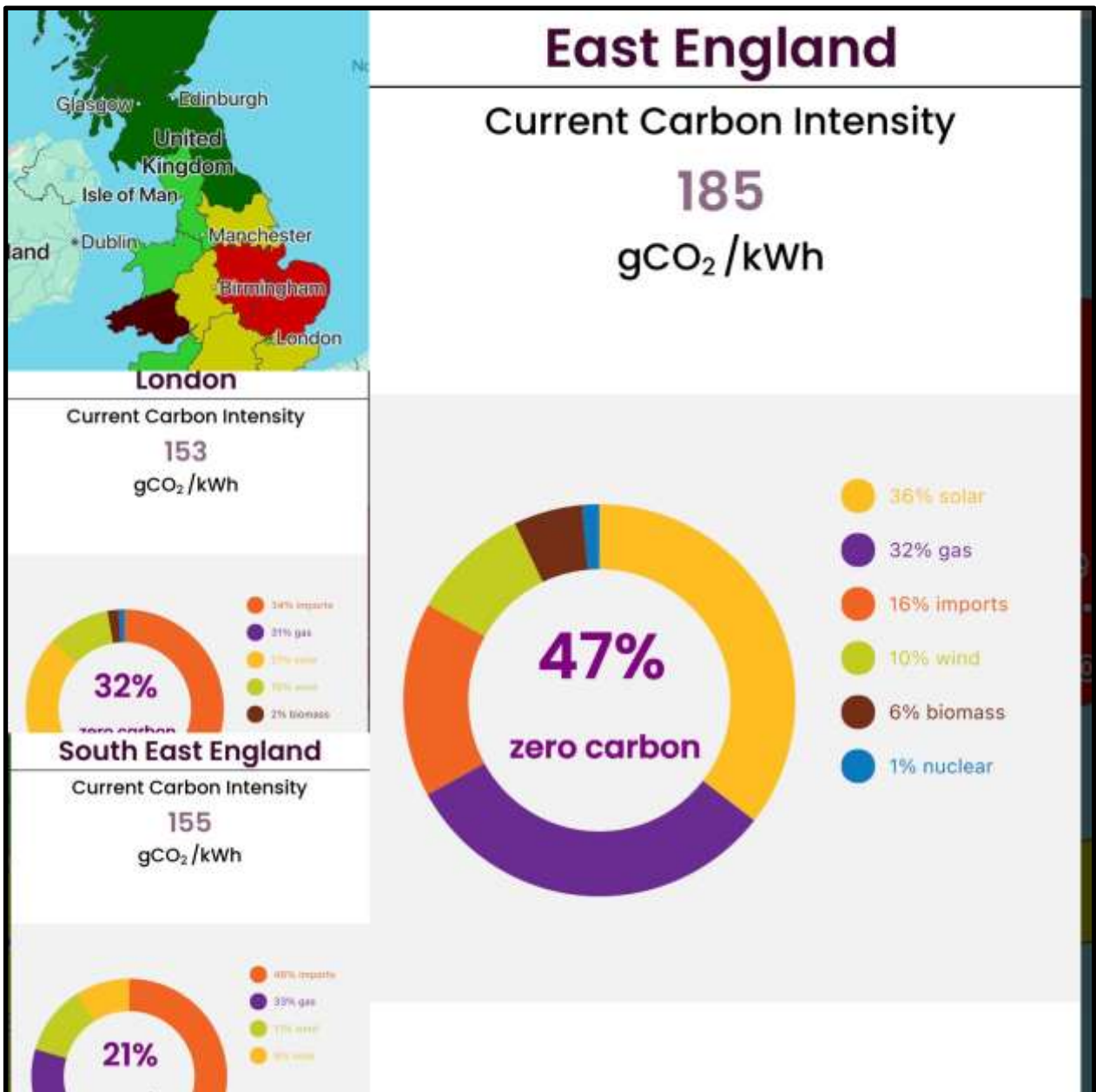
For example, East England solar was at 48% at 2.45pm on a sunny June afternoon, the East England was importing 25% of its electricity but imports aren't necessarily low carbon.

The electricity could be generated by:

- gas stations elsewhere in Britain;
- imports arriving through interconnectors from continental Europe;
- power from regions with higher fossil fuel generation.

So where is our solar renewable production going?

Solar output does not displace gas locally and considering the above snap shot, East Anglia was producing a lot of solar power. However, this region is also a major transmission corridor carrying power southwards towards London and the South East which would explain why their carbon intensity is always much lower and their biggest supply is 'Imports'.



This is from NESO app at 4pm 1st July 2026

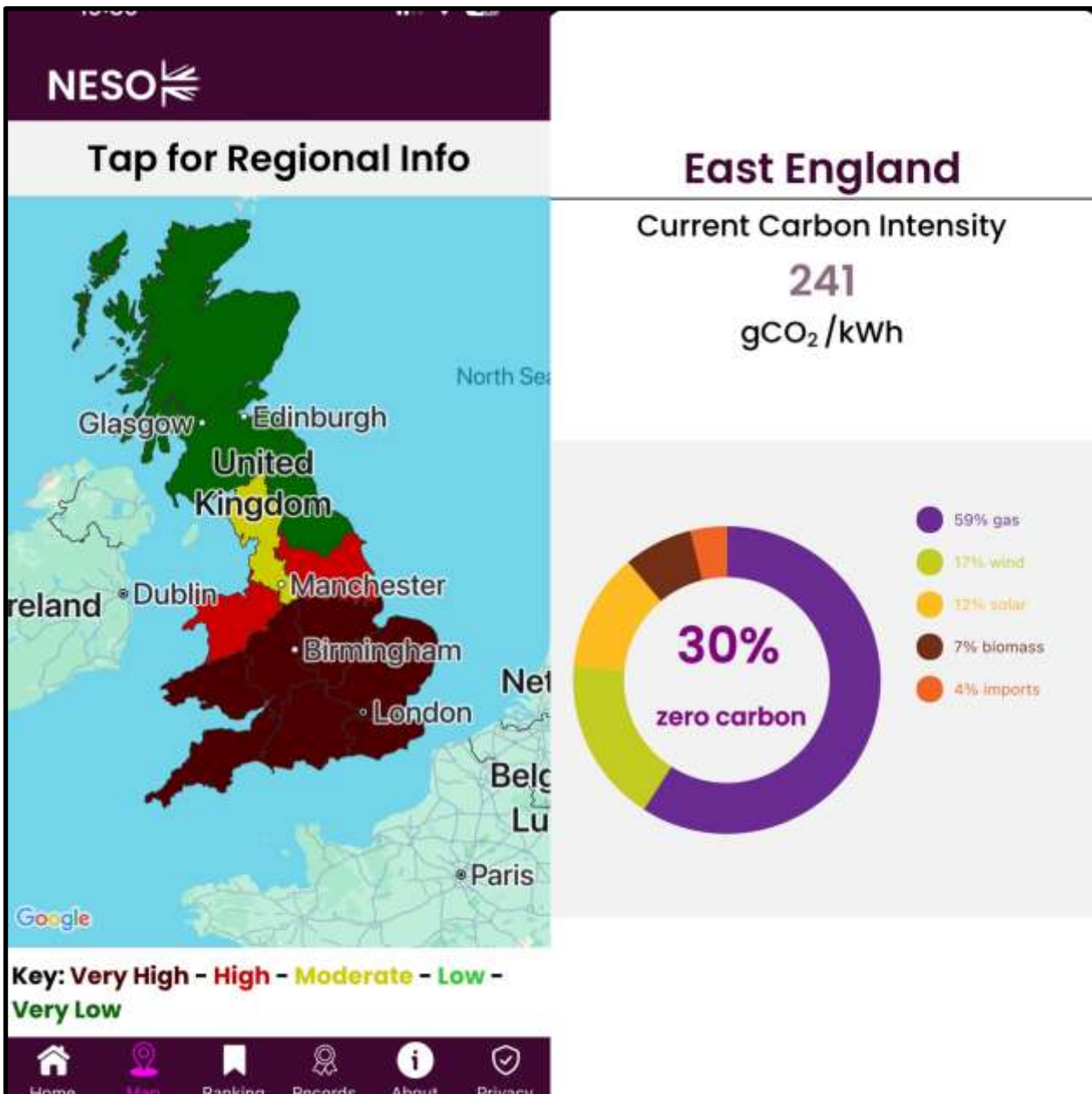
The solar generated in East Anglia does not generally stay there as the grid cannot cope with the fluctuations so it will have been **exported** to neighbouring regions. Meanwhile, electricity flowing **into** the region from elsewhere could have a **higher carbon content**.

Carbon intensity is heavily influenced by marginal generation in the UK grid and therefore will reflect the marginal generator that is adjusting the output to balance supply and demand. That will be gas.

If the East England demand input were met by gas elsewhere on the system, the regional carbon intensity will remain relatively high despite the abundant local solar generation.

If generation in East Anglia grows faster than transmission capacity or demand, the increase in the amount of solar output via East Pye Solar (as well as other projects across the region) will be constrained or curtailed during sunny periods.

