Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b)

PINS Reference: EN0110014

FULL DETAILED SUBMISSION VERSION

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Preface

The document is the result of many of hours of work. This has included reviewing technical documents, walking the site and surrounding Public Rights of Way, gathering evidence, analysing policy, and carefully preparing a structured and detailed submission. It represents a significant community-led effort to engage constructively and meaningfully with the examination process.

Artificial intelligence tools have been used throughout to support the drafting, structuring, and refinement of this report. These tools have assisted in organising information, improving clarity, and ensuring consistency across a large and complex body of material. However, the content, conclusions, and judgment within this document are grounded in human input. The issues raised, the evidence relied upon, and the concerns expressed originate from the community itself.

The images included in this objection are for contextual illustration only and have not been prepared to formal LVIA standards.

This is not a generic or automated submission. It is a place-based document, informed by local knowledge, lived experience, and careful consideration of the Environmental Statement and relevant policy framework.

The intention of this report is to assist the Examining Authority by providing a clear, evidence-based, and site-specific assessment of the effects of the Proposed Development at Sites 8a and 8b. It is submitted respectfully and in the spirit of constructive engagement, with the aim of ensuring that decisions are made based on complete, accurate, and locally informed evidence.

Executive Summary

This submission provides a detailed objection to the inclusion of Sites 8a and 8b in the East Pye Solar Proposed Development at Shotesham all Saints (PINS Ref EN011014). It draws on the full assessment of environmental, ecological, hydrological, heritage, landscape, transport, and agricultural impacts presented in the objection.

1. Introduction

- The objection is based on robust technical evidence showing that Sites 8a and 8b:
- Are environmentally sensitive
- Are infrastructure-constrained
- Pose risks to protected species, habitats, soils, water, and heritage assets

The proposals would result in significant and irreversible harm and are not required to meet the development's objectives.

2. The Proposal

The application seeks consent for a solar energy and battery storage project comprising multiple site allocations including the focus of this document:
Site 8a – north of Market Lane
Site 8b – north of Market Lane continuation

Development includes solar arrays, access tracks, landscaping, and associated infrastructure.

3. Summary of Key Issues

Ecology & Biodiversity

- Sites support barbastelle bats and other protected species
- Habitat networks, hedgerows, and field margins provide connectivity
- Baseline surveys are incomplete, and proposed mitigation is uncertain

Water Environment & Hydrology

- Increased surface water runoff, flood risk, and impacts on private water supplies
- Limited baseline data and potential downstream impacts are uncertain

Soils & Agricultural Land

- Sites include Grade 1 and 2 agricultural land
- Construction would cause compaction, reduce infiltration, and degrade productive soils

Heritage & Landscape

- Sites affect listed buildings and the setting of heritage assets
- Substantial landscape change and long-term visual harm anticipated

Public Rights of Way

- Loss, severance, or diversion of well-used public rights of way
- Recreational connectivity would be harmed

Transport & Access

- Market Lane is single-track, flood-prone, and unsuitable for HGVs or abnormal loads
- Traffic control measures would create delays and operational risks

EIA & Assessment Deficiencies

- Environmental Statement relies on assumptions, incomplete surveys, and deferred mitigation
- Key evidence gaps reduce confidence in predicted effects and mitigation

4. Planning Policy Context

- The allocation of Sites 8a and 8b is inconsistent with:
  EN-1 (National Policy Statement for Energy)
- EN-3 (NPS for Renewable Energy)
- NPPF and relevant Norfolk policies protecting biodiversity, water, soils, and landscape

The proposals fail tests of sustainability, deliverability, and soundness.

5. Alternatives

- Less harmful sites and alternative access routes exist
- These alternatives have not been properly assessed
- Sites 8a and 8b are not essential to achieve the development objectives

6. Conclusion

- Sites 8a and 8b are unnecessary and disproportionately harmful
- Excluding them would reduce environmental, social, and transport impacts without affecting overall project deliverability
- Recommendation: Sites 8a and 8b should be removed from the Order Limits

INTRODUCTION AND CONTEXT

Chapter 1. Introduction

1.1 Purpose of this Document

This document sets out a detailed, site-specific objection to the inclusion of Sites 8a and 8b (Site 8) within the proposed East Pye Solar development.

The principle of renewable energy development is recognised and supported. However, national policy requires that such development is appropriately sited and that adverse impacts do not outweigh its benefits.

The key issue addressed in this document is therefore:

Whether the inclusion of Site 8 is necessary and justified, having regard to its impacts and the availability of less harmful alternatives.

This submission demonstrates that:

- Site 8 is not required to deliver the scheme
- It gives rise to significant, wide-ranging, and in some cases uncertain harm
- These impacts have not been fully assessed and cannot be effectively mitigated

Accordingly, the evidence supports a clear and proportionate outcome:

The removal of Sites 8a and 8b from the Order Limits of the Proposed Development.

This objection has been prepared to assist the Examining Authority in its consideration of the application as a Nationally Significant Infrastructure Project (NSIP), and is supported by the evidence set out in the chapters that follow.

1.2 The Proposed Development

The East Pye Solar project comprises a large-scale solar energy development across multiple sites.

It includes:

- Solar photovoltaic arrays
- Associated infrastructure, including inverters and substations
- Battery Energy Storage Systems (BESS)
- Cable routes connecting different parts of the scheme

This document focuses specifically on Sites 8a and 8b, which are proposed to accommodate solar arrays and associated infrastructure.

While the generation of renewable energy is recognised as an important national objective, this does not remove the requirement for development to be appropriately located and designed, and to avoid unacceptable environmental and landscape impacts.

1.3 Scope of the Objection

This objection considers a range of issues relevant to the assessment of the Proposed Development, including:

- The adequacy of the Environmental Impact Assessment (EIA)
- The process of site selection and consideration of alternatives
- Environmental effects, including ecology, water, soils, and landscape
- Effects on heritage assets and their setting

- Impacts on local amenity, including Public Rights of Way and visual effects
- Transport and access considerations
- Planning policy and the overall planning balance

The focus of the assessment is on the specific characteristics and sensitivities of Sites 8a and 8b and their relationship to the surrounding area.

1.4 Structure of this Submission

This document is structured as follows:

- **Introduction and Context**
  Provides background on the site and its sensitivity
- **Fundamental flaws**
  Examines deficiencies in the Environmental Impact Assessment and limitations in the consideration of alternatives
- **Environmental impacts**
  Assesses environmental, heritage, amenity, and transport impacts
- **Heritage and landscape**
  Assesses the impact on heritage buildings and landscape
- **People and amenity**
  Examines the impact on people who live and visit the area
- **Planning conclusion**
  Summarises key findings and conclusions

Each chapter identifies baseline conditions, assesses effects, considers policy compliance, and reaches a clear conclusion.

Chapter 2. Site Context

2.1 Relationship to Shotesham All Saints

Sites 8a and 8b extend to approximately 135 acres of agricultural land within the immediate rural setting of Shotesham All Saints.

