Morningthorpe and Fritton Parish Council

East Pye Solar - Deadline 2 submission

Interested Party Number: [redacted]

Response to East Pye Solar Ltd documents published on 14 October 2026

Scope and opportunity to participate

Morningthorpe and Fritton Parish Council (MFPC) submits this response to the Applicant's documents published on 14 October 2026. It addresses the answers given to the Council's earlier written and oral representations and comments on new or revised information affecting our parish, particularly Sites 5A and 5B. MFPC maintains its objection. We acknowledge useful clarification where it has been provided, but remain concerned that a number of our questions are met by references to existing assessments, conclusions of negligible or non-significant effects without enough explanation of how those conclusions apply locally and the number of mis-represented questions/points we raised.

The short period between publication on 14 October and Deadline 2 on 27 October has made a thorough review exceptionally difficult. Parish councilors and residents must do this work alongside employment, caring responsibilities and other commitments. When checked on Friday 16th October at 8pm, the linked Examination Library was still dated 2 October and the Deadline 1 section did not contain the individual document references needed to navigate and cross reference the new material. The Council has therefore used document titles, website identifiers and Applicant response IDs in this submission. [P1]

The difficulty is greater for residents with limited digital skills, unreliable internet access or no practical ability to search large technical PDFs. This particular difficulty in respect to the whole process to date was raised at the Procedural Hearing on 15th September. Documents from different authors appear together, and a resident must often open and read the revision schedule before discovering whether a document contains substantive changes or only a corrected base map. We recognise that EPS provides revision schedules inside its documents; our concern is the time and digital ability needed to find and use them. Residents who rely on help from others or on paper copies lose further time arranging access, reading the material and posting a response.

We ask that responses if necessary, to the 14 October material are accepted at Deadline 3 where the short review period has prevented a full response at Deadline 2. At a minimum, the Council and residents should be allowed to supplement their comments once outstanding references and material information are available. A matter not addressed here should not be taken as accepted.

We refer throughout this document to MFPC's detailed Written Statement to provide the Council's detailed evidence without repeating it, and to identify the matters on which a further response is now requested. References to Chapters and Appendices of the Written Statement are references to MFPC's own evidence. [M1]

Our direct comments principally concern EXAM/9.22, MFPC-PDA-001 to MFPC-PDA-018; EXAM/9.19, VC-001 to VC-013, which record the OFH2 representations made on behalf of MFPC; the ISH1 responses in EXAM/9.17; and the answers in EXAM/9.2, including the Council's compound question and the wider ExQ1 responses relevant to the parish. We also examine the revised design commitments, water and drainage documents, evening noise assessment, wellbeing addendum and draft DCO. [E1–E12]

The adequacy of the Applicant's answers

MFPC's earlier representations asked for scrutiny of the location and combined effects of the Site 5 development: the 400 kV substation, solar arrays, compound, access arrangements and associated infrastructure. They also raised private water supplies, sewage and drainage systems, heritage, ecology and the effects of works at Sites 5 and 7 together. These were questions about the consequences of this particular proposal for this particular place. [M2; E1, Table 3.2]

Several answers repeat that an Environmental Statement chapter assesses the scheme as a whole, refer back to a previous response, or point to a management plan. Cross references can be helpful, and MFPC is not asking EPS to reproduce its assessments. However, a reference needs to lead to an explanation of the point raised. Where our concern is that a local feature, activity or effect has not been adequately represented, repeating the overall conclusion does not resolve that concern.

The same applies to the terms "negligible" and "not significant". MFPC recognises that these are assessment terms and does not assume that every local objection establishes a significant environmental effect. Equally, those conclusions should not close down consideration of the underlying evidence. The examination needs to test the receptor selected, the activities and distances assumed, the duration and frequency of exposure, the mitigation relied upon and the consequences if those assumptions prove wrong. An effect described as not significant may still matter to an affected household and require a practical safeguard.

We are particularly concerned about the repeated movement from a broad conclusion to a future plan without a clear account of the steps between them. The Council asks the Examining Authority to distinguish an effect shown by evidence to be negligible from an effect assumed to be acceptable because more information or a management plan will follow. The sections below identify where that distinction matters to our parish and the further explanation or commitment sought.

Why the substation and wider development remain at Site 5

MFPC-PDA-002, 003, 011–015 and ISH1 Action Point 19 concern the selection and justification of Site 5. EPS explains the need to collect circuits from several sites at the Site 5 substation, its central position, existing screening, access from the A140 and B1527, and the consideration of constraints during design. We accept that the electrical system imposes genuine constraints. Explaining how the selected network connects to the selected substation does not, by itself, explain why that location was preferred to alternatives available as the connection strategy developed. [E1; E3, Action Point 19]

The remaining request is a clear account of the reasonable locations or configurations actually considered, the constraints and effects compared, and the reasons for retaining Site 5A. This should distinguish the technical need for an intermediate substation from the choice of its particular location. If no comparative appraisal of other locations was undertaken, EPS should say so and explain why its design process was sufficient. Chapters 4 and 5 of MFPC's Deadline 1 Written Statement now provide the Council's fuller evidence and questions about that process. [M1]