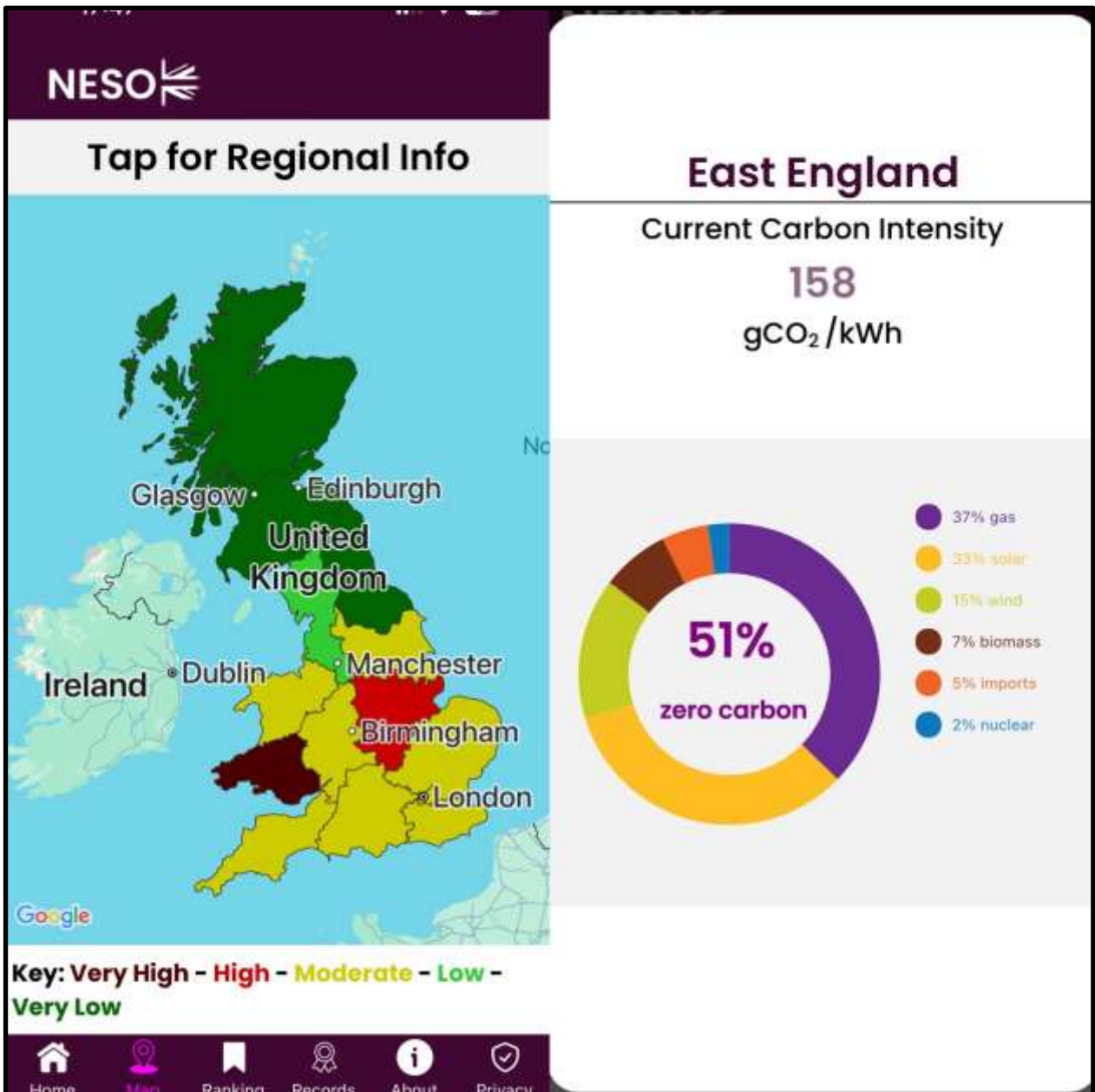
On 30th June the southern UK was mainly using gas even when the sun was shining.



NESO 30th June

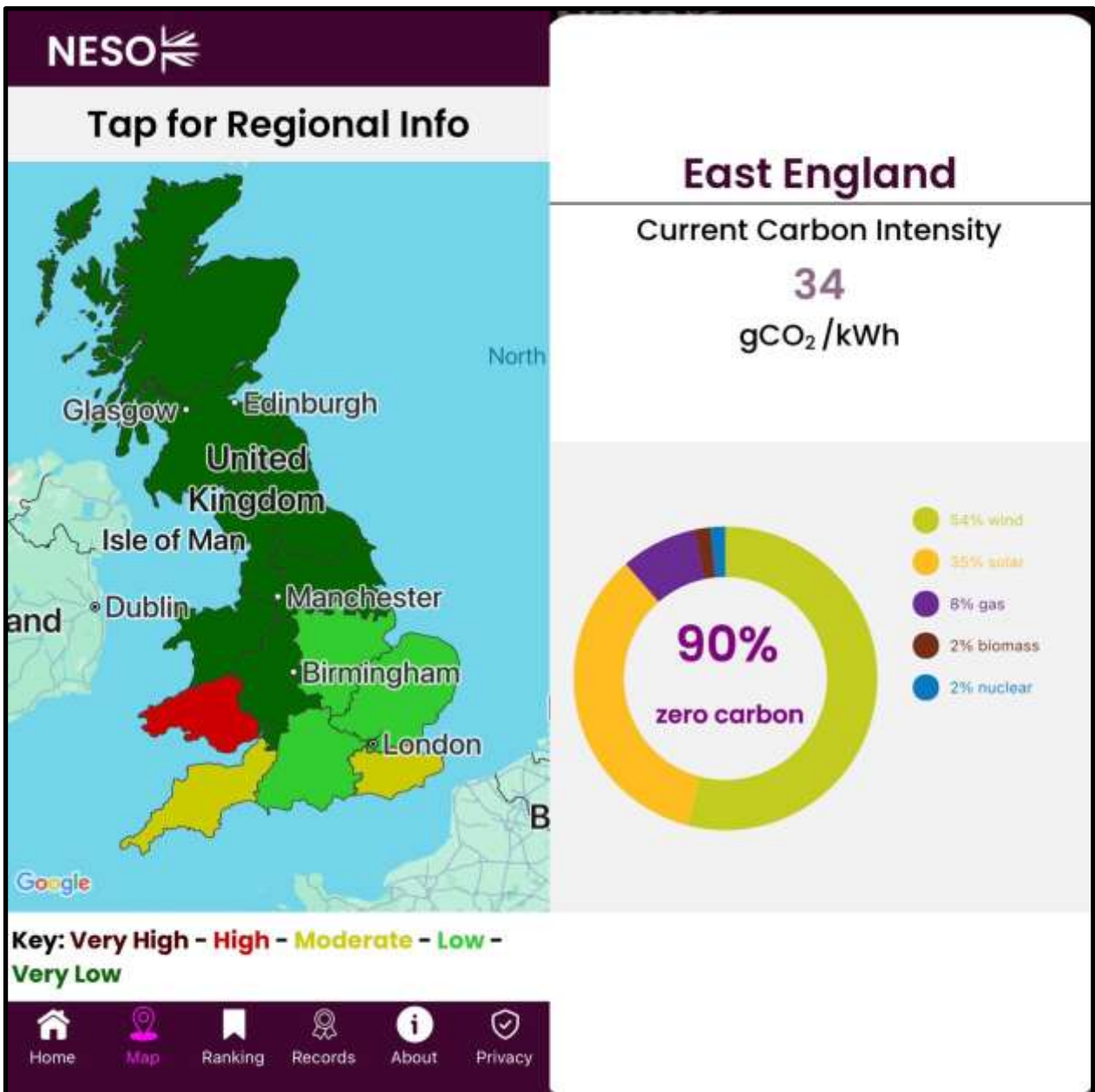
If solar is frequently curtailed because transmission lines are full, the carbon benefit per installed MW becomes lower than if the same project were built in an area with spare network capacity.

Interestingly, the lowest East England carbon intensity for nearly a week was at 5.30pm on 1st July when the main supply was gas.



NESO 1st July 5.30pm

However it's interesting to see the next morning, 2nd July, when East Anglia was very windy and what happens to the carbon intensity in the region. That's because our transmission system is designed to carry off shore wind and not solar.



East England, 2nd July 2026 10.35am

So the question is, is East Anglia the right place for another large solar factory or should the next best investment in East Anglia be grid reinforcement and further local offshore wind connections?

East Anglia is being proposed as a renewable energy park across the region with multiple Solar renewable NSIPs of similar size to East Pye Solar, like prospectors in the gold rush. The devastation this will bring will change this quiet, rural county, that is hugely agricultural, into an industrialised energy factory.

This will destroy the regional tourist industry, the county's largest economic sector bringing in £5.9 billion (including Suffolk) and supporting 54,000 jobs.

The sheer scale of this speculative project would transform this working rural environment into an industrial landscape.

81% of proposed parcels of land are designated BMV Grade 1-3a that have been farmed for hundreds of years and would continue to be so, if not used for renewable energy.

The area contains, and is surrounded by many important archeological sites, historical monuments, listed properties and historic places of worship as well as significant landscape character and protected wildlife habitats.

The destruction and fencing off land will have a terrible and profound impact on all species of wildlife. Included in this are many protected species which cannot be mitigated against.

The Cable Route Corridor will cause destruction and deprivation to many farming businesses through the 2 year construction phase, and beyond, as the soil will take years to recover from bund storage.

The landowners involved in the acquisition of rights for cabling have received little consultation, structured information to make an informed decision, have been pressured, threatened and bullied to sign contracts even though plans for the cabling are not complete nor thorough. Additionally, East Pye Solar have not explored alternative routes to avoid farmland; the routes are dissecting fields diagonally or straight down the middle to incorporate the shortest or most convenient location to East Pye Solar, without considering impact to landowners involved and expanded the corridor from 20m to 50m.

The negative impact to multiple landowners not voluntarily involved to benefit the private profit of 9 landowners and Island Green Power.

The Scheme is disconnected, not just from site to site, but from north to south.

The total of the scheme's cabling is 24 km but Cable Route Corridor 4 is 8km long, a third of that total. This demonstrates the disconnect of the southern 'cluster' Sites 1,2, and 3 as well as the infrastructure of the BESS, Substations and National Grid transmission substation at Great Moulton, to most energy producing Sites in the north.

The choice of location for this Scheme is landowner-led and 'the Scheme tries to reshape the landscape to suit the scheme and not create a scheme that fits the landscape' Norfolk Wildlife Trust.

That is not a good enough reason.

19.1 Other near-by developments (solar, housing, energy infrastructure)

Long Stratton is undergoing major expansion, planned for at least 1,800 to 1,875 new homes, 12 hectares of employment land, a school and community area starting with the new eastern bypass as part of the Long Stratton Neighbourhood Plan 2019-2036 (adopted) , transforming the village into a small town. Major developments include 600 homes with a relief road west of the A140, and within a few hundred meters of Sub-site 4A, as well as a large eastern development comprising 1,275 homes, a school, and business space.