Figure 2.1a: Shows Site 8 within the setting of the whole scheme

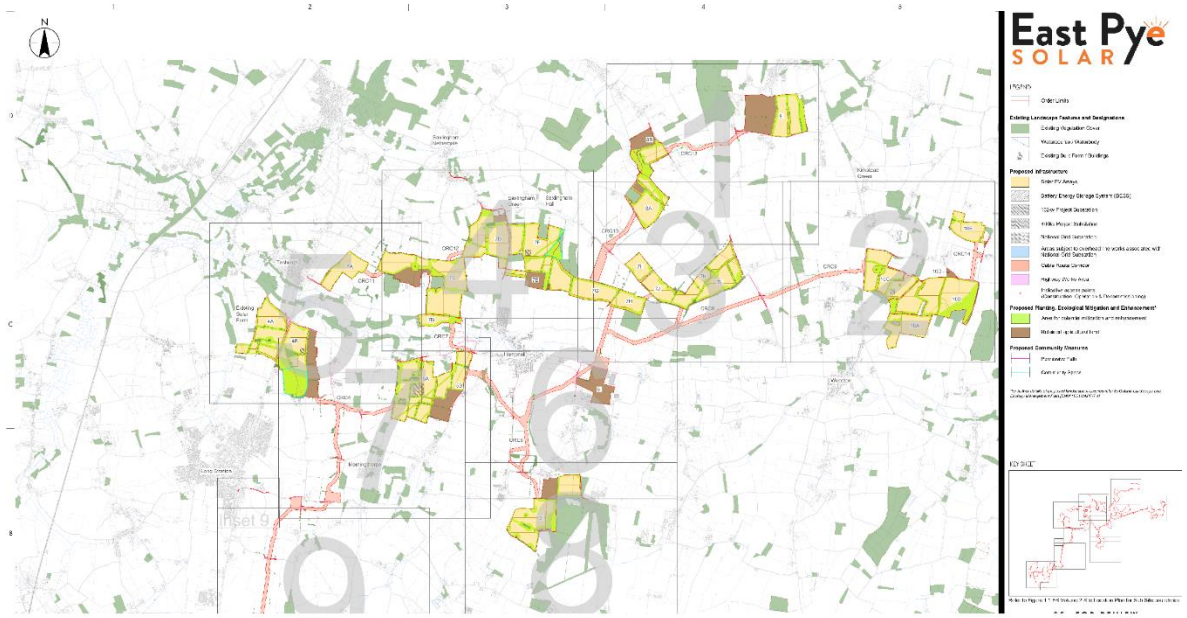
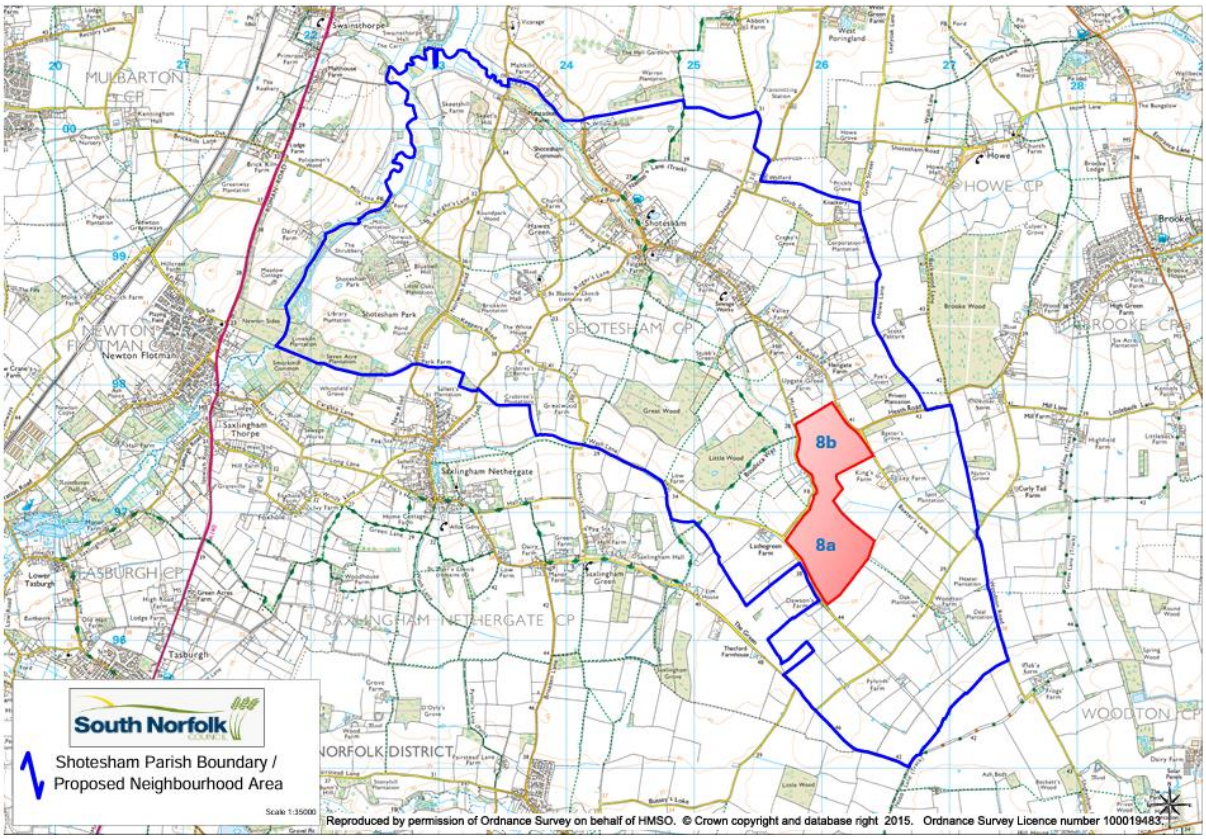


Figure 2.1b: Site 8 location and context within Shotesham parish



The village is situated within the Tas Valley and is characterised by an undulating agricultural landscape in which built form is closely integrated with the surrounding countryside.

This relationship is explicitly recognised in the Shotesham Conservation Area Character Appraisal (2018), which identifies the surrounding farmland as a key component of the village's significance.

Figure 2.1c: Shows Shotesham all Saint's Conservation Area

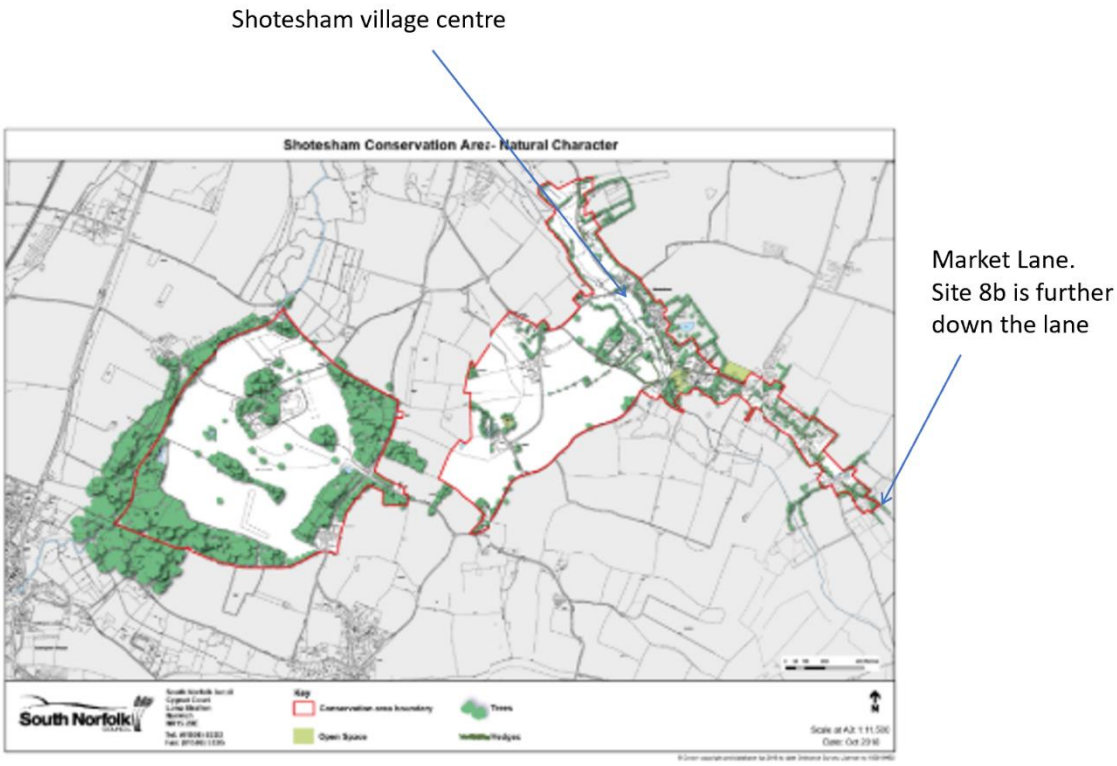


Figure 2.1d: Aerial view of Site 8b and it's proximity to Shotesham Conservation Area



Sites 8a and 8b lie within this landscape context and contribute directly to the rural backdrop of the settlement. The settlement pattern is dispersed, with a gradual transition between built form and countryside.

As a result:

- The distinction between village and landscape is not clearly defined
- The surrounding land forms part of the village's functional and perceptual extent

The sites are also experienced in relation to heritage assets within the village, including a number of listed buildings (including Upgate Farm, which looks directly over site 8b), whose setting relies on the surrounding open countryside.

The Conservation Area Appraisal identifies the importance of views into and out of the village, which enable appreciation of heritage assets within their wider landscape context. Sites 8a and 8b form part of this visual envelope.

Development within these sites would therefore be perceived as **encroachment into the village's immediate setting**, rather than development of visually contained or detached land.

In addition, the agricultural land reflects historic field patterns that contribute to the area's time-depth and rural identity.

The industrialisation of this land would erode this coherence and weaken the functional and perceptual relationship between the village and its surroundings.

Sites 8a and 8b should therefore be understood as forming an **integral component of the setting of Shotesham All Saints**.

2.2 Site Characteristics and Sensitivity

Sites 8a and 8b exhibit a combination of physical and environmental characteristics that give rise to a high level of sensitivity.

The sites:

- Slope toward a tributary of the River Tas
- Are visually prominent within the wider landscape
- Are readily experienced from Public Rights of Way
- Lie adjacent to ancient woodland
- Are located close to residential receptors and heritage assets

These overlapping sensitivities create a concentration of constraints within a relatively limited area.