In OFH2 responses VC-002 and VC-013, EPS relies on the policy position that an application should not be refused simply because another suitable site might cause less harm. MFPC acknowledges that answer. Our case does not depend on proving that the Applicant must find an absolutely "best" site. It concerns the reasons for this choice, the extent to which avoidable harm

has been reduced, and whether the resulting effects are acceptable. That policy response does not dispose of those questions. [E2]

EPS also relies on access from the strategic road network in support of the location. MFPC's earlier concern was about the final approach, accesses and nearby users. NCC's Local Impact Report strengthens the need for a specific answer: it seeks changes to Site 5 access arrangements and further evidence on structures and abnormal loads. This does not prove that access is impossible. It means that good accessibility should not be treated as an established advantage without identifying the works, surveys and approvals still needed to make the route usable. [E1, MFPC-PDA-002; O1, paragraphs 8.12 and 8.19–8.22]

MFPC accepts EPS's clarification that the Site 5A substation footprint is on Grade 3b land although the original MFPC-PDA-005 question also concerned development affecting higher quality agricultural land more widely. The location of the substation on the small area of Grade 3b land which is surrounded by Grade 2, does not settle the separate issue of the higher quality land occupied by the arrays, tracks and other works. EPS should distinguish those areas and explain the justification for the wider Grade 2 land take. We refer to Chapter 15 of the Deadline 1 Written Statement for the Council's detailed evidence. [E1, MFPC-PDA-005; E2, VC-002; M1]

The revised Design Principles, Parameters and Commitments document allows a Site 5A substation compound of up to 3.5 hectares and busbars up to 13 metres high. It also permits foundations, depending on ground conditions, including piles to a maximum depth of 12 metres. These are limits to be assessed, not a statement that every element will be built to its maximum. MFPC asks for a single Site 5A plan showing how the permitted equipment, foundations, access, drainage, screening and safety clearances can fit together, alongside the constraints that EPS says informed the location. [E5, Table 4.3]

EPS's siting answer identifies the high pressure gas main as a constraint. National Gas's representation raises the need for electrical interference assessments and protection against construction loading and vibration. MFPC asks for confirmation of the current agreed position and a plan demonstrating compatibility between the pipeline protections and the proposed Site 5 layout. This is an obvious area of concern for residents near to Site 5 as any damage to the high pressure national feeder main gas pipe poses a direct safety concern to them. The presence of a legal protection mechanism should not be confused with completion of the engineering assessment. [E1, MFPC-PDA-002; E10, Schedule 14; O5, paragraphs 3.3–3.4 and 7.1–7.2]

The compound and the local construction programme

The answer to ExQ1 Q1.2.9 follows MFPC's question at ISH1 about the purpose of the Site 5 compound. EPS states that the compound will serve the substation and solar installation in Sites 5A and 5B and will not distribute materials to other construction locations. This answers an important part of the Council's question. The restriction should now be secured in the construction documents, covering storage, parking and other logistics uses as appropriate, so that the compound cannot subsequently acquire a wider role. [E4, Q1.2.9]

That clarification does not establish the intensity of activity within the compound or at its access points. The outstanding information is its programme of use, expected workers and vehicles, delivery peaks, storage and stockpiles, lighting, generators, dust controls and reinstatement. These matters should match the assumptions in the traffic, noise and air quality assessments. MFPC's Deadline 1 Written Statement, Chapters 4, 11–13 and 19, provides the local context and detailed concerns to which a further response can now be made including the fact that The Applicant's

predicted vehicle movement figures are based on projects that themselves have yet to be built so no firm comparison data has been applied. [M1]

In VC-008 and VC-010, EPS says that construction effects have been assessed across the scheme and that works will be staggered, with traffic varying over the programme. The Applicant has used average daily figures per Site providing no clear statement as to what the peak volume of traffic that would be experienced by the residents. MFPC accepts that the maximum daily flow is not expected every day throughout construction. But a peak day assessment and a statement that work is staggered answer different questions from the length of time a community may experience successive disruption. The Council requests a local programme showing overlaps and successive phases at Site 5, Site 4B, Site 7 and the connecting cable routes, and the roads and accesses used by each. [E2]

The programme should make clear when residents are likely to experience several activities together and when one phase is expected to follow another. If coordination is relied upon to reduce effects, the relevant limits should be secured. If there is flexibility to alter the order of works, EPS should explain how the assessment covers that flexibility and how unacceptable local overlaps would be prevented.