Key Details on Long Stratton Developments:

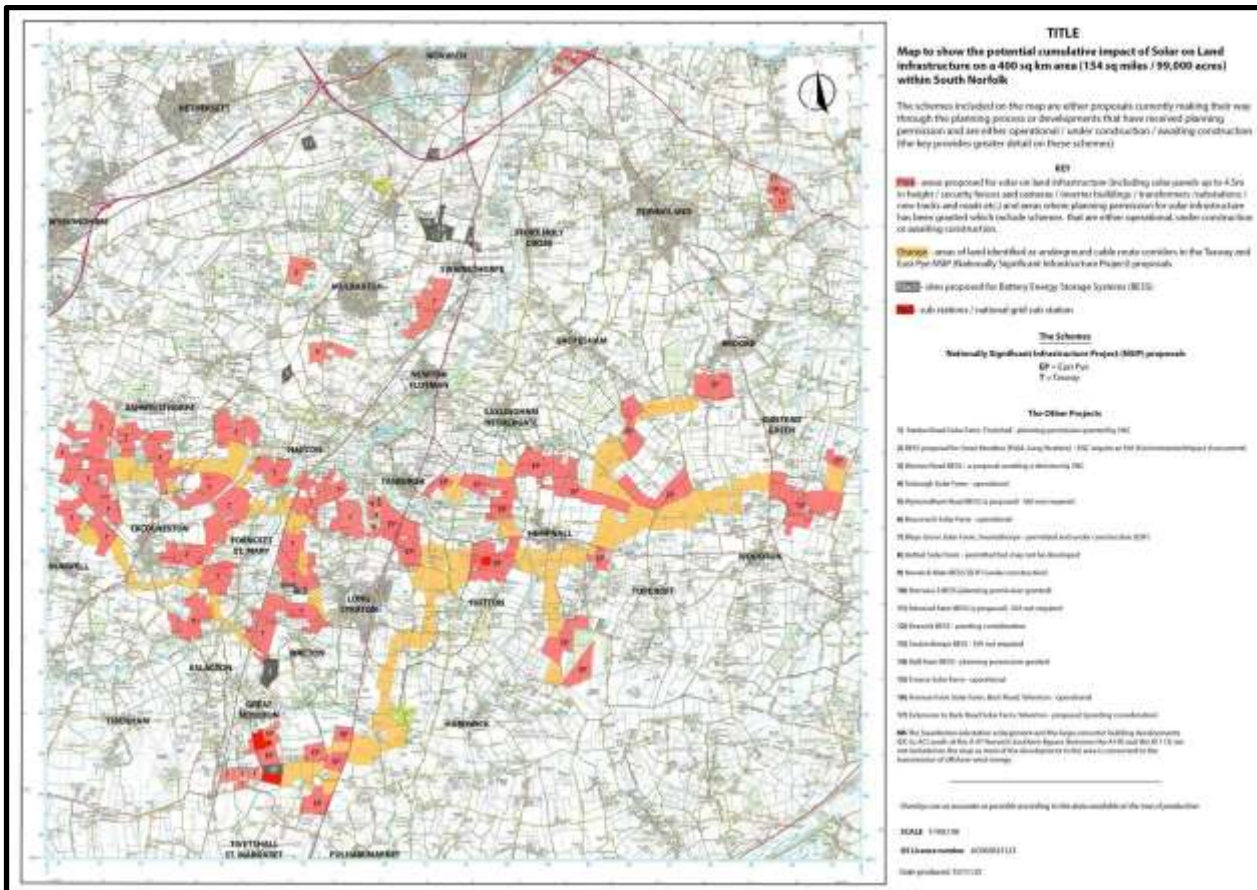
- **Total Housing:** A minimum of 1,800–1,875 new homes are planned to be built, effectively doubling the size of the village.
- **Bypass Construction:** A 3.9km (2.5-mile) long-awaited bypass on the eastern side was completed in 2025 and moves traffic on the A140 away from the centre of Long Stratton.
- **Infrastructure:** Along with the bypass and homes, plans include a new school, commercial/business opportunities, improved, expanded services, and community facilities to support the increased population. All falling within the boundaries of the bypass to avoid sprawl and to maintain containment to the rural settlement.

The developments are largely guided by the Long Stratton Area Action Plan and the Greater Norwich Local Plan (GNLP) to transition the settlement into a self-sustaining town.

Other Solar Schemes in operation or in planning:

- **Bloys Grove** (50MW) is 200 acres and located approximately 3km north of East Pye Solar in **Mulbarton** and is providing 15% Network Rail's annual non-traction electricity demand (stations, offices, depots and maintenance facilities rather than train traction power). Developed by EDF Renewables.
- **Bloys Grove 2** is now in consultation to expand to another 200 acres on BMV 2 land also bordering the River Tas and within a Flood Zone 3
- **Swainesthorpe BESS** - EDF Renewables 114MW located between Dunstan and Swainesthorpe near Bloys Grove
- **Hall Farm Solar, Tasburgh** butts up to East Pye Solar, Plot 4A on the west boundary and is a 15MW solar infrastructure acquired by BlackRock from SPI China in 2016. It covers approximately 74 acres and was connected to the grid in 2015. It has a licence for 20 years.
- **Tasway Solar** - a 3200 acres proposal which is currently paused with a Gate 1 connection and waiting to see the outcome of East Pye Solar.

Tasway plans to use East Pye Solar infrastructure even though East Pye state their infrastructure is for themselves alone. Tasway will meet East Pye Solar to the east of Hall Farm Solar if consent is given. This will give a cumulative impact of in excess of 6000 acres of solar plus cabling across approx 65 square kilometres of South Norfolk, east to west. That is the same size as Greater London.



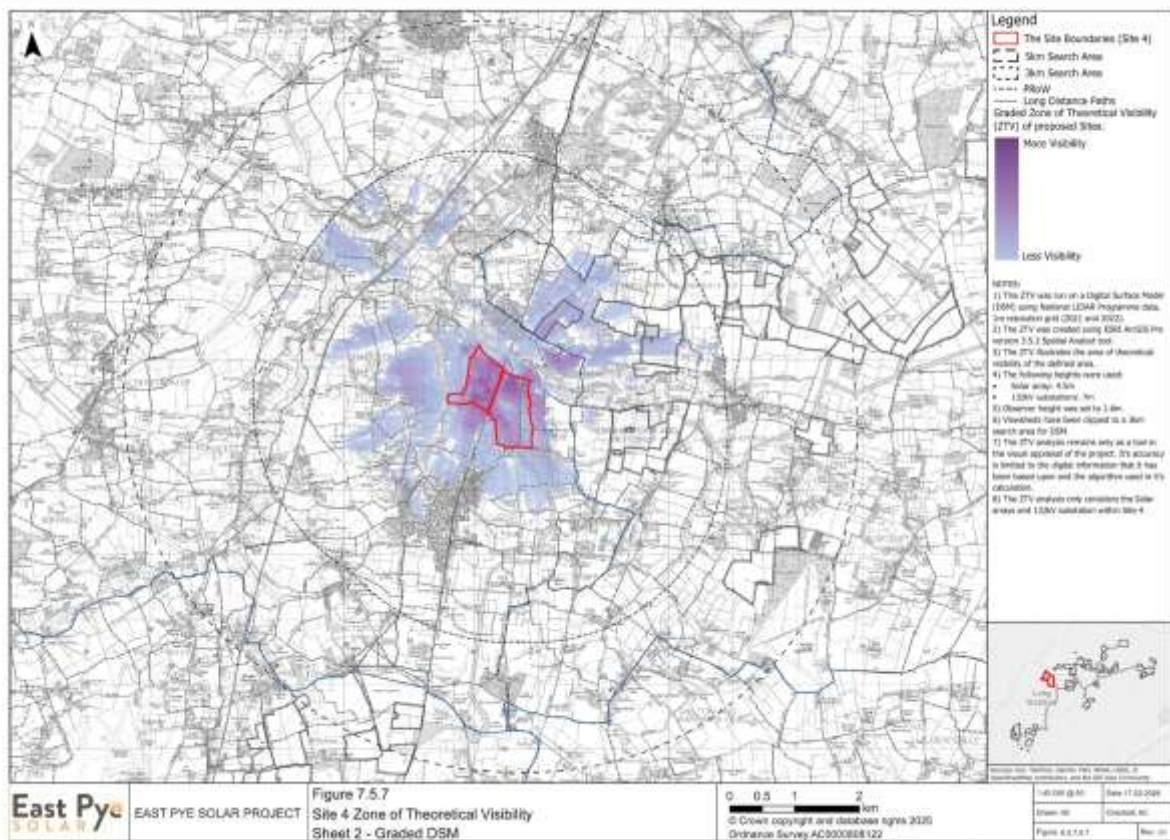
- **The Drove - NSIP** Island Green Power 500MW in Mid Norfolk and DCO with the PINS
- **High Grove Solar - NSIP** 500MW in planning
- **EcoPower Suffolk Solar - NSIP** 250MW, 2,200acres, consultation stage
- **Gissing solar project—NSIP** is currently in its early exploration stages and is expected to be the **largest solar farm in the UK** if it proceeds.
 - **Generation Capacity: 900 megawatts (MW)**
 - **Physical Acreage: 5,000 acres** (approximately 2,020 hectares).
 - **General Location:** land between **Long Stratton** and **Diss** in South Norfolk.
 - **Developers:** The project is being explored by **RPC (Renewable Power Capital)** and **Elmya Energy**.
- **Long Stratton Solar park - NSIP**, scoping across the region