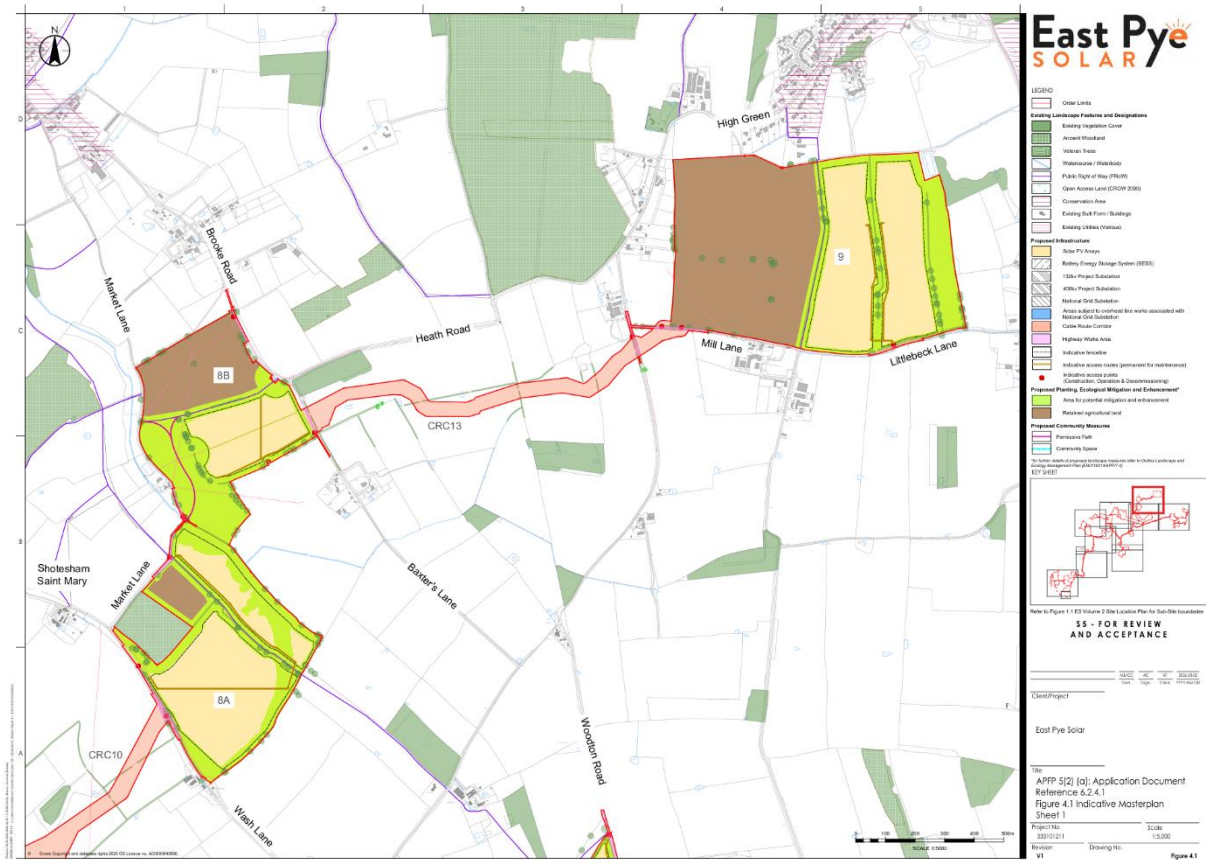
Taken together, the site demonstrates elevated sensitivity in relation to:

- Landscape character
- Visual amenity
- Ecology
- Hydrology
- The setting of heritage assets

2.3 Description of the Proposed Development (Site 8)

The Proposed Development at Site 8 comprises approximately 135 acres of agricultural land for the installation of solar arrays and associated infrastructure.

Figure 2.3a Shows East Pye Solar final plan for Site 8a and 8b



The layout includes:

- Solar panel arrays across multiple fields
- Associated infrastructure and cabling
- Connections to adjoining parts of the scheme

The layout is indicative only and subject to change through ongoing design development.

Indicative mitigation proposals include:

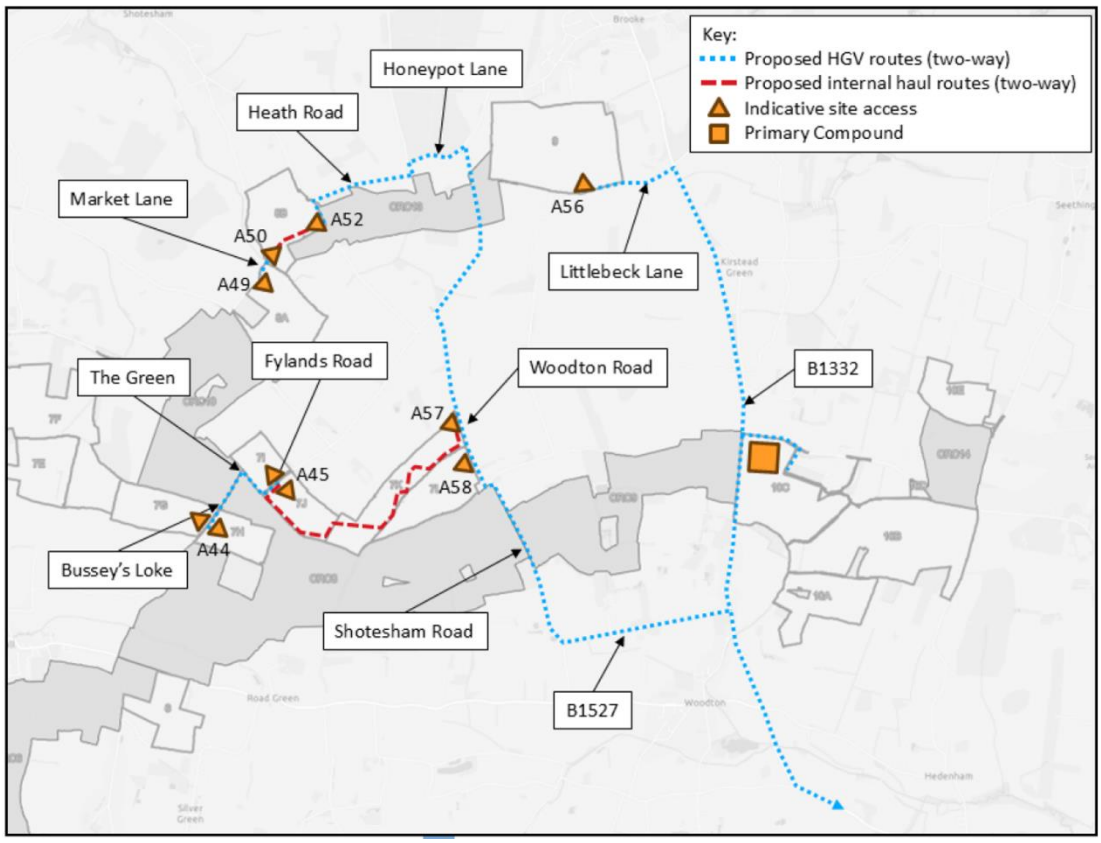
- Limited hedgerow planting
- Fragmented areas of additional vegetation

However, there is no evidence of a comprehensive or coherent strategy for:

- Landscape integration
- Habitat connectivity
- Long-term environmental management

Access arrangements also remain uncertain, with only indicative access points identified. Proposals have been made which currently will involve significant and uncertain figures for increases in traffic on narrow lanes, with poor visibility and few passing places.

Figure 2.3b: Access and movement plan



In the absence of detailed and fixed design information, confirmed details for the movement of site workers, etc which have been proposed to get to site independently, consideration of the number of trucks containing water for washing the panels and their route for accessing Site 8, the likely environmental effects cannot be reliably assessed.

2.4 Planning and Landscape Context

Sites 8a and 8b lie within a predominantly rural landscape characterised by agricultural land, dispersed settlement, and strong visual connectivity across the Tas Valley.

The sites are not allocated for development and form part of the countryside setting of Shotesham All Saints.