The local programme also needs to distinguish initial construction from major replacement works during operation. In Q1.2.7 and Q1.9.3, EPS explains that all solar panels are expected to be replaced once, with the replacement programme lasting up to 24 months across the scheme. This does not mean that each household would experience continuous works for that entire period but they may well experience the disruption whilst they go about their daily activities for the 24 month period. It does mean that the operational phase includes a substantial programme beyond routine maintenance. MFPC asks EPS to identify the assessed assumptions for Site 5, including delivery and removal traffic, any renewed compound use, working hours and noise controls, and the mechanism for approving and notifying residents of that programme. EPS's stated controls on replacement specifications should also preserve the assessed limits on appearance, noise and other effects. [E4, Q1.2.7, printed pages 71–74, and Q1.9.3, printed pages 144–147]

Traffic safety and the conclusion of negligible effects

In VC-008, EPS describes the construction traffic effects on the B1527 as temporary and negligible. MFPC's concern was not only the change in total traffic on a road link. It was also the interaction between construction vehicles, accesses, homes, businesses, the nursery and people using local paths and roads. Calling an effect temporary does not explain the duration, frequency or severity of those interactions nor takes into account the impact of other road users finding alternative routes when trying to avoid other Sites being constructed. [E2, VC-008 to VC-010]

NCC's requirements are directly relevant to testing that answer. Paragraph 8.12 seeks one principal B1527 access, A23 or A24, for construction and abnormal loads, changes to A25/A26, and structural assessment of TM29302 and TM29303 (one of which is the historic brick tunnel that is associated with the Medieval Boyland Hall and runs directly under the B1527 and is adjacent to A23). Paragraph 8.14 considers The Krons unacceptable for HGV movements and does not accept construction sequencing as justification for using unsuitable roads. These are specific questions of local suitability which a negligible overall traffic conclusion does not answer. EPS should state which changes it accepts, supply the corresponding drawings and explain any remaining disagreement. [O1]

EPS's account of staggered construction therefore needs to be reconciled with the highway authority's position on the routes themselves. A lower number of vehicles at a particular time

does not, without further evidence, establish that the proposed vehicle can safely use a constrained route. MFPC seeks a settled route arrangement, with clear exclusions where necessary, and evidence that the actual abnormal load vehicles can negotiate it. This should include the required surveys, clearances, vegetation works and structural checks. This is particularly pertinent as The Applicant's Transport Specialist's identified vehicles needed for the AIL into Site 5 are significantly larger than the vehicles Stantec have used to model the access sweeps for the proposed access points. There are also inconsistences with the printed vehicle sizes on these reports, the stated vehicles used to calculate the sweeps and speed limits on the highways at the proposed access points [E2, VC-010; O1, paragraphs 8.14 and 8.19–8.22]

In VC-004, the Applicant notes the concern about reconciling glint and glare screening, visibility splays and abnormal load access. That is an acknowledgement, but it does not provide the reconciliation requested. MFPC asks for a coordinated drawing of A23 and A24 showing the vehicle assessed, its swept path, visibility requirements and the screening and vegetation that can remain calculated on the correctly agreed vehicles and current road conditions. Any loss of screening should be carried through into the landscape, heritage and residential assessments. [E2, VC-004; O1, paragraphs 6.24–6.25]

In VC-009, EPS confirms that construction vehicles will not use the nursery entrance for turning or waiting. MFPC was not making that point. The Council was concerned with the increase in traffic movements at this section of the B1527 which is know for traffic accidents (latest was at the Nursey entrance in Feb 2026). The Council also raised concerns regarding major construction activities occurring so close to young children and babies who use the outdoor space daily. EPS says that construction beside the nursery will occur during a defined part of the programme. This does not answer the full concern about children's use of the nursery and its outdoor space while nearby works take place. The response should identify the relevant activities, their duration and hours, and the noise, dust, traffic and access measures applying to those periods. The recent large building project - Long Stratton Bypass, saw dust, noise and construction fumes affecting households a significant distance from the works themselves. With the amount of infrastructure planned for Site 5, this remains a significant concern. The Council's detailed evidence is set out in its Deadline 1 Written Statement, Chapters 11–14. [E2; M1]

The basis for the traffic figures also remains material. NCC asks whether the baseline reflects conditions following the Long Stratton bypass and whether construction water deliveries are included. MFPC requests that EPS reconcile the daily and peak figures with the compound programme and all relevant vehicle types, including deliveries for welfare and dust suppression. The local assessment should be clear enough to compare with actual traffic once work starts. [O1, paragraphs 8.17–8.18]

MFPC seeks enforceable routes, a delivery booking and monitoring system, advance notice of abnormal loads and a prompt route for reporting breaches. Responsibility should remain with the undertaker for its contractors and delivery vehicles. These requests follow from the local concerns already raised; they should not depend on residents first demonstrating a serious problem after construction begins.

For VC-011, MFPC point was not that there were going to be any permanent path closures proposed but that there are safe temporary routes whilst the paths are closed and that there will be significant changes in the lived experience of the PRoW after reopening, as addressed in sections 5 and 7 and in the Council's Deadline 1 Written Statement, Chapter 11 and Appendix 1. The promised path management measures should be specified for the affected crossings and diversions, including any road section without a footway. NCC's paragraph 8.16 supports the need for those location-specific arrangements.