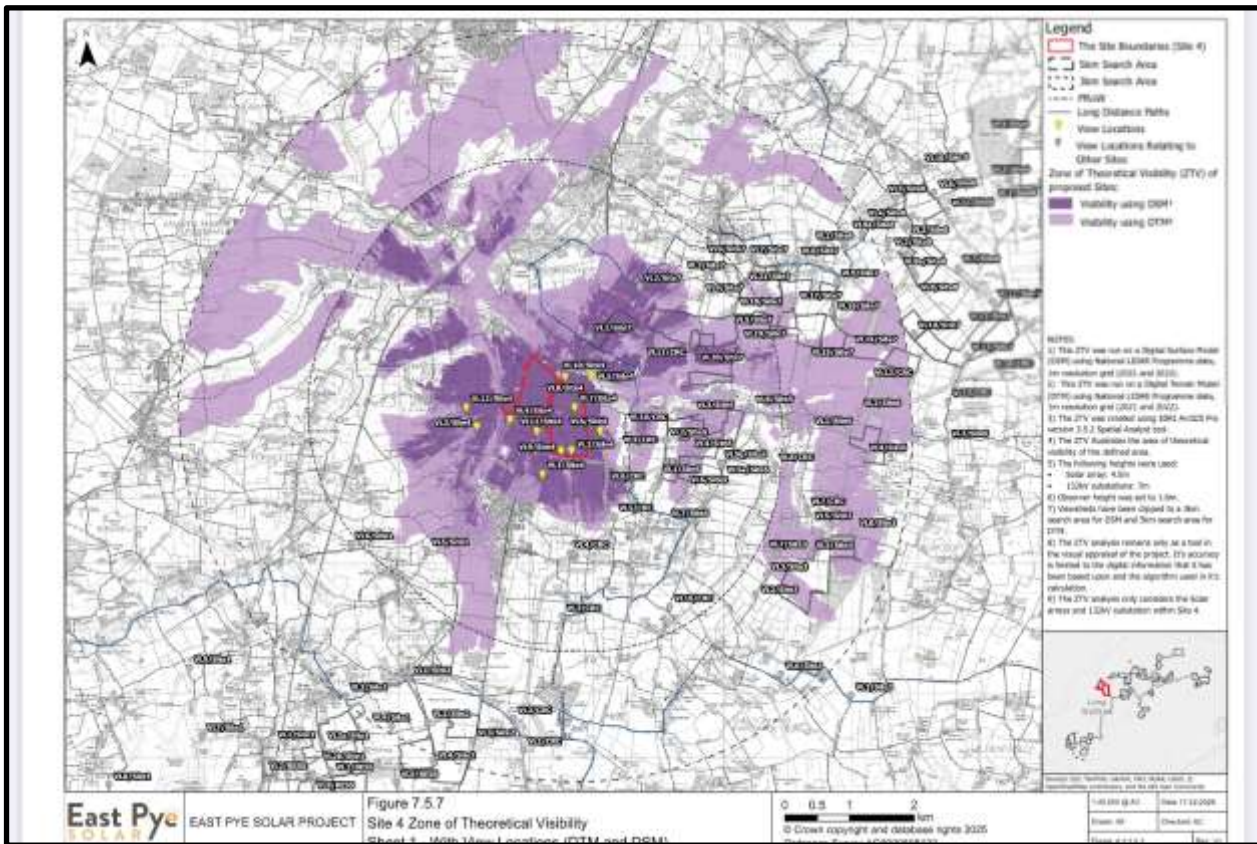
- **Trowse Solar Farm 1** - (or Trowse Newton Solar Park). Developed by Island Green Power and operational since 2016, has a capacity of 5MW and covers an area of 117 acres. It's located on the Norwich Southern Bypass
- **Trowse 2** is 7MW and has been operational since 2022 as an extension to Trowse 1
- **Dunston Battery Store** - or the **Electric Land BESS**. **Capacity:** Originally planned for **130MW**, the project was upgraded in March 2025 to a potential **255MW** capacity due to technological advances. **Location:** A **5.1-acre** site on Stoke Lane, directly adjacent to the Dunston Hall hotel and golf club, just off the **A140** south of Norwich near Swainesthorpe BESS.
- **Dickleburgh, South Norfolk** - 49.9MW on 182 acres near Pulham Market, consultation stage
- **Long Stratton BESS, South Norfolk** - 700m west of Long Stratton, permission granted early 2026 but only has Gate 1 connection
- **Bracon Ash, South Norfolk** - 28.5MW
- **Grange Farm Solar, Palgrave, Suffolk** - 30MW
- **Marsh Lane Solar, Palgrave, Suffolk** - 30MW, 123 acres

19.2 Cumulative impact on landscape and visual

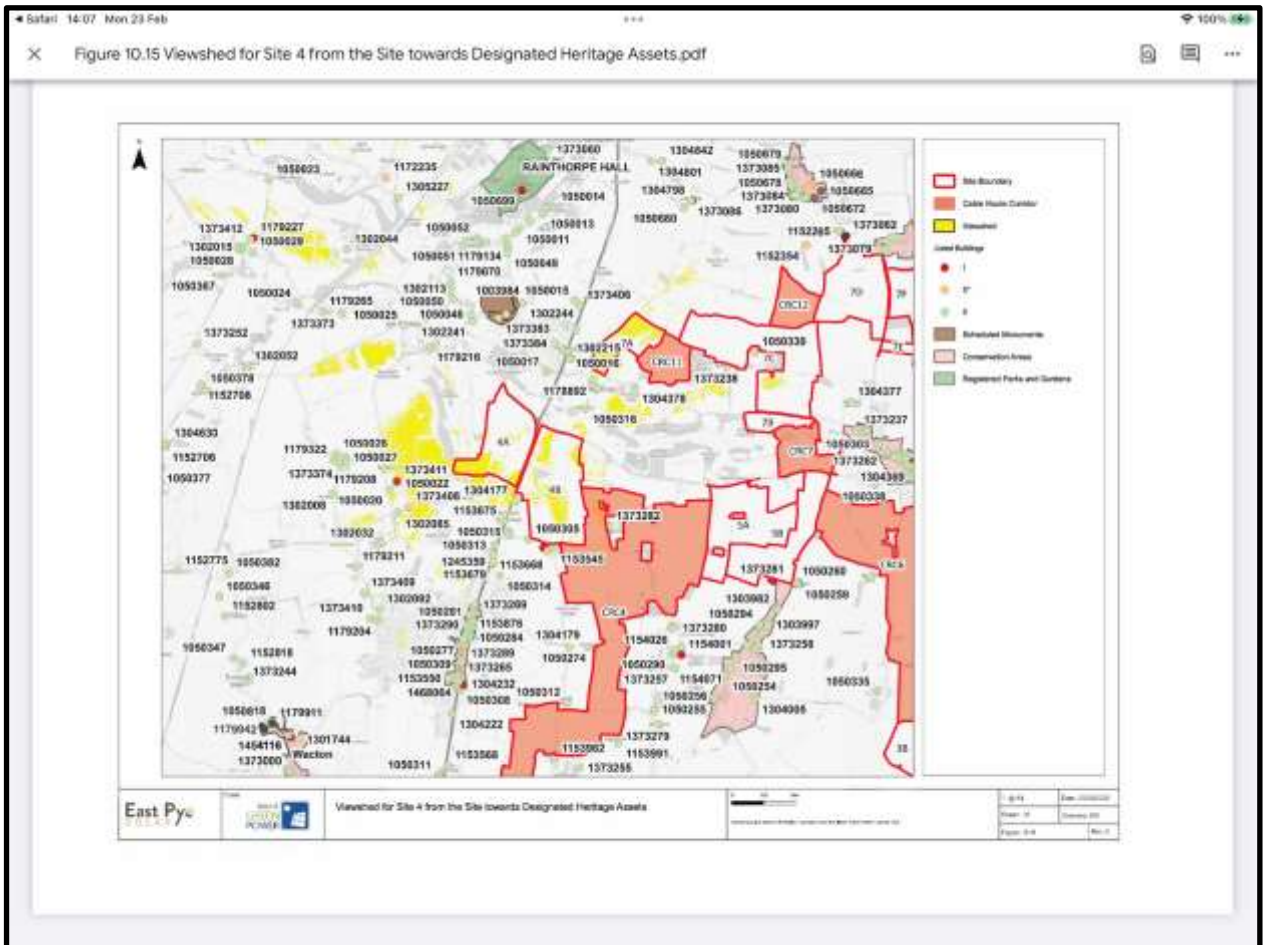
East Pye Solar's own diagrams show that the impact of the development on the surrounding landscape and the visibility is hugely detrimental not just to those in close proximity but to much further afield.