Relevant planning policy emphasises:

- Protection of rural character
- Conservation of landscape quality
- Safeguarding the setting of settlements and heritage assets

Given this context, particular weight must be given to the contribution of the sites to:

- The setting of the Conservation Area
- The maintenance of key views
- The openness of the surrounding landscape

2.5 Summary of Sensitivity

Sites 8a and 8b are subject to a combination of environmental constraints and sensitivities, including:

- **Ecological sensitivity**
  Presence of protected species and habitat networks
- **Hydrological sensitivity**
  Direct connectivity to the River Tas catchment
- **Soil sensitivity**
  Clay-rich soils vulnerable to compaction
- **Landscape sensitivity**
  High-value rural landscape with limited capacity for change
- **Heritage sensitivity**
  Contribution to the setting of the Conservation Area
- **Recreational sensitivity**
  Presence of Public Rights of Way and valued user experience
- **Access constraints**
  Limited and unsuitable rural road network

Taken together, these factors demonstrate that Site 8 is a **highly constrained and sensitive location**, where development would give rise to significant and interrelated environmental effects.

Fundamental flaws

Chapter 3. Environmental Impact Assessment Deficiencies

3.1 Chapter Summary

This chapter identifies **fundamental and systemic deficiencies** in the Environmental Impact Assessment (EIA) accompanying the Proposed Development, with specific reference to Sites 8a and 8b.

It demonstrates that:

- The assessment is inconsistent, high-level, and lacks methodological rigour
- Baseline data is incomplete across multiple disciplines
- The Environmental Statement relies heavily on assumed mitigation and post-consent controls
- The scheme is assessed using a flexible design envelope, introducing significant uncertainty
- Impacts are systematically underestimated through methodological assumptions
- Cumulative effects are not robustly assessed
- Key environmental information is deferred to post-consent stages

These are not isolated issues. They represent **a consistent pattern across the Environmental Statement**, which materially reduces confidence in its findings.

As a result, the Environmental Statement does not provide a **robust or reliable basis for decision-making**, and its conclusions should be afforded **limited weight**.

3.2 Policy Context

National policy requires that environmental information is **sufficient, robust, and available at the point of decision-making**.

In particular:

- **NPS EN-1 §§4.2–4.3** require adequate information to assess likely significant effects and clearly defined mitigation
- **NPS EN-1 §4.5** requires robust assessment of cumulative effects
- **NPS EN-3** requires site-specific assessment and proper consideration of environmental constraints

Where information is **uncertain, incomplete, or deferred**, decision-makers cannot be satisfied that impacts are acceptable.

3.3 EIA Failure Summary

The deficiencies identified are **systemic and cross-cutting**, affecting multiple topics and stages of the assessment. They are summarised in Table 5.1 below:

Table 5.1: Summary of EIA Deficiencies

Theme	Identified Issue	Implication for Assessment	Planning Consequence
Assessment Methodology	Inconsistent and, in places, high-level assessment; not all topics assessed using full EIA methodology	Reduces robustness and comparability across disciplines	Conclusions cannot be relied upon as a consistent evidence base
Baseline Data Gaps	Limited or incomplete surveys and investigations (e.g. ground conditions, ecology, archaeology)	Environmental receptors and constraints not fully understood	Likely significant effects cannot be accurately identified or assessed
Reliance on Mitigation	Heavy reliance on outline plans, embedded mitigation, and measures not secured in detail	Effectiveness of mitigation is uncertain and untested at this stage	Acceptability of impacts is not demonstrated at the point of decision
Design Uncertainty	Flexible “Rochdale Envelope” approach allowing variation in layout, siting, and infrastructure	Final scheme may differ materially from that assessed	Potential for impacts greater than those reported in the ES
Deferral to Post-Consent	Key elements (design detail, mitigation, investigations) deferred to future approvals	Environmental effects not fully understood at examination stage	Decision-making is based on incomplete information, contrary to EIA principles

Theme	Identified Issue	Implication for Assessment	Planning Consequence
Underestimation of Effects	Use of generic thresholds, modelling assumptions, averaging, and desk-based assessments	Does not reflect site-specific sensitivity or real-world receptor experience	Impacts are likely to be understated in the ES
Cumulative Effects	No robust standalone cumulative assessment; reliance on individual topic conclusions	Combined and interacting effects not properly assessed	Overall environmental impact of the scheme is underestimated

These issues are particularly significant for **Sites 8a and 8b**, where environmental sensitivity and receptor

Systematic Deficiencies in the EIA
The Environmental Impact Assessment demonstrates **multiple, systematic shortcomings**: incomplete baseline data for ecology, hydrology, and residential amenity; reliance on undefined mitigation measures; lack of worst-case scenario assessment; and inconsistent conclusions. These deficiencies collectively **fail to meet the requirements of the Infrastructure Planning (EIA) Regulations 2017** and National Policy Statement EN-1, undermining confidence that likely significant effects have been properly identified or assessed.

Proportional and Reasonable Alternative Exists
Evidence from the evolution of the East Pye Solar scheme shows that alternative configurations have been implemented successfully elsewhere. Given the minimal contribution of Sites 8a and 8b to overall generation, their **removal would not materially affect scheme delivery**, but would significantly reduce environmental, heritage, and amenity harm. A reasonable and proportionate outcome would therefore be the **exclusion of Sites 8a and 8b** from the Order Limits.

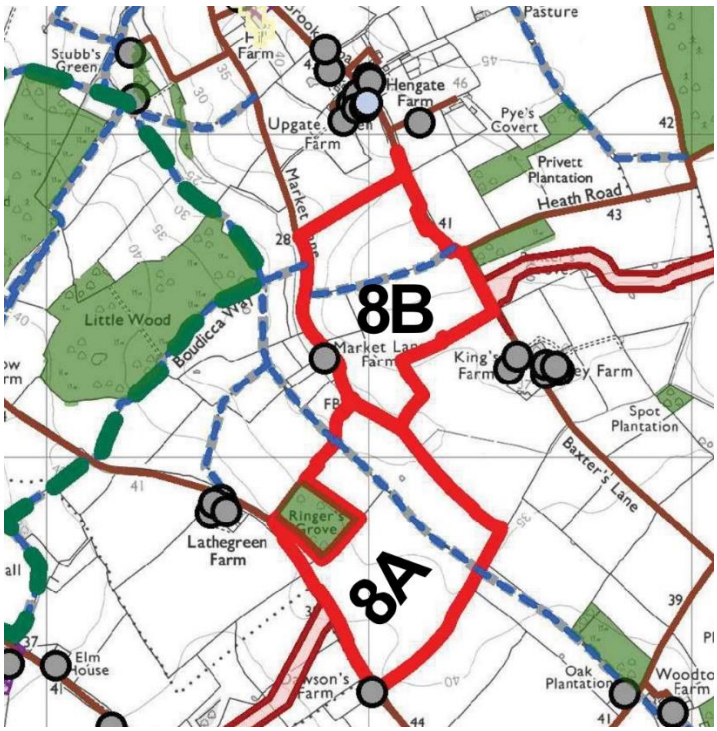
3.4 Residential Amenity Assessment Gaps

The PEIR does not provide an adequate assessment of residential amenity.

Key deficiencies include:

- No Residential Visual Amenity Assessment (RVAA)
- No assessment of private views
- No analysis of overbearing or oppressive effects
- No cumulative assessment of combined impacts

Figure 3.4a: The proximity of the development to residential receptors in the immediate vicinity of Site 8 is shown below:



A property-specific visual analysis would be required to assess the extent of overbearing effects.

Properties such as Market Lane Farm and Dawson's farm are directly adjacent to Site 8, and due to the undulating nature of the valley, other homes nearby are significantly impacted visually.

Residential Amenity – Fundamental Deficiencies

The Proposed Development is in extremely close proximity to Market Lane Farm and Dawson's Farm (less than 15 m from the site boundary), creating a high risk of significant adverse effects on residential amenity. The Applicant's LVIA explicitly excludes assessment of private views, relying solely on public viewpoints, which is inadequate at such distances. Public viewpoints cannot capture the static, prolonged, and highly sensitive nature of views from within homes and gardens.

Significant and "substantial" adverse effects have already been identified at Market Lane Farm from public viewpoints, indicating that actual impacts on residents are likely equal or greater. No Residential Visual Amenity Assessment (RVAA) or equivalent property-specific analysis has been undertaken to assess overbearing, oppressive, or dominating effects. This represents a clear failure to comply with EIA requirements to assess impacts on living conditions and human health.

Proposed mitigation through hedgerows and planting is insufficient. At less than 15 m, vegetation would take years to establish and remains seasonally and conditionally

unreliable. Even mature planting cannot prevent the development from appearing overbearing. The absence of a detailed planting strategy, Year 15 assessment, or management plan further undermines mitigation effectiveness.

Overall, the assessment is incomplete, methodology is not fit for purpose, and proposed mitigation is ineffective. The Examining Authority is requested to place substantial weight on these deficiencies and require a full RVAA and reassessment of residential amenity impacts. In the absence of such evidence, the EIA does not demonstrate that unacceptable harm to living conditions would be avoided.

3.5 Inadequate Baseline Data

The Environmental Statement is affected by **significant limitations in baseline information** across multiple topics.