Q1.14.1 identifies the traffic measures still subject to detailed design or agreement: temporary speed management, traffic signals, lane or road closures and diversions, passing places, and the scope and timing of road condition surveys. MFPC asks EPS to identify which of these measures are necessary around Site 5 to support its assessment conclusions, where they would apply and when they must be approved and operational. The distinction between enforceable temporary speed restrictions and advisory limits should be clear. Where a safe route depends on a measure being agreed, the relevant movements should not begin before that measure is in place. This request gives practical effect to NCC's concerns about route suitability and enables residents to understand what the conclusion of negligible effects actually assumes. [E4, Q1.14.1, printed pages 212–213; O1]

Noise receptors and the new evening assessment

VC-003 explains that EPS uses representative noise sensitive receptors (NSRs) and that absence of a separate property entry does not automatically mean a house has been excluded. MFPC accepts that principle and clarifies its earlier criticism accordingly. The issue is whether EPS can demonstrate that its selected receptors cover the exposure at the homes and outdoor areas concerned and whether their measurements are correctly applied to the residential curtilage of those properties and if local geography means that the nearer property would not experience the noise or vibration in the same way as one slightly further away in a different direction. [E2, VC-003, printed pages 24–26]

EPS identifies NSR29 for compound works; NSR28, NSR29, NSR30, NSR31, NSR32 and NSR34 for solar piling; and NSR28, NSR31, NSR32, NSR33 and NSR35 for operational noise. It also explains the 300 metre construction study distance from the activity. These details allow a more focused question: which properties does each receptor represent, for which activity, and why would the other properties experience no greater effect? A short schedule and a readable plan showing the working areas and NSRs would allow that explanation to be checked. Chapter 12 of MFPC's Deadline 1 Written Statement now provides the Council's detailed property information for that exercise. [E2; M1]

A simple assumption that greater distance means less effect should be shown to hold for the relevant combination of sources, working positions, screening and background sound. For traffic noise, VC-003 identifies The Street as the most relevant local link. EPS should identify the B1527 link and the properties beside A23 and A24 represented by it, and explain where access movements, waiting and acceleration are considered.

The new Evening Noise Assessment is relevant even where it is not a direct answer to MFPC. MFPC asks what evidence supports that treatment for the plant ultimately installed, how any noticeable tone or hum will be addressed, and where tracker motor operation is included or ruled out as a relevant contribution. The Council is not asserting that a correction must always be applied; it is asking how the assumption will be verified. [E6, paragraphs 1.6.1–1.6.4]

Table 1.13 reports a rating level and background level of 28 dB at NSR31, with a negligible conclusion. This is useful evidence, but also illustrates why the secured limit matters. Paragraph 1.7.7 proposes a 30 dB rating level limit for non-BESS equipment where the background is 30 dB or lower. At a location with a 28 dB background, that limit permits a higher rating level than the 28 dB prediction. EPS should explain whether the assessment conclusions remain valid at the permitted limit, rather than only at the modelled value, and whether the limit applies to the combined relevant plant. [E6, Table 1.13 and paragraph 1.7.7]

Paragraph 1.7.7 says the operational management requirements will be updated. The Council requests the actual revised wording, with correct table and document references, a clear identification of the receptors protected, and a procedure for commissioning checks, representative operating conditions, complaints and corrective action. The references in that paragraph should be checked so that they lead to the intended management plan and limits. A proposed future amendment is not the same as a clear enforceable control. [E6; E10, Requirement 14]

Paragraphs 1.3.1–1.3.3 identify normal construction hours and exceptions, including abnormal loads, concrete pours, cable works and continuous drilling. MFPC does not suggest routine evening construction is proposed. It asks EPS to identify the exceptional activities likely to affect this parish, their possible duration and the assessment and approval process before they occur. The fact that activity is exceptional does not establish that it will be immaterial to the households beside it especially as they may also be facing daytime noise disruption. [E6]

7 Landscape heritage and the lasting experience of the parish

MFPC-PDA-004 and 016 and OFH2 VC-005 and VC-007 raised the combined effects and everyday experience of the Site 5 development. EPS says the LVIA assesses all visible scheme components and accepts significant adverse effects in some locations. It also acknowledges that mitigation will not preserve the landscape unchanged. MFPC recognises those acknowledgements. The disagreement concerns the extent, duration and weight of the remaining harm, including the loss of openness where planting screens equipment but encloses a previously open view. [E1; E2]

South Norfolk District Council provides specific organisational evidence supporting that concern. Its Site 5 recommendations say the loss of rural openness is underplayed at VL1, VL4 and VL6 and that effects on FP11 and FP5 should not be treated as materially reducing at Year 15 where openness remains lost. This directly tests the reasoning behind reduced effects after planting matures. MFPC asks EPS to respond to these identified locations and explain whether its ratings and planning balance change. [O2, paragraph 7.7.6]

MFPC also acknowledges the District Council's recommendation for a 3 metre panel limit throughout Site 5A, eastern Site 5B and beside The Street, and more effective low level screening at VL6. These are practical ways of reducing the harm MFPC has raised. EPS should identify whether they can be incorporated into the design parameters, and give a specific explanation where it proposes to retain taller panels. Supporting these measures does not mean that the Council regards the remaining development as acceptable. [O2, paragraph 7.7.6; E5] Chapters 7 and 10 and Appendices 1–3 of our Deadline 1 Written Statement provide detailed local photographs, route evidence and heritage context for the further examination of these matters. [O2; M1]