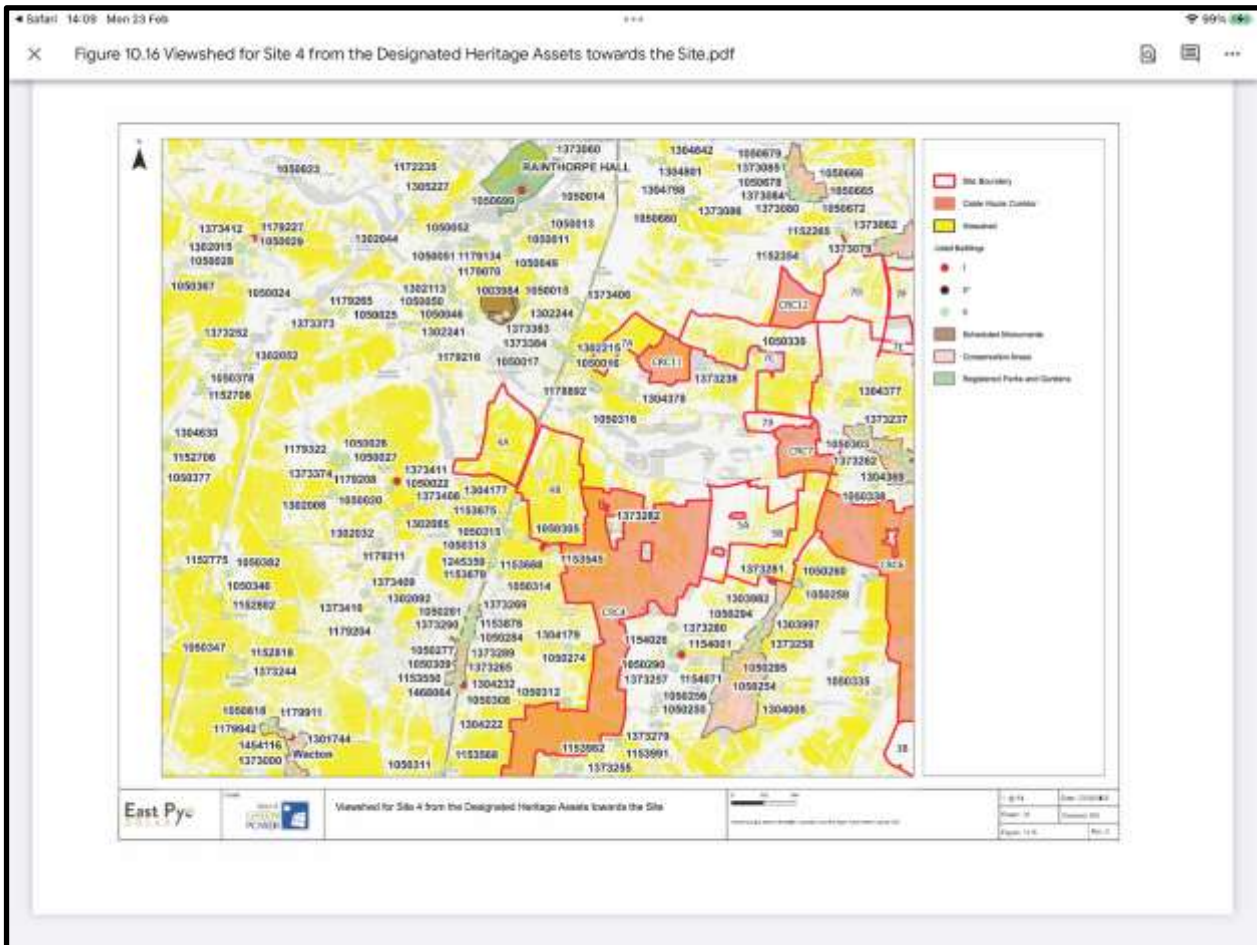
The maps only show up to 5km however we know that it doesn't just stop there. For example Bloys Grove, Mulbarton can be clearly seen from a road over 3km to the east of the scheme so we know it would be still visible from at least 5km away with the landscape allowing.





Site 4 will be visible from the Conservation Area of Long Stratton





Even now, the small Hall Farm solar infrastructure can be seen from at least a mile away including on a dull day. These panels are only 2m high and there is a tree line directly down the length of the east boundary. Yet with or without leaf the tree line makes no difference. On a sunny day this gives off glint and glare which is visible on the B1527.

Although the topography of the land may appear flat, it actually slightly undulates, which will make the scheme visible for miles across multiple villages.

The trees can't mask it as the panels will be taller than most existing mature trees whilst the ones planned to be planted as screening will take 15 yrs to mature.



Below shows Plot 4 (A and B), facing north, with plot 7 in the distance and the yellow areas being the cable routes.

With 4.5m panels and a 132kV substation planned next to Long Stratton FP3 there will be no horizon, sunrise or sunset for miles around.



The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to visual impact, and it cannot be adequately addressed by project-specific mitigation alone.

19.3 Cumulative impact on ecology

The current ecology surveys provided by East Pye Solar are not complete enough to allow full examination and further surveys are essential.

The information surrounding haul roads, compounds and road widening of narrow lanes is misleading in particular towards the impact on mature hedges and trees.

The Scheme represents a significant change to this landscape and its habitats by causing disruption and increasing fragmentation of Sites; none of which can be adequately mitigated for.

Lighting of compounds and construction sites, trenching works and increased vehicle movements, especially of heavy vehicles are of particular concern and spread across a wide swathe of the Claylands.

Lighting on compounds and for night working is in conflict with the need to protect this Dark Skies area. Dark Skies areas are shown to have a benefit for human health as well as wildlife.

The Claylands landscape is of high value for people and wildlife because it is a small-scale area of ancient countryside with pre-enclosure patterns of tall, old hedges, small wood and irregular fields.

East Pye Solar is out of scale with this initiate landscape and represents industrialisation of this very rural area. It is out of character and alien.

Redesigning the Claylands landscape, at scale, for solar industrialisation is not acceptable. A scheme should be designed to fit a landscape and bring a range of benefits for the people and wildlife that live in the area. It should not be to benefit private profit.

The South Norfolk Claylands has been the focus of nature conservation efforts specifically on the high occurrence of good quality habitat (ancient woodlands, open commons, mature hedges and trees) within the landscape.

This scheme carries unacceptable and long-term impact on ecology and on the rural landscape valued for its tranquility.

As the Scheme is not needed under UK Government Clean Energy Action Plan the impacts outweighs and benefits.

Removal of significant hedgerows and trees for access points, haul roads and to improve visibility is considered 'insignificant' across the documents. Replacing mature habitats with immature planting, that will take decades to grow as well as change the nature of the landscape itself. It is unacceptable and damaging to the natural ecology of the area.

The impacts need to be assessed as not just immediate loss of habitat in that place, but on how they are used as connectivity for species across the landscape. This latter point is a legal requirement within the Core Sustenance Zones for Barbestrelle bats and also needs to consider the Favourable Condition Status for both bats and hedgehogs.

Of special concern is the impact on Barbestrelle bats. The area lies within the Core Sustenance Zone of a number of interconnecting colonies (Norfolk Barbestrelle Study Group). Barbestrelle are especially prone to disruption from noise and lighting, and as it stands, the proposal gives grave concern for the bats' future in the landscape should the Scheme proceed.

It is worth noting that Barbestrelles are present because this is a quiet area of small woods, mature trees, open grasslands, ponds, hedgerows and minimal lighting or disturbance. A Natural England licence will be needed for work in the vicinity of the barbestrelle roosts identified by the Norfolk Barbestrelle Study Group, and this is not clear in the application as it stands.

The solar scheme impacts several County Wildlife Sites and Sites of Special Scientific Interest, including Crow Green, Wood Green and Tyrrel's Wood, Spring Wood, Krons Meadows plus Brooke-Saxlingham woodland cluster and sites along the Hempnall Beck. Local ecologists consider this a landscape of irreplaceable habitats that are well connected by hedges and field margins, and which are well-buffered from impacts of noise, lighting and traffic.

Many haul routes and access points will damage designated Roadside Nature Reserves (RNR) including on Parker's Lane and Wood Lane as well as at the BESS site on Lodge Lane, Great Moulton to name a few. All have locally significant wildlife which are under threat including sites with the nationally scarce sulphur clover. These verges represent possibly the last, best fragments of lowland meadow in the Claylands. Lowland meadow is an irreplaceable habitat which has suffered a catastrophic loss in the Claylands since World War II (Countryside Commission figures, 1984 puts the loss at almost 98%).

As all the green lanes and Roadside Nature Reserves are often under recorded yet botanically rich. A full botanical survey should be carried out on all hedges and road side verges that are subject to alternation or on a major haul route for East Pye Solar. East Pye Solar has failed to do so.

The crossings and disruption of the Hempnall Beck, near the Krons is considered of 'grave concern' by local ecologists. The stream runs into the River Tas, a chalk stream; pollution or changes to hydrology will be detrimental to the chalk stream, which is supporting White Clawed Crayfish. East Pye Solar have ignored the evidence from Norfolk Rivers Trust of the presence of white Clawed crayfish in the river Tas and within 2km from several sites including Site 4.

Other protected or threatened species in the area include hedgehog, yellowhammer, brown hare, badger, serotonin bats and a wide range of other bats, skylarks, linnets, bullfinch plus turtle dove (that breed annually at Wood Green), and other farmland birds. The loss of hedgerows and mature trees and the construction of the haulage road, particularly on CRC4, which is 8km long, and construction noise, will have an impact on these species.

Even if the fields with the solar panels are designed to deliver a biodiversity uplift, the extent of construction for haul roads and cabling across the landscape will have a significant impact for wildlife.

Existing research shows that 6 out of 8 species of bat can be negatively impacted by solar schemes; this is especially high for those that use underground bat hibernacular, such as those within the County wildlife Site at Spring Wood.

Conclusion

The Scheme will be detrimental across the area to biodiversity, protected species, ecology and the ancient natural landscape of the Claylands.

Lack of seasonal surveys demonstrates the lack of care and attention that would be given to this very special and nature-rich area and presents a cumulative risk and impact across this sensitive area from this Scheme.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to ecology and it cannot be adequately addressed by project-specific mitigation alone.

19.3 Cumulative impact on heritage

East Pye Solar will impact heritage assets across the scheme including Conservation Areas and listed properties.

In excess of 300 Grade I, Grade II* and Grade II listed properties will be affected through the impact on the setting of these heritage assets, and causing industrial-scale visual changes.

East Pye documents consider the impact to be generally low and 'not significant' yet also state many heritage assets would experience '*some degree*' of change to their setting. That is not insignificant.

When something that is out of character and 'alien' is placed within 100m of a listed building, impact is going to be more significant than East Pye Solar are stating.

Just placing industrialisation within this significant ancient area of Claylands with centuries of agricultural heritage will be detrimental and harmful. Permanently changing the area to suit a scheme, and for private profit, is unacceptable.

When considering East Pye with other major infrastructure projects in South Norfolk, including solar schemes and transport projects such as the Long Stratton bypass, a combined impact concerns are raised:

- Combined effects on the setting of listed timber-framed clay lump buildings;
- Industrialisation of historic rural landscapes surrounding villages;
- The possibility that new planting would take decades to mature and screen infrastructure;
- Out of character screening alone would change the character of openness and this ancient rural environment;
- Cumulative interaction with multiple large energy projects proposed across South Norfolk;

- Loss of agricultural heritage with the conversion of farmland which risks destroying the tangible, historic and functional link between the communities and their agricultural past

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to heritage, and it cannot be adequately addressed by project-specific mitigation alone.