Ground conditions

- Limited intrusive investigation
- Potential contamination risks unresolved
- Further investigation deferred to post-consent

Ecology

- Surveys described as “light touch”
- Limited assessment of behavioural patterns and habitat use
- Reliance on assumptions regarding species presence

Archaeology

- Partial survey coverage
- Limited trenching
- Potential for unidentified remains

In each case, the absence of robust baseline data means that:

- The magnitude of impact cannot be reliably assessed
- The effectiveness of mitigation cannot be demonstrated

This introduces **material uncertainty at the point of decision-making**.

3.6 Over-Reliance on Mitigation

The Environmental Statement relies extensively on:

- Outline management plans (including CEMP, OEMP, Soil Management Plan)
- Embedded mitigation
- Future approvals and detailed design

These measures:

- Lack detailed, secured commitments
- Are subject to future agreement
- Depend on implementation by unknown parties

This approach assumes that impacts can be controlled **post-consent**, rather than demonstrating that impacts are acceptable **at the point of determination**.

3.7 Flexible Design and Lack of Certainty

The Proposed Development is assessed using a **flexible design envelope**, rather than a defined scheme.

This results in:

- Uncertainty in layout and infrastructure placement
- Potential for impacts greater than those assessed
- Reduced reliability of assessment conclusions

For Sites 8a and 8b, where sensitivity is high and receptor exposure is significant, this lack of certainty undermines confidence in:

- Landscape and visual assessments
- Heritage impact assessment
- Amenity-related conclusions

3.8 Inconsistent and High-Level Assessment Approach

The Environmental Statement confirms that several topics have been assessed at a **high level**, without full application of EIA methodology.

This results in:

- Inconsistent assessment across disciplines
- Reduced evidential robustness
- Limited comparability between topics

In several cases, potential effects are identified but dismissed on the basis of **assumed mitigation**, rather than being properly assessed.

3.9 Underestimation of Effects

Across multiple topics, impacts are minimised through:

- Use of generic thresholds
- Averaging of data
- Assumed screening effects

Examples include:

- Glint and glare assessed on a desk-based basis without field validation
- Transport excluding operational effects and not reflecting rural sensitivity
- Noise relying on statistical averages with limited consideration of tranquillity
- Air quality applying generic thresholds

This approach does not adequately reflect **site-specific sensitivity or actual receptor experience**, and is likely to **understate the true scale of effects**.

3.10 Inadequate Assessment of Cumulative Effects

The Environmental Statement concludes that cumulative effects are not significant; however:

- There is no robust standalone cumulative assessment
- Conclusions rely on individual topic assessments
- Interactions between effects are not fully examined

This risks underestimating:

- Combined landscape and visual effects
- Cumulative pressure on environmental receptors

3.11 Deferral of Key Information

Key elements of the assessment are deferred to post-consent stages, including:

- Ground investigations
- Drainage design
- Soil management
- Ecological mitigation

As a result, the Examining Authority is not in a position to:

- Fully understand likely impacts
- Assess the effectiveness of mitigation
- Reach a properly informed conclusion

3.12 Site-Specific Implications for Sites 8a and 8b

These deficiencies are particularly significant for Sites 8a and 8b due to:

- Open and exposed landscape character
- High sensitivity of visual and residential receptors
- Agricultural land quality
- Hydrological and ecological connectivity

In this context:

- High-level assessment is insufficient
- Reliance on mitigation is inappropriate
- Design uncertainty materially affects conclusions

3.13 Summary of Effects

- Uncertainty in assessment of likely significant effects
- Incomplete understanding of baseline conditions
- Reliance on mitigation that is not secured or defined
- Underestimation of site-specific impacts
- Failure to assess cumulative effects robustly
- Deferral of key information to post-consent stages

3.14 Policy Conflict

The deficiencies identified result in conflict with:

- **NPS EN-1 §§4.2–4.5** (adequacy of evidence, mitigation, cumulative effects)
- **NPS EN-3** (site-specific assessment and environmental constraints)

The Environmental Statement does not provide the **level of certainty required for lawful and robust decision-making**.

3.15 Relationship with Alternatives and Design Evolution

The deficiencies identified in this chapter have a direct bearing on the assessment of **alternatives and design evolution** presented in Chapter 4.

In particular:

- The reliance on a **flexible design envelope** means that the scheme assessed is not fixed, limiting the ability to meaningfully compare alternatives
- The use of **high-level and inconsistent assessment methodology** reduces confidence that environmental constraints have been properly identified and applied to site selection
- The absence of **robust baseline data** means that key constraints—particularly ecological, hydrological, and heritage sensitivities—may not have been fully understood at the point alternatives were considered
- The reliance on **assumed mitigation** suggests that constraints have been managed rather than avoided through site selection and design

As a result, the process of alternatives assessment appears **reactive rather than plan-led**, with environmental constraints addressed through mitigation and design adjustments rather than forming the basis of site selection.

This undermines the conclusions of Chapter 4 and further demonstrates that:

- Sites 8a and 8b have not been shown to be the **least harmful or most appropriate locations**
- Less harmful alternatives may exist but have not been robustly assessed

Accordingly, the deficiencies in the Environmental Statement extend beyond technical assessment and **undermine the credibility of the alternatives and design evolution process as a whole**.

3.16 Conclusion

The Environmental Impact Assessment is affected by **systemic and cross-cutting deficiencies**, including:

- Inadequate baseline data
- Reliance on assumed and unsecured mitigation
- Flexible design and lack of certainty
- Inconsistent and high-level methodology
- Systematic underestimation of impacts
- Failure to robustly assess cumulative effects
- Deferral of key environmental information

Taken together, these issues demonstrate that the Environmental Statement does not present a **robust, transparent, or complete assessment of likely significant effects**.

For Sites 8a and 8b—where landscape sensitivity, receptor exposure, and environmental constraints are particularly high—these deficiencies are critical. They mean that:

- The **true scale of environmental effects remains uncertain**
- The **effectiveness of mitigation cannot be relied upon**
- The **assessment does not provide a sound basis for decision-making**

Accordingly, the Environmental Statement should be afforded **limited weight** in the planning balance.

These deficiencies materially weaken the Applicant's case and weigh **significantly against the granting of development consent** for Sites 8a and 8b.

Chapter 4. Alternatives and Site Selection

4.1 Chapter Summary

This chapter demonstrates that reasonable alternatives have not been properly or consistently considered in the evolution of the Proposed Development.

It shows that:

- The scheme has evolved elsewhere in response to environmental constraints
- Site 8 has not been subject to the same level of constraint-led design refinement
- Significant environmental and technical constraints affecting Site 8 remain unresolved
- The alternatives assessment lacks transparency and comparative analysis
- Site 8 makes only a limited contribution to the scheme but gives rise to disproportionate harm

Accordingly, the inclusion of Sites 8a and 8b is not justified, and their removal represents a reasonable and less harmful alternative.

4.2 Policy Context

National policy and EIA guidance require that reasonable alternatives are properly considered.

In particular:

- The **EIA Regulations 2017** require a description of reasonable alternatives and the reasons for the chosen option
- **NPS EN-1** requires good design and avoidance of environmental harm
- **NPS EN-3** requires proper consideration of environmental constraints in site selection
- The **sequential approach to flood risk** requires development to be directed to areas of lowest risk

Where alternatives are not properly assessed, it cannot be concluded that the chosen site represents the most appropriate option.

4.3 Evidence of Design Evolution Across the Scheme

Consultation material demonstrates that the scheme has undergone iterative design changes, including:

- Removal or reduction of sites
- Refinement of site boundaries
- Modification in response to environmental and technical constraints

Figure 4.3a: Comparative plan showing evolution of sites across the scheme

Site group	Type of change	Scale
Figure 6.1: Comparative plan showing evolution of sites across the scheme	Infrastructure + substation fixing	major
Site 3	Partial removal (3A)	major
Site 4-6	Buffer +minor layout refinement	moderate
Site 7	Large internal redesign	moderate
Site 8	edge reductions + repositioning	moderate
Site 9	minor refinement only	low
Site 10	Internal adjustments only	low

This indicates that alternative configurations are feasible and have been implemented.

4.4 Site-Specific Evolution at Site 8

Sites 8a and 8b have undergone limited design changes, including:

- Removal of fields within Site 8b
- Reduction of development near woodland in Site 8a
- Exclusion of panels from flood-prone areas

These changes demonstrate partial recognition of constraints. However:

- Amendments are limited and reactive
- Fundamental constraints remain unresolved
- The level of refinement is not comparable to other parts of the scheme

Key unresolved issues include:

- Flood risk and hydrological sensitivity
- Pollution risk to the River Tas
- Impacts on private water supplies
- Effects on protected species
- Proximity to designated sites and ancient woodland
- Landscape and heritage impacts
- Impacts on public rights of way and rural character
- Infrastructure and access constraints

There is limited evidence that consultation feedback has resulted in substantive redesign.