MFPC-PDA-006 and VC-006 largely refer back to earlier heritage answers and commitments to retain vegetation. Our original concern was the contribution of the rural setting to Fritton Conservation Area and the listed churches, and the combined effect of the substation, arrays and associated works. Retention or replacement of hedges does not by itself explain the effect on heritage significance. MFPC asks EPS to identify the assessed harm to each relevant asset, the role of the open setting, and how the whole permitted development has been taken into account. The new detail in Chapter 10 of our Written Statement should inform the next response. [E1; E2; M1]

In Q1.11.4, EPS commits to submitting a sequential route assessment at Deadline 2, covering journeys that use more than one public right of way. MFPC welcomes that commitment. It should cover connected routes used by Morningthorpe and Fritton residents, including road sections linking the paths and the successive experience of arrays, substations, fencing and screening. The Council's earlier requests for inspections of the B1527, The Street, accesses, The Krons and local paths should inform that work. MFPC reserves its opportunity to comment after the assessment is published: [E4, Q1.11.4, printed pages 199–200; M3]

Q1.11.1 explains that an initial desk review covered residential properties within 500 metres, after which 20 properties within 100 metres of the maximum development parameters were assessed. Only two progressed to detailed Step 4 assessment. EPS reasons that properties beyond 100 metres would be even less likely to experience an overbearing effect. MFPC acknowledges the wider initial review, but asks for the Site 5 screening decisions to be explained. Distance must be considered alongside orientation, land levels, intervening vegetation and the height and extent of the proposed infrastructure. A closer property with effective screening may demonstrate a lesser effect than a more exposed property farther away. [E4, Q1.11.1, printed pages 194–196]

Q1.11.3 says that properties not taken forward to Step 4 benefit from existing screening and confirms that Year 1 and Year 15 effects were considered for the two properties that did progress. MFPC asks EPS to identify the evidence supporting the screening decisions around Site 5, including winter views and the period before new planting establishes. The Council recognises the distinction between significant adverse visual effects and the higher Residential Visual Amenity Threshold. A conclusion that a home would not experience an overwhelming or overbearing effect does not remove the need to assess and give appropriate weight to significant adverse effects during the first 15 years. [E4, Q1.11.3, printed pages 197–199]

In Q1.2.6, EPS confirms that permanent substation lighting would serve maintenance and security, remain off by default and operate through motion sensors. MFPC welcomes that clarification. The detailed controls should specify activation duration, shielding, direction, and permitted light spill at homes, gardens, paths and ecological features around Site 5 especially in relation to the multi species of bats identified by EPS that are currently found in and around Site 5, supported by the promised lighting calculations and contour plans. Measurements to report and address faulty, misaligned lighting should also be secured, especially as motion sensor activated lights are renowned for being falsely triggered. Construction lighting outside normal hours should be separately identified and controlled. The Council seeks assurance that repeated activation or prolonged maintenance work will not undermine the stated protection of the parish's night time environment. [E4, Q1.2.6, printed pages 69–71]

Relevant examination approach from Green Hill Solar Farm

MFPC draws the Examining Authority's attention to the recent examination and decision concerning Green Hill Solar Farm (EN010170). During that examination, the Examining Authority considered that retaining solar arrays within field AF29 would cause unacceptable harm to the character and recreational experience of Newland Road Quiet Lane and an adjoining permissive footpath. In particular, it recognised that increasing hedgerow heights to screen the development could itself create an unacceptable sense of enclosure. The Applicant subsequently removed the arrays from that field, a change recorded in the Secretary of State's decision letter of 8 October 2026.

MFPC recognises that Green Hill was consented and does not suggest that the circumstances of field AF29 are identical to those at East Pye. Nevertheless, it demonstrates the importance of

examining whether screening adequately mitigates landscape harm or introduces additional harm through the loss of openness.

In light of South Norfolk District Council's specific findings concerning Site 5, MFPC asks the Examining Authority to examine whether the proposed layout and mitigation sufficiently address these effects, or whether targeted changes to the arrangement, extent or height of solar arrays and associated infrastructure are necessary. MFPC considers that these questions require a site-specific response rather than reliance solely on the anticipated maturity of planting.

Water assessment drainage and the seasonal stream

MFPC-PDA-007 asked about groundwater, private water supplies, private sewage systems and the adequacy of the receptor information. EPS refers to earlier WAT and GRO thematic responses. That identifies its position, but the response itself does not show how the local water features and supplies are covered. The Council's Deadline 1 Written Statement now supplies further detail in Chapter 9 and Chapter 16. We request a focused answer to that evidence at the next stage. [E1, MFPC-PDA-007; M1]

The revised WFD Assessment adds cross references to the Ground Conditions Assessment, including at paragraphs 1.4.1, 2.2.3 and 2.5.9. Neither of the two properties with private water supplies adjacent to Site 5 are named in that WFD text. The statement about no recorded private abstractions within the Order Limits does not determine whether neighbouring supplies outside that boundary are adequately assessed. The stated Well reference does not correspond to the location of the shallow well that is used for all water supplies at one of the properties. MFPC asks EPS to identify the assessment entry for each supply, the source information used and the conclusions on water quality, reliability and possible changes to flow. This is a request for a clear account of the assessment, not an assertion that the Applicant has never referred to either property elsewhere. [E8; M1, section 9.4]