19.4 Cumulative impact on Transport and Traffic

Introducing of such a large scale industrial project in this specific rural location raised significant concerns regarding:

- Cumulative traffic impacts;
- The capacity of narrow country lanes to manage heavy construction vehicles as well as additional construction worker traffic;
- Wear and tear to narrow lanes and roads not designed or structured for such HGVs and AILs;
- Proximity of some Sites to major transport routes of the A140 and key junctions, like Sub-sites 4A and 4B at the Hempnall roundabout;
- Road closures causing delay as well as cutting off communities from going about their daily life;
- National Highways highlighted concerns on junctions including that of the A47 with A140 which East Pye Solar has not surveyed nor assessed.

East Pye Solar are focusing their HGV routes on A140, B1527 and B1332. These are all main link routes across the local area allowing the traffic to disperse without major impact to small local lanes.

The **cumulative effects** of the East Pye Solar project, particularly when combined with the A140 **Long Stratton Bypass**, which is a major haul route north to south, could lead to significant traffic pressure in the area.

The peak daily HGV movements, especially if they coincide with other local developments including the Long Stratton expansion, will increase congestion.

The A140 and the bypass is a two way road that often experiences road closures from highway maintenance and accidents. This has an immense impact on narrow single track lanes in the surrounding area and unplanned closures generally brings the whole area to gridlock.

The local road network, while benefiting from the new bypass and the Hempnall roundabout, may struggle with the increased volume of heavy vehicles, particularly in the vicinity of Hempnall, Long Stratton and Great Moulton.

The current planning documents for the Scheme indicate that during the construction. Phase the expected HGV traffic is:

- Average daily HGV arrivals: 47 HGV a day
- Average daily HGV movements (arrivals and departures): 95 HGVs per day
- Peak Daily HGV arrivals: 69 HGVs per day
- Peak Daily HGV Movements: 138 two-way movements a day

Although the 'peak' figures would only occur at limited periods the impact will be significant.

The A140 is a major haul road north to south and is considered one of the main access routes across the scheme. With the A140S-B1527 exceeding the IEMA EATM guideline threshold of more than 10% on the flow increase of links with receptors of High Sensitivity (Long Stratton), the transport route for Sub-sites 2A, 2B, 2C, CRC3 and CRC4 needs rethinking. This is a major flaw, demonstrating lack of surveys and submitting plans too early without fundamental accuracy to the documents. It also demonstrates the disconnect on the southern cluster from the north of the scheme.

The final details of the AILs haven't been completed but the impact to the A140 will be very significant and will have a major impact across the region.

National Highways state that the use of the A140 is not used as an AIL route due to the concerns of the weight limits on various bridges proposed for the route and raise particular concern to the junctions rather than the roads themselves in particular the junction of the A47 with A140.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to transport and traffic, and it cannot be adequately addressed by project-specific mitigation alone.

19.5 Cumulative impact of Noise and Vibrations

The proposed development of these sites indicates the following anticipated cumulative effects on noise and vibration which hasn't been properly addressed by East Pye Solar.

Construction Phase Impacts: Significant noise and vibration are expected, primarily from pile driving for solar arrays, construction noise as well as the movement of heavy machinery and HGV movement.

No consideration is given to residential amenity and the rural background noise levels including to multiple listed buildings within close proximity to sites across the scheme that are of sensitive construction like timber-framed clay lump houses and Grade I listed churches.

The construction phase is expected to last at least 24 months, with potential for cumulative noise if multiple parcels are constructed simultaneously or in close proximity.

Lower background noise: Noise seems noticeably louder in rural areas even if the sound level meter would measure the same number of decibels. This is due to lower background (ambient) noise. Less constant sounds that create a 'noise floor' making any sound more significant and appear nearer and/or louder.

Less sound masking: A person's hearing is very sensitive to change in sound. A noise that rises 20dB above the background noise is more attention-grabbing than one that rises only 5dB about it even if the actual sound hasn't changed.

Sound travels farther: Rural areas offer fewer buildings and obstacles to block or scatter sound allowing sound to propagate over greater distances. Some weather conditions like cool, still nights allow sound to travel even farther and seem unusually clear. With South Norfolk being predominately flat or only slightly undulating, sound travels great distance.

Human perception: rural environments are significantly quieter than urban ones so sudden noises can feel more intrusive because the contrast between silence and sound is much greater.

Operational Noise: While solar panels are considered silent, the operation of inverters, transformers, and Battery Energy Storage Systems (BESS) within the site will generate low-level, consistent noise. The cumulative impact would be the combined noise of this equipment at the closest receptors.

As no consideration has again been given to residential amenity and rural background levels, this will be detrimental and debilitating.

Transport and Access: Cumulative noise effects are expected due to increased construction traffic on the local road network.

Maintenance Noise: weekly maintenance vehicles and the tankers used for washing the panels will be intrusive within the rural environment.

Replacement Noise: replacement of panels and BESS will be the same as construction noise and will be considerable within the rural environment and lasting up to 2 years.

Decommissioning Noise: this will be similar to construction and will impact for at least 2 years causing.

Conclusion: no consideration has been given to how the Scheme noise will impact the quiet rural environment and is considered not significant as measures have been done by desk top looking at urban impact rather than rural impact.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to noise and vibrations, and it cannot be adequately addressed by project-specific mitigation alone.

19.6 Cumulative impact on air quality

Construction Dust and Emissions: The construction of multiple sites across the region creates potential for cumulative air quality. This includes dust soiling and increased PM10 concentrations, particularly for sensitive receptors within 350m of a site or 50m of transport routes. This will effect multiple listed buildings including Grade I Listed places of worship and many buildings of sensitive construction.

Construction Traffic: The project is expected to generate Heavy Duty Vehicle (HDV) movements that could impact local air quality, necessitating an assessment of how these movements interact with traffic from other local developments, such as housing in Long Stratton.

Haulage routes including the A140 alongside Long Stratton and proposed as the main north/south route as well as B1527 as the main east/west route through Hempnall will have impact on local air quality with increased daily numbers of HGVs and other site vehicles.

If a fire were to occur at the Battery Energy Storage System (BESS) located at Great Moulton, the primary air quality concern would be the release of a **toxic smoke plume** containing hazardous gases and particulates.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to air quality, and it cannot be adequately addressed by project-specific mitigation alone.

19.7 Cumulative socio-economic impact

The cumulative socioeconomic effects of the proposed East Pye Solar scheme will be significant on a local level even though East Pye Solar considers the impact to be of national benefit.

- **Loss of BMV agricultural land** from conventional production forever as the land will degrade;
- **No decommissioning bond to restore** the land to pre-scheme quality;
- **Land is due to be compulsory acquired** so the land will not be owned by pre-scheme landowners. It is unclear what East Pye Solar, or whoever owns the scheme at decommissioning, will do with the land once the scheme ends;
- **Loss of agricultural jobs** due to mass loss of land permanently in one area directly, due to less land to farm, as well as indirectly through reduced supply chain demand;
- **Agricultural jobs will be less desirable** due to loss of value put on the farming sector and growing quality, local food;
- **No permanent on-site jobs will be created** once the Scheme is in operation (East Pye Solar);

- **Jobs for construction will be recruited externally** and shipped in and out;
- **Permanent visual change to the rural landscape** over a substantial area altering the character of this ancient landscape through industrialisation forever;
- **Tourism** is Norfolk's largest economic sector bringing in £5.9 billion and employing 54,000 people. Add that to the hospitality industry and the added attractions in and around Norwich, which has just been voted Sunday Times Best Place to live in the UK 2026, East Pye Solar will have a major detrimental and financial loss on local and county-wide tourism;
- **Small, independent tourist attractions** or those businesses that rely heavily on visitors to boost local numbers during the holiday season will see a loss including holiday lets;
- **County-wide tourism** will see a loss as the A140 through Long Stratton is the major tourist route to the Norfolk Broads and the 'tunnel of panels' at Long Stratton will change the beauty of Norfolk. Add that to the cumulative impact of further schemes that are already scoping and waiting to utilise East Pye Solar infrastructure. The knock on effect is massive;
- **Pressure on rural roads** and the local network that local residents rely on to go about their daily life;
- **Closing PRow** long term during the construction of the scheme will prevent people using them for leisure and as a practical route to reach the facilities of Long Stratton;
- **Changing the nature of PRow** when reopened will ruin a quiet country walk to one of enclosure and industrialisation. Screening will take decades to hide fencing and panels but will also change the character of an area from openness to one of enclosure;
- **Marketability Issues:** A study by the University of Birmingham suggests a typical **5.4% reduction** in relative prices for properties within 750m of large solar scheme. Homes are already unsalable in negative equity or are falling through as plans are appearing on searches. Who would want to live in an area surrounded by industrialisation?;
- **Increase in house insurance** due to perceived flood and safety risks. Already happening;
- **Lack of Compensation:** Currently, there is **no statutory compensation** for residents who suffer a loss in property value or business income due to the proximity of an NSIP project, unless their land is physically acquired;
- **Infrastructure & Maintenance:** Concerns have been raised by Norfolk CPRE that the "industrialisation" of the countryside will require long-term public spending on road repairs due to heavy construction traffic without guaranteed local tax benefits
- Impact cost to local fire service that are all 'on-call' would mean additional personnel costs and specialised equipment would be required to be prepared for BESS fires and infrastructure disasters. This cost would impact local residents council tax.

Conclusion: The impacts fall disproportionately on local residents and the County while most of the perceived energy benefits will be distributed nationally whilst profit will be private.

South Norfolk will be an energy industrialised area for the rest of the UK, changing the nature of the area from rural to industrialised forever and opening the door for further industrialisation whilst large global invest banks make vast private profits for shareholders.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to socia-economic impact, and it cannot be adequately addressed by project-specific mitigation alone.

19.8 Cumulative impact to soils and agriculture

81% of the land proposed for East Pye Solar Sites is BMV Grade 1-3a. In addition to that is the cabling corridor which is also mainly of BMV Grade 1-3a (although never assessed by East Pye Solar).

The land will be removed from production for 60 years of the scheme as well as construction and decommissioning.