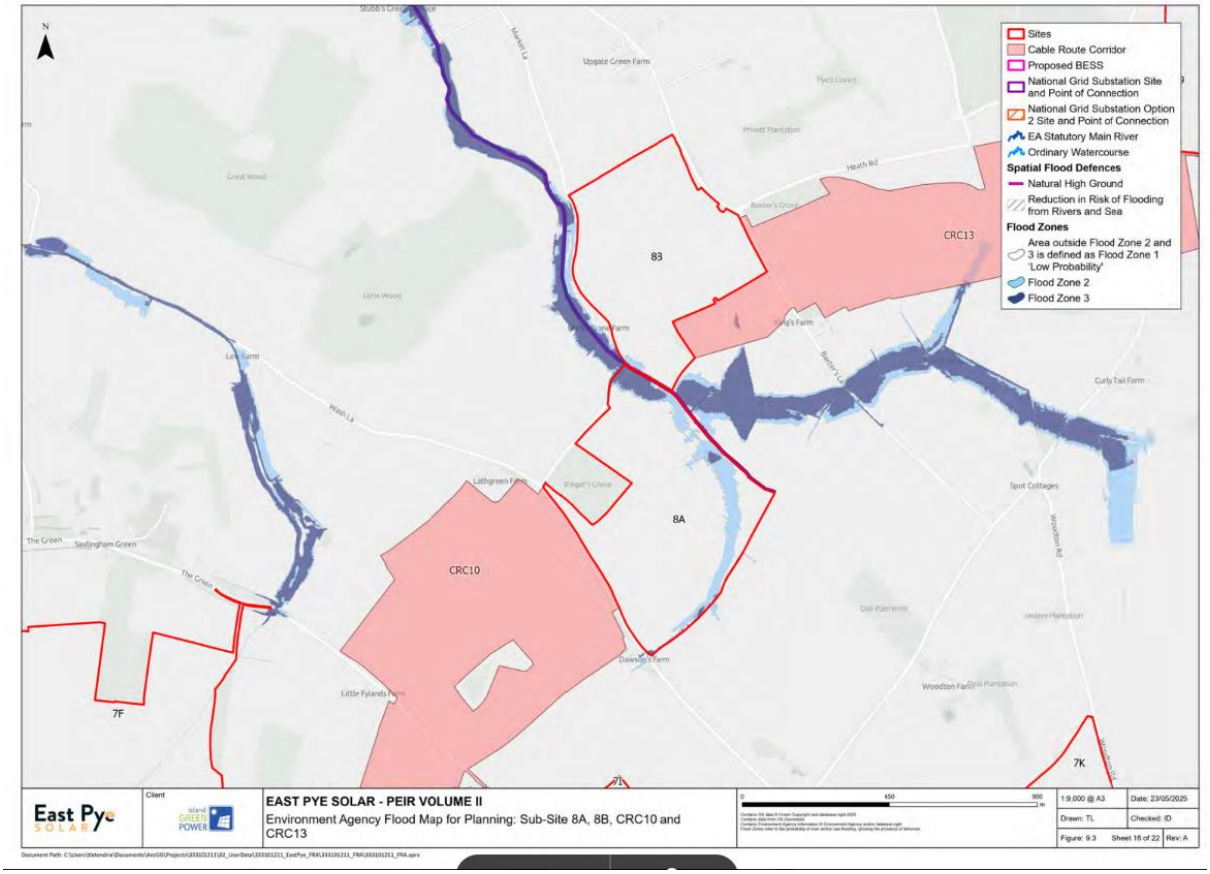
4.5 Site Constraints

Sites 8a and 8b are subject to multiple overlapping constraints.

The sites:

- Lie adjacent to a watercourse and associated floodplain corridor
- Form part of a natural surface water flow pathway
- Are hydrologically connected to the River Tas catchment

Figure 4.5a: Flood mapping and site topography



This map shows that part of Site 8a lies directly in Flood Zone 2 and 3. East Pye Solar have removed panels from that part of Site 8a. However, this seems quite purposeless, as it will do little to reduce any increase in the rate of flow of water from Site 8a and b, caused by the panels and water runoff patterns.

In addition:

- Cable routes would require crossings of the watercourse
- Development would introduce infrastructure into a sensitive river corridor

Landscape evidence identifies Site 8b as a highly sensitive landscape parcel, with limited potential for effective mitigation.

These constraints are comparable to those that have resulted in mitigation or site removal elsewhere in the scheme.

4.6 Flood Risk and Sequential Approach

Policy requires development to be directed to areas at lowest flood risk.

The South Norfolk Strategic Flood Risk Assessment states that:

- Development should avoid areas at risk where alternatives exist
- River corridors should be protected
- Built development should not normally occur within close proximity to watercourses

Given that:

- Site 8 lies adjacent to a floodplain corridor
- The landform directs runoff toward the watercourse

its inclusion is inconsistent with the sequential approach, particularly where alternatives have been identified elsewhere.

4.7 Proportionality of Site Contribution

Site 8 represents a small proportion of the overall scheme:

- Approximately 2.7% of solar panel and BESS area

Its removal would:

- Have negligible effect on overall generating capacity

However, the site gives rise to:

- High environmental sensitivity
- Multiple unresolved constraints
- Limited scope for effective mitigation

This creates a clear imbalance between limited benefit and significant harm.

4.8 Limitations of Alternatives Assessment

The alternatives assessment is limited and lacks transparency.

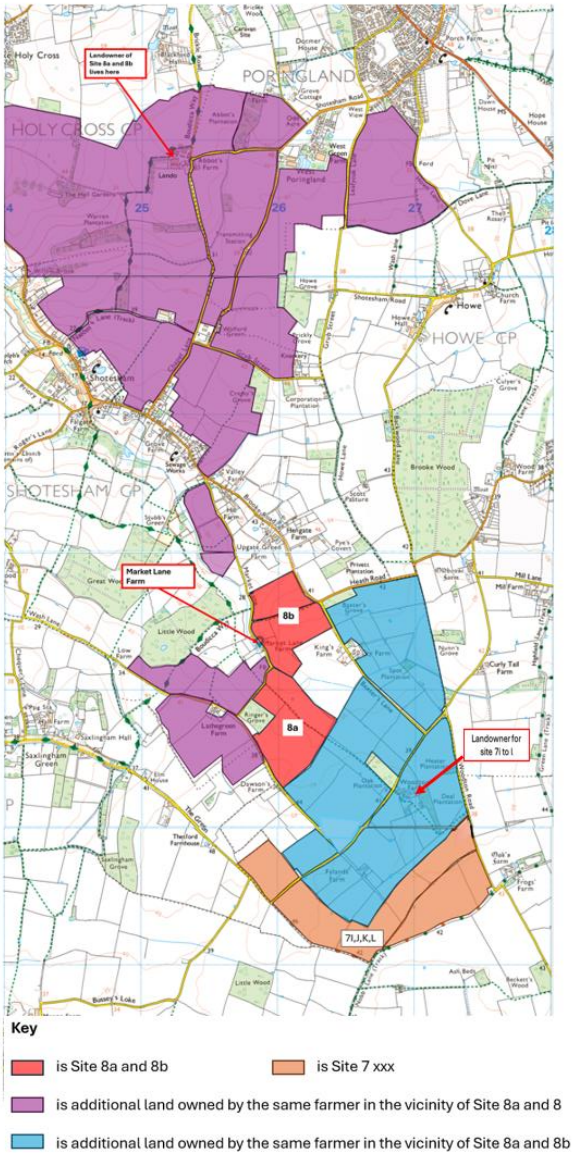
In particular:

- No clear comparison of alternative sites or layouts
- No systematic evaluation of environmental constraints
- Evidence of reactive, rather than constraint-led, design evolution

The Statement of Need provides a generic justification for renewable energy but does not demonstrate why Site 8 is required.

In the absence of a robust alternatives assessment, it cannot be concluded that Site 8 represents the least harmful or most appropriate option.

Figure 4.8a – Shows other sites that could potentially have been available instead of those in Site 8



This map shows fields within the vicinity of Site 8, which are owned by the same landowners who have chosen the fields they want to be used in the East Pye scheme.

Site 9 is also owned by the landowner of Site 8 and is in the next parish of Brooke.

Given the various constraints of Site 8, it seems very possible that other sites could have been identified and selected, that do not have the same issues as Site 8.