The request should distinguish existing ground contamination from pollution introduced during construction, sediment, drainage alterations, dewatering where proposed, and changes to groundwater movement or recharge. In Q1.16.1 and Q1.16.2, EPS supports its conclusions and the deferral of intrusive investigation largely by reference to its preliminary contamination risk assessment, the history of agricultural use and embedded mitigation. Those matters are relevant, but a low risk of existing contamination does not by itself establish that foundations, trenches or drainage works will leave groundwater movement and private supply reliability unaffected. With the proposed access point A23 for the AILs next to the tunneled stream that passes through one of the properties and the need for that stream to be bridged in order to get the AIL's to the construction point within Site 5, the risks of contamination are vastly different to the current status. EPS should explain separately how the assessment covers those physical effects at Site 5A, given the permitted foundation depths, and identify what is established now and what must be investigated before the relevant works. [E4, Q1.16.1–Q1.16.2, printed pages 220–230; E5, Table 4.3; E8; M1, Chapters 9 and 16]

The western Site 5A stream described in MFPC's Written Statement requires a specific response. The revised FRA refers to watercourse corridors at Site 5A, while WFD paragraphs 2.4.8–2.4.9 describe a tributary beside Site 5B and CRC6. That description does not clearly identify the western stream or explain its seasonal behaviour. MFPC does not assert that EPS has recognised no watercourse at Site 5A. We ask it to identify this stream on a plan, state its classification and assessment reference, and explain the evidence on seasonal flow, any groundwater contribution

and the downstream route through the B1527 culvert, Boyland estate and its joining up with the River Tas. Chapter 9 of MFPC's Written Statement provides more evidence as to the stream in the Western section of Site 5, its flow path and status as a stream rather than a field ditch. [E8; E9, paragraph 3.3.3; M1, section 9.1]

The revised FRA contains substantive additional drainage information. EPS's ExQ1 response identifies modelling of substation attenuation and Site 5A access swales. Table 9.4 of the revised FRA gives an indicative 3.5 hectare impermeable area for the Site 5A 400 kV substation, discharge at 8.8 litres per second and attenuation of 5,291 cubic metres. MFPC acknowledges that modelling has been provided. The question that remains is whether the proposed storage, treatment, outfall and exceedance routes are feasible within the actual layout and protect neighbouring land during construction as well as operation. The recent sudden rainfall experienced this week resulted in flash flooding on the B1527 demonstrating that this area is already susceptible [E4, water environment responses, printed pages 216–217; E9, Table 9.4]

The ExQ1 answers confirm that important drainage assumptions remain unsettled. In Q1.15.1, EPS says infiltration within the diamicton is likely to be very limited. It records the LLFA's advice that preliminary testing should include one or two tests per field or area, while EPS is considering more limited targeted testing and developing a discharge to watercourse alternative. In Q1.15.2, EPS confirms that the final number of drainage layouts, discharge locations and hydraulic calculations cannot yet be verified. MFPC therefore asks for a demonstrably feasible Site 5 arrangement if infiltration proves unsuitable, identifying receiving watercourses, downstream constraints, required land and storage space, and the protections needed during construction. [E4, Q1.15.1–Q1.15.2, printed pages 214–219; O1, paragraphs 9.14–9.25]

Private sewage treatment and septic drainage were also within MFPC's original question. The response should identify any such systems potentially affected by works, drainage changes or alterations to receiving ditches, and the relevant protection. For water supplies, arrangements should cover baseline checks, monitoring, prompt investigation and continuity of a usable supply where project works cause harm. These are specific safeguards for identified risks, not a request to defer all consideration until a resident reports a problem. [E1, MFPC-PDA-007; M1, Chapters 9 and 16]

The drainage responses also contain an apparent inconsistency in site references. Q1.15.1 identifies new modelling for the Site 5A substation and Site 5A access track, whereas Q1.15.2 refers to a substation in Site 5B and an access track in Site 4B. These may be drafting errors or references to different elements. EPS should clarify the locations and identify the corresponding drawings and calculations so that the Council and residents can check which works and outfalls have actually been modelled. [E4, printed pages 216–218]

Ecology and reliance on later investigation

MFPC-PDA-008 refers back to an earlier ecology response, while VC-012 summarises conclusions of no significant adverse effects and significant benefits for some habitats in operation. MFPC recognises that proposed habitat creation may have benefits. Those benefits do not, without an explanation, answer the risk to an existing sensitive habitat or the interruption of a route used by wildlife during construction. Chapter 8 of the Council's Deadline 1 Written Statement supplies its detailed local evidence for the next response. [E1; E2; M1]

Norfolk Wildlife Trust's evidence on Fritton Grange Meadows is particularly relevant. It welcomes the proposed stand off and acknowledges drilling proposals, but questions whether sufficient evidence shows that the lowland fen's supporting water conditions will be protected. It

identifies the dependence on later feasibility work and a hydrogeological risk assessment "if required". MFPC asks EPS to explain what determines whether that assessment is required, who decides, and what evidence demonstrates that the proposed crossing is feasible without unacceptable effects on the fen. [O4, County Wildlife Sites discussion]