With no decommissioning bond to insist the land would be restored to at least its previous quality, the land will degrade and left at it's post-scheme quality. East Pye Solar state that the soil will degrade.

Potential cumulative effects include:

- **Reduced local production** of cereals, oilseed rape, sugar beet and other crops will impact supply changing;
- **Reduced flexibility** for local farming businesses;
- **Fragmentation of farm holding** making field operations less efficient especially during construction on the cable route corridor which will have fields dissected diagonally or down the middle;
- **Compulsory purchased land** will be removed from agriculture permanently;
- **Cabling Route** land will be removed from production for 2 years and will require several years to recover reducing productivity;
- **Potential impacts on local agricultural supply chains** if multiple projects affect the same area;
- **Soil Compaction and Structural Damage:** Construction, operation (maintenance traffic), and decommissioning phases will result in deep soil compaction, which can take many years to recover from;
- **Soil Erosion and Runoff:** The panels can create runoff that leads to soil loss through erosion;
- **Ecological and Agricultural Management** for Sites will be for convenience and ease of management rather than to encourage biodiversity gain;

Conclusion: The project's scoping report notes that while individual, smaller projects might not seem significant, the cumulative, regional, and national loss of soil resources and agricultural land from projects like East Pye contributes to a larger, long-term impact on the farming industry.

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The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to soil and agriculture, and it cannot be adequately addressed by project-specific mitigation alone.

19.9 Cumulative impact to ground conditions

The cumulative impact on ground conditions from industrialised solar schemes when assessing across the lifetime of the 60 year scheme - from construction, through operation, replacement, to decommissioning.

The main cumulative impacts include:

Soil Compaction:

- Generally the greatest concern
- Compaction from heavy construction vehicles and cranes;
- Reduced soil porosity;
- Restricted root growth;
- Reduced infiltration of rainfall;
- Increased surface runoff and localised waterlogging.

If construction coincides with wet conditions compaction can extend well below the topsoil and may take years to recover.

Soil Structure and fertility:

Repeated disturbance from:

- Cable trenching;
- pile driving;
- access track compaction;
- substation foundations;
- BESS construction

All can alter soil horizons and reduce the quality of agricultural soils if reinstatement is poor. The BESS and Substations won't be reinstated.

With the large quantities of BMV land affected, cumulative disturbance across multiple projects could reduce the availability of high-quality agricultural soils for decades.

Erosion:

Construction exposes bare ground, increasing susceptibility to wind erosion, water erosion and sediment movement into nearby watercourses.

Drainage and hydrology:

Large solar schemes can cumulatively alter natural drainage patterns, infiltration rates, overland flow paths and local flood behaviour.

Although panels occupy only part of the land surface, concentrated runoff from panel edges can create localised erosion or ponding if drainage is not well designed.

East Pye have failed to properly assess the drainage and runoff effects especially in close proximity to the river Tas as well as the area of Long Stratton that flood or is at risk of flooding annually.

Soil biology:

Although there is a belief that a solar scheme can have benefits to the soil biology there is no evidence to support improved biology over a 60 year timeline as it hasn't ever happened.

Industrial solar and infrastructure is very different from resting soil in a private scheme managed by the landowner that has a vested interest to protect the soil and get the best out of it.

Industrial solar is more likely to have a negative impact due to soil compaction, disturbance during installation and altered soil moisture beneath dense panel arrays.

Contamination risks:

Ground condition will be affected by accidental fuel or oil spills during construction, transformer oils, concrete washout, wheel washing, and disposal of damaged equipment.

Risk management is only as good as the person responsible and the company behind it. We have seen what happened to Thames Water and what is still happening to the rivers due to lack of maintenance and responsibility.

Post Decommissioning:

Even if soil is not permanently degraded or no decommissioning bond for soil restoration is in place, ground conditions can affect ease of cultivation after decommissioning, drainage performance especially across the clay soil within the area of East Pye Solar scheme, crop yields will be reduced as soil is less performing and machinery access could be harder due to structure of soil.

Conclusion: The real question for BMV grade 1-3a land is whether soils can realistically be restored to their original agricultural capability after 60 years? There is no evidence to say they can.

The potential long-term effects on agricultural soil quality and capability particularly where extensive areas of BMV are involved, and the extent to which multiple projects affect the same locality, cannot be mitigated against.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider impact to ground conditions, and it cannot be adequately addressed by project-specific mitigation alone.

19.10 Cumulative impact of EMF

EMFs are generated by;

- Underground and aboveground AC cables;
- Inverters convert DC electricity from panels to AC)
- Transformers;
- On-site substations;
- BESS;
- Grid connection infrastructure

The solar panels themselves produce static (DC) electric fields but are considered weak and largely contained.

Effects on people:

Measurements at operating solar schemes are generally show magnetic fields:

- are highest immediately adjacent to transformers and underground cables;
- Drop off rapidly with distance (typically within a few meters);
- Are usually well below the exposure limits recommended;

Due to the rapid fall-off, cumulative exposure to nearby residents from a single solar field is generally low.

But what about multiple fields in close proximity to each other and on a far larger scale than previously researched? There is NO research to support or oppose EMF harm to humans on this scale however plenty of antidotal evidence.

Cumulative effects on wildlife are very different especially on bats, pollinators, fish and aquatic life although research is still limited it is now showing signs of being detrimental.

Cumulative effects of EMF exposure with other infrastructure associated with industrial sized solar like high-voltage transmission lines, BESS, substations is considered greater especially if exposure is near them all.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider EMF harm, and it cannot be adequately addressed by project-specific mitigation alone.

19.11 Cumulative impact to utilities

The cumulative impact on utilities from Site 4A and Site 4B of the East Pye Solar proposal becomes significant once the scheme is assessed alongside other solar projects, housing growth, grid-reinforcement works, and energy infrastructure upgrades in the Long Stratton area.

This is a rural parish with limited existing utility capacity, minimal redundancy, and infrastructure designed for dispersed agricultural use, not for industrial-scale generation.

Local network improvements are about avoiding future power outages not expanding the capacity.

The area currently has:

- Low-capacity rural electricity distribution (11-33kV);
- Limited water and wastewater infrastructure, often reliant on small mains or private systems;
- Minimal telecoms infrastructure, with patchy mobile coverage and limited fibre. Many households rely on satellite

Many rural properties rely on satellite services, like Starlink, for communication and many mobile phone providers are now offering satellite services as backup due to issues with signal problems in rural environments.

The Scheme includes extensive power conversion equipment, BESS installations and multiple high-voltage substations. The Environmental Statement should clarify whether electromagnetic emissions have been assessed for compatibility with modern satellite broadband services operating in Ku- and Ka-band frequencies, including user terminals located within the nearby rural properties, together with any proposed monitoring and complaint resolution procedures should interference be reported during operation.

The baseline is highly sensitive to cumulative pressure.

Cumulative effects occur when Site 4A and 4B of the East Pye Solar scheme is considered along side:

- Other solar projects feeding into the same grid corridor;
- Housing developments in Long Stratton, Hempnall, Tasburgh and beyond;
- Grid-reinforcement works for the Norwich-Branford 400kV line;
- Battery Storage installations;
- Road and drainage upgrades.

Each development places demands on utilities and together they create system-wide stress.

Site 4A and 4B, when assessed cumulatively with other Solar proposals, housing development and energy-infrastructure works, would:

- Overload local electricity and telecoms network;
- Increase pressure on water and wastewater systems;
- Alter drainage and hydrology across multiple sites;
- Create long-term waste-management challenges;
- Introduce permanent grid-reinforcement.

This would result in major adverse cumulative impacts on utilities that cannot be mitigated. This cumulative connection is a material planning concern under the NSIP cumulative effects guidance, NFFP infrastructure policies and local plan requirements for sustainable development.

19.12 Cumulative impact of major accidents and disasters

The Scoping Opinion issued in **February 2025** explicitly requested that "Major Accidents and Disasters" be a dedicated chapter in the upcoming Environmental Statement, rather than being "scoped out" as originally proposed by the developer.

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The Long Stratton area is:

- Of High Sensitivity yet seen as low-risk baseline even though it has a major road network passing through it;
- The area of Long Stratton, Tharston and Hapton Parish, along with all the surrounding parishes, is served by limited-capacity emergency services using the same narrow rural lanes as residents;

- Characterised as main settlement and dispersed properties, farms and heritage assets with long response times in adverse conditions;
- Fire and Rescue is run as 'on-call';
- The nearest A&E department is approximately 15 miles away and would take 30mins on a blue light;
- Assisted by air ambulance for longer distances and more serious emergencies;
- The main emergency route is A140 from Norwich for specialist Fire and Rescue as well as emergency medical attendance.

That means the landscape has little built-in resilience to multiple, simultaneous incidents.

Cumulative risk arises when Site 4A and 4B of the East Pye Solar scheme is considered alongside:

- Other solar sites, further solar projects and associated BESS and Substations;
- Housing growth and increased traffic;
- Grid-reinforcement works and high-voltage infrastructure;
- More HGVs, more plant, more people, and more complex utility networks.

Each scheme in isolation is presented as 'low-risk' however together they raise the probability, complexity and consequence of major incidents.

When assessed cumulatively with other solar projects, housing growth and grid-reinforcement works, East Pye Solar materially increases the overall risk profile of the parish, and neighbouring parishes within the scheme, in relation to major accidents and disasters.

The combination of intensified HGV traffic, BESS and substation fire potential, pollution pathways, altered drainage and constrained emergency access results in a higher likelihood and greater consequence of serious incidents than would otherwise exist in this low-risk rural area.

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider major accidents and disasters, and it cannot be adequately addressed by project-specific mitigation alone.