4.9 Assessment Deficiencies

The assessment of alternatives is affected by:

- Lack of comparative analysis between sites
- Absence of clear selection criteria
- Failure to demonstrate how constraints informed site selection
- Reliance on iterative reduction rather than strategic design

This limits confidence that environmental harm has been avoided or minimised.

Retention of Site Despite Constraints
The retention of Sites 8a and 8b despite known environmental, technical, and safety constraints — including high-pressure gas infrastructure, flood risk, and sensitive ecological features — **demonstrates a lack of proportionality and rational site selection**. Where similar constraints elsewhere in the scheme have led to site removal or modification, Sites 8a and 8b have been maintained, raising questions about the justification for their inclusion.

4.10 Summary of Effects

- Disproportionate environmental impact relative to limited contribution
- Inclusion of land affected by flood risk and hydrological constraints
- Failure to respond adequately to known environmental constraints
- Continued inclusion of a highly sensitive and constrained site
- Availability of less harmful alternatives

4.11 Policy Conflict

The inclusion of Site 8 conflicts with:

- **EIA Regulations 2017** (failure to properly assess reasonable alternatives)
- **NPS EN-1** (good design and environmental protection)
- **NPS EN-3** (consideration of environmental constraints)
- **Sequential approach to flood risk**

4.12 Conclusion

The evidence demonstrates that:

- The scheme has evolved elsewhere in response to constraints
- Site 8 has not been subject to equivalent design refinement
- Significant environmental constraints remain unresolved
- Alternatives have not been properly assessed

Given:

- The limited contribution of Site 8
- The availability of less harmful alternatives
- The scale of environmental constraints

the inclusion of Sites 8a and 8b is not justified, not proportionate, and not the result of a robust or policy-compliant alternatives assessment.

Their removal represents a reasonable, deliverable, and significantly less harmful alternative that would not materially affect the overall performance of the scheme.

Environmental Impacts

Chapter 5. Ecology and Biodiversity

5.1 Chapter Summary

This chapter demonstrates that Sites 8a and 8b form part of a highly sensitive and functionally connected ecological landscape supporting European Protected Species, priority habitats, and ecological networks linked to the River Tas catchment.

It shows that:

- The site lies within multiple Core Sustenance Zones of barbastelle maternity colonies, including a confirmed colony in close proximity
- The ecological assessment contains significant gaps in baseline data
- Impact pathways, particularly in relation to hydrological connectivity, are not fully assessed
- Effects on barbastelle bats, farmland birds, and aquatic species remain uncertain
- The legal tests under the Conservation of Habitats and Species Regulations 2017 cannot be met

As a result, there is a high risk of significant ecological harm, and compliance with policy and legal requirements has not been demonstrated.

5.2 Policy and Legal Context

Development affecting biodiversity must comply with:

- Conservation of Habitats and Species Regulations 2017
- NPS EN-1 §5.4
- National Planning Policy Framework

Under the Habitats Regulations, development affecting European Protected Species must demonstrate:

- No satisfactory alternative
- Imperative Reasons of Overriding Public Interest (IROPI)
- Maintenance of favourable conservation status

Where uncertainty exists, the precautionary principle applies.

5.3 Baseline Ecological Context

Sites 8a and 8b form part of a wider ecological network associated with:

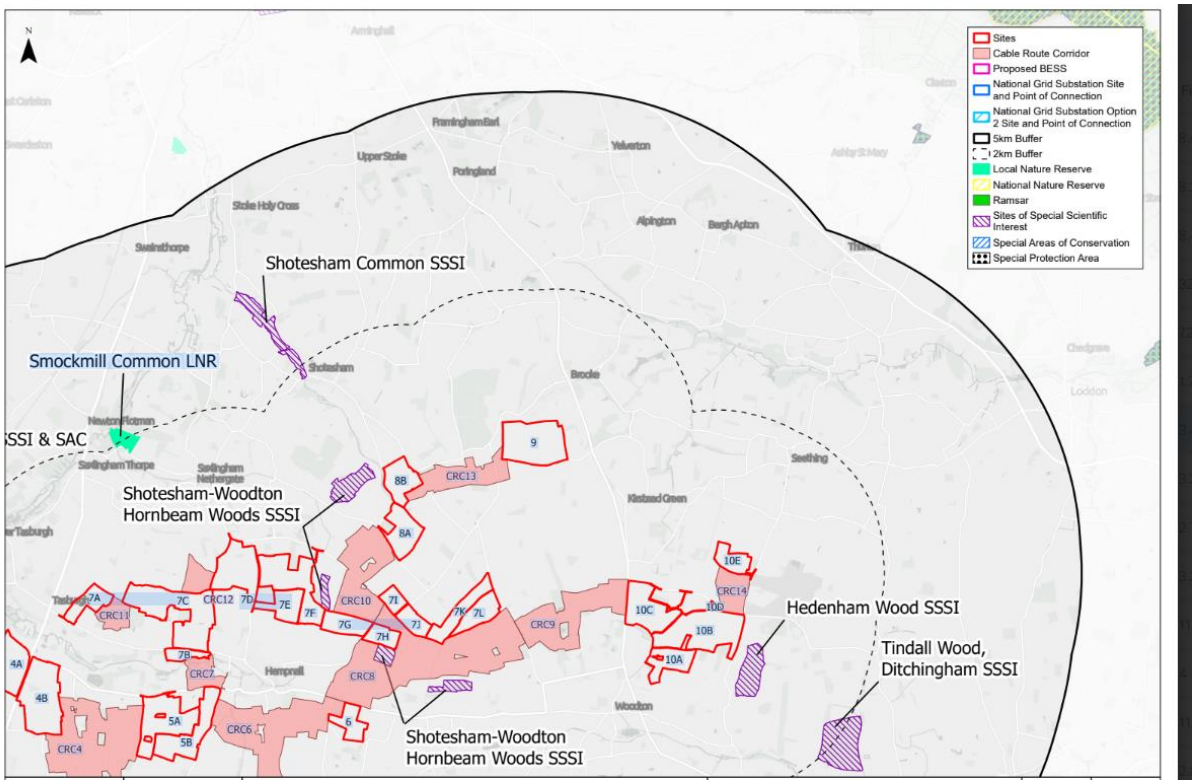
- Ancient woodland
- Farmland habitats
- The River Tas catchment

Habitats are functionally connected through:

- Hedgerows and field margins
- Woodland blocks
- Watercourses and drainage pathways

The site has direct hydrological connectivity to the River Tas catchment, providing clear pathways for effects to extend beyond the site boundary.

Figure 5.3a – shows important ecological areas within the area of Site 8.



The map shows Shotesham Common downstream of Site 8, which is a SSSI. In addition, there is a roadside reserve along the side of Market Lane, adjacent to Site 8a which is not marked on this map. Little Wood which is close to Site 8b is also a SSSI and is highly celebrated by conservationists because it represents one of the best remaining examples of ancient primary hornbeam forest in the region.

5.4 Barbastelle Bats (European Protected Species)

Baseline and Importance

The South Norfolk Claylands support maternity colonies of western barbastelle, a rare and highly sensitive European Protected Species.

- At least six Core Sustenance Zones intersect the scheme area
- Two colonies are located adjacent to the cable route
- A confirmed maternity colony lies in close proximity to Site 8b

Survey evidence confirms:

- Frequent activity within nearby woodland
- Identification of roost trees
- Presence of pregnant females
- A confirmed maternity colony (approximately 55 bats post-parturition)

This represents a large and regionally important population.

No studies have been carried out to ascertain whether Barbastelle bats also have a maternity roost in [redacted], adjacent to Site 8a.

Assessment of Effects

Barbastelles depend on:

- Connected woodland and hedgerow networks
- Dark, unlit landscapes
- Stable landscape structure

The Proposed Development would result in:

- Fragmentation of commuting and foraging habitat
- Disturbance during construction and operation
- Potential lighting effects
- Long-term alteration of landscape structure

Given the proximity of a maternity colony, these impacts are likely to be significant, and a European Protected Species Mitigation License will be required

Assessment Limitations

- Survey coverage is incomplete
- Woodland habitats are not fully assessed
- Flight corridors and habitat use are not adequately characterised
- No robust assessment of Core Sustenance Zone functionality

As a result, the scale of habitat use and the magnitude of impact are uncertain, and the effectiveness of mitigation cannot be demonstrated.

Habitats Regulations Compliance

The available evidence does not demonstrate that:

- Favourable conservation status would be maintained
- Less harmful alternatives have been ruled out (see Chapter 6)

Given the intrinsic sensitivity of the site, impacts cannot be fully mitigated through design.

5.5 Farmland Birds

Baseline

Site 8 supports a range of farmland bird species, including:

- Skylark
- Lapwing
- Yellowhammer
- Linnet
- Corn bunting
- Grey partridge
- Yellow wagtail
- Barn Owls
- Tawny Owls

These are predominantly red-listed Birds of Conservation Concern and Species of Principal Importance.