A proposed drilling depth and a buffer are design measures; their adequacy depends on the conditions and method. EPS should identify the information needed to confirm those assumptions and the response if drilling cannot proceed as anticipated. Any alternative method must also be shown to be acceptable. This concern connects directly to the Council's earlier question about ecological and water constraints being properly considered when selecting and designing the development. [E1, MFPC-PDA-007, 008 and 017]

For hedgerows and bat routes, MFPC requests a coordinated account of removals and gaps needed for access, abnormal loads, cable works and visibility, with the period of interruption and restoration measures. NWT's comments on habitat connectivity and NCC's concern about unquantified vegetation works reinforce this request. A future overall increase in planting does not demonstrate that each affected movement route remains functional while works take place. EPS should explain how those periods are covered by its conclusions. [O4; O1, paragraphs 6.22–6.25; M1, Chapter 8]

Combined effects, wellbeing and access to information

MFPC-PDA-009, 010, 014 and 017 and OFH2 VC-008 and VC-012 raised the combined burden on the community. EPS refers to its technical assessments and Human Health Summary Statement, but the local picture remains unclear. MFPC asks how overlapping and successive effects on the same households, facilities and routes have been assessed. Several effects described separately as temporary, minor or negligible may create a substantial burden when experienced together over months or years. MFPC's Deadline 1 Written Statement, particularly Chapters 18–19, provides further local evidence for consideration. [E1; E2; M1]

The Mental Health and Wellbeing Addendum strengthens the basis for this concern. It acknowledges significant environmental effects, unequal exposure and credible links between wellbeing and tranquillity, familiar landscapes, access to nature and enjoyment of homes and gardens. It also recognises that individual and neurodivergent experiences may not be fully reflected in population assessments. These acknowledgements require more than a general conclusion of non-significance. EPS should explain how it has assessed the possibility of substantial effects concentrated within a small community or sensitive group, including around Site 5. [E7, paragraphs 5.3.37–5.3.42 and 6.1.1; M1, Chapters 18–19]

Identifying vulnerable groups does not demonstrate that the proposed mitigation will meet their needs. Older people, children, disabled and neurodivergent people, carers and those without private transport may depend particularly on familiar routines, quiet surroundings and nearby routes. The Addendum acknowledges that keeping a public right of way legally available does not necessarily preserve its character or recreational value. MFPC asks whether retained or diverted routes will remain practically accessible, safe and suitable for those who use them for exercise, social contact or relief from stress. Its Written Statement provides the detailed local route evidence and concerns. [E7; M1, Chapter 11, Appendix 1 and Chapters 18–19]

The conclusion also depends on mitigation whose local effectiveness remains to be demonstrated, including maturing planting, traffic arrangements and detailed noise controls. In Q1.6.1, EPS recognises that a health conclusion may differ from the significance finding in a technical chapter; Q1.6.2 identifies further operational noise mitigation. MFPC asks how that distinction has been

applied to the most exposed households and what action will follow if the measures do not adequately protect them. Wider climate and employment benefits should not be assumed to offset persistent local losses experienced by different people. [E4, Q1.6.1–Q1.6.2, printed pages 120–126; E7]

Liaison and complaints procedures are useful, but an absence of complaints would not establish an absence of harm. People may disengage, lack confidence or find the process inaccessible. EPS should provide proactive contact, written notices, telephone and postal options, a named contact and clear escalation arrangements. Monitoring should consider changes in route use, access and enjoyment as well as complaints, with practical responses to recurring problems. MFPC seeks effective mitigation and communication; The Council asks how that recognition will change delivery for affected households. The Addendum principally brings together existing commitments and proposes review through liaison, monitoring and complaints. EPS should identify the practical arrangements for giving notice of disruptive work, considering particular needs, recording agreed adjustments and acting where a household experiences a combination of effects that the separate assessments have not adequately captured. The Council is seeking appropriate construction and communication arrangements, not clinical services. [E7, paragraphs 6.1.3–6.1.5 and section 7; O1; M1, Chapters 18–19]

EPS's reliance in VC-012 on pre-application consultation and acceptance of the application does not answer present barriers to participation. Residents must still navigate extensive technical material within short deadlines, often alongside other commitments or with limited digital skills. Accessible participation must continue throughout examination and construction. Technical reassurance should also address understandable concerns about safety and loss of control, which the Addendum recognises as wellbeing pathways even where the assessed physical risk is low. [E2; E7; section 1 above]

For electromagnetic fields, Q1.6.3 provides cable values and separation assumptions. MFPC requests a clear explanation linking the conclusions to the permitted Site 5 equipment, cable arrangements, loading assumptions and receptor locations, distinguishing cable evidence from that for the substation and other equipment. The Council seeks verifiable design assurance and understandable communication. Its central concern remains that a population-level finding of non-significance does not, without further explanation, resolve the potential for substantial and sustained effects on the households most exposed. [E4, Q1.6.3, printed pages 126–127; E7]

Making the protections dependable

The revised draft DCO already contains approval mechanisms for detailed design, drainage, environmental management and traffic. MFPC is not asking the examination to overlook those mechanisms. It asks whether the content and timing of the controls are sufficient to make the conclusions relied upon by EPS dependable. Where an effect is said to be negligible because a particular limit or management measure applies, that measure should be identifiable in a binding document. [E10, Requirements 5 and 11–16]