19.13 Cumulative impact of glint and glare

- **Cumulative Impact Potential:** Cumulative glint and glare effects are considered possible for the East Pye Solar Project especially to Sub-sites next to road networks like Site 4 and Site 2C that are adjacent to the A140 and Site 5 next to B1527, causing visual discomfort and, the very least, sudden distraction;
- Glint and Glare will be noticeable across the area especially from those sites that are on elevated or undulating topography like site 5 and site 7 or stood proud of the road network like Sub-Site 4A;

- **Tibenham Airfield (Gliding Centre):** The General Aviation Advisory Committee (GAAC) and local gliding clubs have raised significant safety concerns regarding the proximity of East Pye Solar to Tibenham Airfield regarding glint and glare, bird strike and proximity to the runway;
- **MoD** have raised objections to The Drovers due to safety concerns over bird strike and interference with radar as well as glint and glare. As the area of South Norfolk proposed for East Pye Solar is used daily by RAF and AAF for ‘dog fighting’ manoeuvres and low flying military transport plans, the scheme could have significant impact to their daily flight training and should be considered;
- **Glint and Glare:** A dedicated technical assessment is required to evaluate potential dazzle for pilots on approach or in the circuit. The Scoping Opinion mandates that the Environmental Statement (ES) assess these effects for both Tibenham and other nearby private airfields (e.g., Old Buckenham Aerodrome).

The cumulative risk is a material consideration under the NSIP regime and NPPF requirements to consider glint and glare risk, and it cannot be adequately addressed by project-specific mitigation alone.

Conclusions

The East Pye Solar scheme should be rejected as the applicant's case rests on a general national need for renewable energy, but it has not demonstrated a need for this particular utility scale transmission solar scheme in this particular location. The applicant's own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges, and that general claims about 'optionality' and 'attrition' are relied upon to justify the project despite major local harm. The BESS case only has Gate 1 status, not a secured future connection, meaning it is not 'aligned' with the Clean Power 2030 Action Plan either in this region or nationally.

National policy may support solar generation in principle, but it does not require every utility scale transmission solar scheme to be consented regardless of location, legal constraint, heritage harm, ecological risk, agricultural loss and cumulative impact. Where regional solar ranges have already been met by prioritised schemes, the planning balance must give substantially greater weight to whether this particular 500MW NSIP is necessary, proportionate and environmentally acceptable. In our submission, it is not and for the following reasons:

1. Land Parcel 4 is structurally unsuitable and should not form part of the scheme

Land Parcel 4 is one of the most sensitive parts of East Pye Solar and is subject to multiple overlapping constraints: conflict with the adopted Long Stratton Neighbourhood Plan, harm to the setting of the Long Stratton Conservation Area and designated heritage assets, location within a barbastelle bat Core Sustainance Zone, cumulative effects with major Long Stratton growth, loss of Best and Most Versatile agricultural land, and highways safety and glint/glare risks on the A140.

These are not matters capable of being resolved by landscaping, micro-siting or later management plans. They arise from the location itself. Land Parcel 4 is on the immediate settlement edge, at the northern gateway to Long Stratton, and straddles the A140. It functions as the transition between the settlement and the countryside. Industrial-scale solar development in this location would replace open agricultural land with arrays, security fencing, access tracks, lighting, CCTV, cabling, conversion units, a construction compound, an HGV holding compound and a 132kV substation.

In addition to Site 4 is the 8km of cable route that sits mainly within the parish of Long Stratton and will cause untold harm and distress to the community, the businesses that rely on the land as well as the character and wildlife across the corridor. It also demonstrates how disjointed the scheme is to require 8km of cabling to join the majority of the scheme to the infrastructure needed to transmit it to the grid.

2. Conflict with the adopted Long Stratton Neighbourhood Plan

The Long Stratton Neighbourhood Plan forms part of the statutory development plan. The objection material identifies its emphasis on:

- protecting the historic character and setting of Long Stratton;
- maintaining a clear distinction between the settlement and surrounding countryside;
- safeguarding rural approaches, landscape buffers and key views;
- managing growth through planned housing, not industrial infrastructure.

Land Parcel 4 directly conflicts with those objectives. It sits on the immediate edge of Long Stratton and performs the role of open countryside buffer. The proposal would urbanise and industrialise that edge, undermining the planned settlement strategy at precisely the point where the Neighbourhood Plan seeks to preserve the relationship between the town and its rural setting.

The applicant has not provided a lawful parcel-specific justification for overriding this adopted local policy. The general national need for solar cannot substitute for proper analysis of the development plan conflict.

3. Harm to the Long Stratton Conservation Area and designated heritage assets

Land Parcel 4 lies within the setting of the Long Stratton Conservation Area and is closely associated with a high concentration of designated heritage assets, including Grade I St Michael's Church, Grade II* The Old Rectory and numerous Grade II listed buildings. Open agricultural land along the historic Roman road, long views into and out of the settlement, and the legibility of historic development patterns are central to the significance of this area. This infrastructure in addition to new housing would create continuous development between Long Stratton and Tasburgh.

The harm affects the ability to understand the historic relationship between Long Stratton, Stratton St Michael, the A140 Roman road, the churches, farmsteads, listed buildings and surrounding agricultural land. Solar infrastructure on both sides of the A140 would introduce an industrial character into views that presently contribute to heritage significance.

Screening planting cannot remove this harm. Dense planting would itself reduce openness and obscure the historic agricultural setting. Accordingly, the proposal gives rise to high-weight designated heritage harm. Under national heritage policy, great weight must be given to the conservation of designated heritage assets. The applicant has not shown clear and convincing justification for this harm.

4. Barbastelle bats and European Protected Species constraints

Land Parcel 4 is within a Core Sustenance Zone for barbastelle bats, linking it functionally to confirmed and likely maternity colonies in the wider East Pye landscape. CSZ land is essential

for foraging, commuting and maintaining breeding success. East Pye Solar has recognised the whole area as of national importance for bats, with barbastelle activity recorded across the entire scheme area,

The proposal would introduce extensive arrays and fencing, lighting, CCTV, inverter infrastructure, prolonged construction disturbance, and fragmentation of functionally linked habitat. Peer-reviewed research demonstrates that ground-mounted solar has a negative impact on bat activity through habitat loss and fragmentation. In these circumstances, the applicant has not demonstrated that disturbance or damage to breeding or resting places can be excluded. Nor has it demonstrated that any European Protected Species licence would be grantable, including the requirement to maintain favourable conservation status. This legal constraint cannot safely be deferred to a post-consent protected species mitigation strategy.

5. Best and Most Versatile agricultural land

Land Parcel 4 comprises approximately 101 hectares of agricultural land, including Grade 2 Best and Most Versatile land, used for productive crops including various cereals, oilseed rape and miscanthus. The objection material records that Site 4 is made up of 12 agricultural fields listed as Grade 2 BMV. National policy expects poorer quality land to be preferred where significant development of agricultural land is necessary. The applicant has not demonstrated why this high-quality land at the edge of Long Stratton is required when the need for this project in this region is already weak. The long operational life, construction traffic, piling, cabling, access tracks, compounds and altered drainage create a material risk of lasting soil degradation. The assertion of reversibility should be given little weight unless supported by enforceable restoration evidence and financial security.

6. Water environment, River Tas catchment and white-clawed crayfish

Site 4 lies in a highly sensitive chalk-stream and chalk-aquifer catchment, with hydrological connectivity, private water supplies, private sewerage and vulnerable receptors around the scheme. The area around site 4 and Long Stratton is already prone to flooding, with several significant incidents recorded in the past decade. Impacts on private sewerage and hydrological connectivity have not been assessed, and insufficient modelling has been carried out to understand the true impact of this scheme.

Norfolk Rivers Trust has provided evidence from 2022 (shared with East Pye Solar pre-application), of a breeding white-clawed crayfish colony within 2km of Site 4A. However, East Pye Solar claims there are no records post 2016; their aquatic surveys were carried out when streams and ditches were dry.

Construction and operation of Land Parcel 4 would involve ground disturbance, runoff changes, possible sediment mobilisation, cable works, construction traffic, and potential

pollutant pathways into the River Tas catchment. The water environment issues therefore go to legal compliance, ecological protection and the adequacy of the Environmental Statement.

7. Highways safety, glint and glare, and gateway harm

The application relies on out-dated and inconsistent mapping, specifically in the area surrounding Long Stratton. The Works Plan is on an outdated base map which does not include the Long Stratton Bypass, new road layouts and new ecological landscaping.

Land Parcel 4 straddles the A140, a major strategic route and the northern approach to Long Stratton. The scheme risks severe glint and glare risk to road users, conflict with existing congestion and planned highway changes, and unsafe interactions with public footpaths and local access. This is a public safety, landscape and settlement-planning issue, not a private amenity point.

8. Cumulative and in-combination effects with Long Stratton growth

Land Parcel 4 must be assessed in combination with major planned growth at Long Stratton, including the new bypass, extensive housing development, associated infrastructure, altered traffic flows, lighting, drainage changes and cumulative pressure on the settlement edge. The ES fails to properly assess the in-combination effects of solar infrastructure, large-scale housing growth, transport infrastructure and other energy schemes in this location. This omission materially understates the effect on settlement setting, heritage assets, landscape character, residential amenity and highway safety. Land Parcel 4 is a tipping-point location. Further industrialisation here would undermine the planned form and identity of Long Stratton.

Summary

Rejection should be given to the East Pye Solar Project as a whole. The applicant has not demonstrated that this scheme is necessary in this location, particularly where its own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges. Generalised claims of national need, optionality and attrition do not justify a highly damaging scheme in a legally and environmentally constrained landscape.

Land Parcel 4 is particularly unacceptable. It conflicts with the adopted Long Stratton Neighbourhood Plan, harms the setting of the Conservation Area and designated heritage assets, affects a nationally important bat landscape, risks harm to a sensitive chalk-stream catchment, removes Grade 2 BMV agricultural land, creates highways and glint/glare risks, and has not been properly assessed cumulatively with Long Stratton's planned growth.

We respectfully request that the Examining Authority gives substantial weight to these objections, rejects the applicant's site-specific need case, and recommends refusal of the

scheme. If the scheme is not refused in full, Land Parcel 4 should be removed from the Order Limits.

AI disclaimer: This submission has been created from manual research carried out by a human research team. It has been summarised and compiled by a bespoke GPT within a closed project folder. The submission has been argued, assembled, edited, and checked manually by humans.