This is particularly important for permitted preliminary works. Requirement 13(1) refers to a preliminary works environmental management plan, while the definition of commencement excludes permitted preliminary works. EPS's covering letter says the plan was not submitted at Deadline 1 and is intended for Deadline 2 as a final form plan to be secured under the DCO. MFPC cannot review that plan in this response to the 14 October documents. We request adequate time after publication to examine the activities it permits and the water, ecology, traffic and residential protections applying before the main construction approvals. [E10; E11]

For later investigations, EPS should identify the question to be answered, the possible consequences for design, who approves the outcome and the point beyond which work cannot proceed without that approval. If a possible result could make the proposed method or layout unacceptable, the examination needs enough evidence about the alternative to judge whether consent can safely leave that detail outstanding. Routine implementation details can follow consent within a properly assessed and bounded scheme.

The drafting also needs to be consistent. Requirement 14 concerns operational environmental management, but paragraph (2) refers to approving the construction environmental management plan. The intended consultation duty should be corrected or explained. Similarly, the evening noise commitments should be linked to the correct document, version and limits. These are practical points for residents and the authorities responsible for checking compliance. [E10, Requirement 14; E6, paragraph 1.7.7]

MFPC requests one response schedule recording each outstanding Council question, EPS's answer, the evidence relied upon and the document and approval that secure the proposed protection. It should distinguish matters resolved by clarification, matters still disputed and matters dependent on future information. The principal outstanding actions are: justification of the Site 5 layout; a binding compound restriction and local programme; reconciled traffic routes and accesses; a property and noise receptor explanation; the watercourse and supply assessment; a response to the specific landscape and habitat evidence; and controls applying before potentially harmful works begin.

MFPC recognises the renewable electricity benefits advanced for the scheme. Those benefits do not answer the detailed questions raised here about the scale and distribution of local harm or the reliability of mitigation. The Council maintains its objection and the request for refusal in its Deadline 1 Written Statement, subject to the clarifications made in this response. We ask the Examining Authority to test the conclusions against the evidence and to give proper weight to harm and uncertainty that remain. Requests for safeguards do not signify support for the application.

References

These references identify the material used. E references are EPS documents published on 14 October 2026; O references are organisational evidence published in that batch. The latter may address earlier versions of the Applicant's documents. M1 is the contemporaneous MFPC Deadline 1 Written Statement

P1 EN0110014-000279
Examination Library dated 2 October 2026. Deadline 1 entries checked on 17 October 2026 before individual references were available.
M1 MFPC Deadline 1 Written Statement
Supplied as MFPC Written Statement.pdf. Chapter and Appendix references in this submission refer to that document.
M2 EN0110014-000456
MFPC Rule 6 response requesting scrutiny and participation at ISH1, identified as PDA-035 in EPS's response table.
M3 EN0110014-000457
MFPC Rule 6 response requesting additional site inspections, with accompanying map.
E1 EN0110014-001360
EXAM/9.22 Applicant's Responses to Procedural Deadline A and Additional Submissions.
E2 EN0110014-001359
EXAM/9.19 OFH2 written summary and Applicant's responses.
E3 EN0110014-001357
EXAM/9.17 ISH1 written summary and response to action points.
E4 EN0110014-001403
EXAM/9.2 Applicant's responses to ExQ1.
E5 EN0110014-001311
APP/7.18 Design Principles, Parameters and Commitments, Revision 2, clean.
E6 EN0110014-001337
EXAM/9.20 Evening Noise Assessment.
E7 EN0110014-001371
EXAM/9.27 Mental Health and Wellbeing Addendum.
E8 EN0110014-001369
ES Appendix 9.2 WFD Assessment, Revision 2, clean.

E9 EN0110014-001376 and EN0110014-001375
ES Appendix 9.1 FRA and Outline Surface Water Drainage Strategy, Revision 3. Clean Part 1
E10 EN0110014-001298
Draft Development Consent Order, Revision 3, clean.
E11 EN0110014-001338
EXAM/9.23 Applicant's Deadline 1 covering letter.
E12 EN0110014-001297
APP/2.8 Waterbodies River Basin Management Plan, Revision B.
O1 EN0110014-001412
Norfolk County Council Local Impact Report.
O2 EN0110014-001448
South Norfolk District Council Local Impact Report.
O3 EN0110014-001205
Environment Agency Deadline 1 response to PDA-009.
O4 EN0110014-001507
Norfolk Wildlife Trust written representation.
O5 EN0110014-001508
National Gas Transmission written representation dated 6 October 2026.

AI Disclaimer
OpenAI ChatGPT was used to assist Morningthorpe and Fritton Parish Council (MFPC) in reviewing, comparing and summarising published East Pye Solar examination documents, including the Applicant's responses and other submissions, and in structuring, drafting and editing this Deadline 2 submission.
The source material comprised published examination documents, MFPC's previous representations and information provided by the Council. AI was not used to create new factual evidence.
MFPC has reviewed the final submission, checked factual statements and references against original sources, and accepts full responsibility for its accuracy, content and conclusions.