Historic data indicates up to 27 skylark territories across the site and surrounding area. Barn owls are also a protected species and have confirmed nesting sites in the surrounding areas.

Assessment of Effects

Ground-nesting birds are sensitive to:

- Habitat loss
- Disturbance
- Changes in vegetation structure

Solar development is known to displace species such as skylark. Barn owls are low-flying birds and will be vulnerable to high security fencing, particularly for recently fledged young.

Assessment Limitations

- No site-specific breeding bird surveys
- No territory mapping
- No multi-season survey data

As a result, population importance cannot be established, impacts are not quantified, and mitigation cannot be designed.

5.6 Farmland Mammals

Brown hares are common across the sites, and the security fences will prevent them from transversing the fields

5.7 Aquatic Ecology

Baseline

Site 8 drains into Shotesham Beck, a tributary of the River Tas.

Protected and priority species recorded within the connected network include:

- Otter
- Water vole
- White-clawed crayfish (confirmed breeding population)

These species are highly sensitive to sedimentation, pollution, and hydrological change.

Figure 5.7a – shows an image of a water vole taken in Shotesham Beck running Shotesham Common.



Both water voles and otters have been observed by members of the community in Shotesham Beck. In addition, water voles have also been observed at Market Lane Farm, adjacent to Site 8b.

Figure 5.7b – Image of a white-clawed crayfish



Norfolk is one of the few remaining strongholds for our largest aquatic invertebrate, the white-clawed crayfish. Forming a major part of the food chain and vital for a healthy functioning ecosystem, this creature was once widespread through our rivers. Sadly, pollution and invasive non-native signal crayfish have almost entirely wiped out this native species.

In recent times, surveys have revealed that the River Tas is one of a few rivers that are still home to the white-clawed crayfish. Although this is hugely encouraging, these native crayfish remain highly vulnerable. Therefore, it is vital that special care is taken to ensure that water quality is maintained for the survival of this remaining population.

Assessment of Effects

Hydrological connectivity creates clear pathways for:

- Sediment transport
- Pollution
- Downstream ecological effects

Assessment Limitations

- Impact pathways are not clearly assessed
- Effects on aquatic species are not quantified
- Licensing requirements are not addressed

The assessment does not establish that impacts can be avoided or effectively mitigated.

5.8 Habitat Networks and Landscape Function

Sites 8a and 8b form part of a wider ecological network comprising:

- Ancient woodland
- Hedgerows and field margins
- Verge habitats and roadside nature reserves

These features provide:

- Functional connectivity
- Ecological value
- Landscape structure

The Proposed Development would result in:

- Loss of hedgerows and trees
- Damage to verge habitats
- Fragmentation of ecological networks

These effects extend beyond the site boundary and affect the wider ecological system.

5.9 Cross-Cutting Assessment Limitations

The ecological assessment is affected by a number of cross-cutting limitations (see also Chapter 5), including:

- Incomplete bat surveys
- Absence of robust breeding bird data
- Limited assessment of aquatic species
- Inadequate evaluation of habitat connectivity

As a result, the assessment does not provide a reliable basis to determine the scale of ecological effects or the effectiveness of mitigation.

5.10 Summary of Effects

- Risk to barbastelle maternity colonies within Core Sustenance Zones
- Loss and disturbance of farmland bird habitat
- Potential downstream effects on aquatic species via hydrological pathways
- Fragmentation of ecological networks
- Uncertainty due to incomplete baseline evidence

5.11 Policy Conflict

The Proposed Development conflicts with:

- Conservation of Habitats and Species Regulations 2017
- NPS EN-1 §5.4
- National Planning Policy Framework
- Natural Environment and Communities Act 2006 and Biodiversity Duty

The available evidence does not demonstrate that adverse effects would be avoided or that favourable conservation status would be maintained.

5.12 Conclusion

Sites 8a and 8b form part of a highly sensitive ecological system supporting European Protected Species and priority habitats.

The evidence demonstrates that:

- Impacts are intrinsic to the site
- Baseline information is incomplete
- Impact pathways are not fully assessed
- Legal tests under the Habitats Regulations cannot be met

It is not possible to conclude, beyond reasonable scientific doubt, that the Proposed Development would avoid adverse effects on protected species or maintain favourable conservation status.

In these circumstances, the competent authority cannot lawfully grant consent. Consent should therefore be refused on ecological grounds.

Chapter 6. Water Environment and Hydrology

6.1 Chapter Summary

This chapter demonstrates that Sites 8a and 8b are hydrologically connected to the River Tas and form part of a highly sensitive chalk stream catchment.

It shows that:

- The site has direct connectivity to a sensitive receiving environment
- Clear pathways exist for runoff, sediment, and pollutants to enter the watercourse
- Solar development would alter runoff behaviour, increase erosion, and intensify flood risk
- The existing drainage system is already under pressure
- The assessment lacks site-specific modelling and detailed evaluation of impacts
- Sensitive receptors, including private water supplies and access routes, are not adequately assessed

As a result, there is a credible risk of increased flood risk and deterioration of the water environment, and compliance with policy has not been demonstrated.

The proposed development has the potential to significantly alter the hydrological behaviour of the site, particularly in relation to surface water runoff and infiltration. The introduction of solar infrastructure, construction activity, and associated haul roads would lead to soil compaction and degradation, reducing the permeability of the land and its ability to absorb rainfall. This is of particular concern on sloping areas such as Site 8a, where reduced infiltration capacity would increase the rate and volume of surface water runoff, thereby elevating the risk of erosion and localised flooding.

These impacts are intrinsically linked to the loss of soil function and agricultural land quality, as set out in Chapter 8 (Soils and Agricultural Land). The degradation of soil structure not only affects agricultural productivity but also undermines the natural drainage characteristics of the land, which play a critical role in managing surface water flows.

In this context, the scoping out of detailed runoff assessment for the site represents a significant limitation in the Environmental Statement. Given the known characteristics of Site 8a, including its sloping topography and history of localised flooding, a full and site-specific hydrological assessment, including geological and infiltration investigations, is required. Without this, the proposal fails to adequately assess or mitigate its impacts on the water environment, contrary to the principles set out in National Policy Statement for Energy (EN-1) in respect of flood risk and climate resilience.

This chapter sits alongside the report carried out by Create Consultancy – East Pye Solar Farm – Land South of Shotesham all Saints – Flooding Issues and Drainage Assessment. This has been sent via email to the East Pye Solar Planning Inspectorate team.

6.2 Policy Context

Development affecting the water environment must comply with:

- NPS EN-1 §§4.2, 4.3 and 5.15
- National Planning Policy Framework
- Water Framework Directive Regulations

Where uncertainty exists, the precautionary principle applies.

6.3 Hydrological Baseline

Sites 8a and 8b lie within the drainage catchment of a tributary of the River Tas, a nationally important chalk stream.

Chalk streams are:

- Globally rare ecosystems
- Highly dependent on water quality and stable hydrological conditions
- Particularly sensitive to sedimentation and pollution

The land slopes toward the tributary, establishing a direct hydrological connection between the site and a sensitive receiving environment.

6.4 Hydrological Pathways

There are multiple pathways through which water, sediment, and contaminants may be transported from the site to the watercourse:

- Surface runoff
- Subsurface flow
- Field drains and artificial drainage
- Direct proximity to the watercourse

These pathways provide a clear mechanism for effects to extend beyond the site boundary.

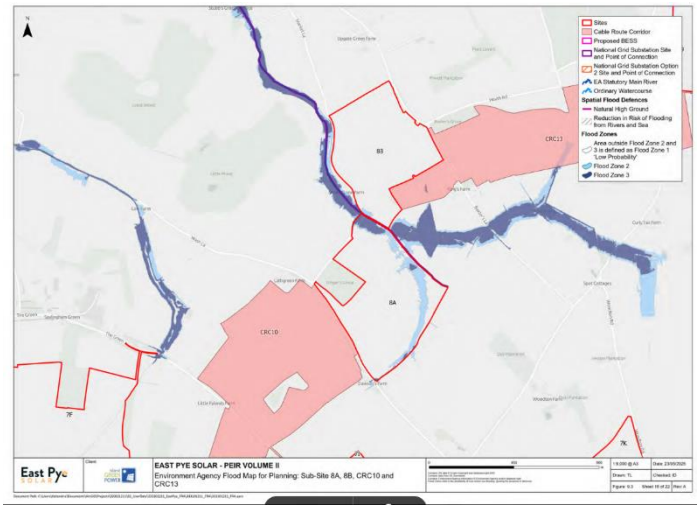


Figure 6.4a – shows Site 8, with the tributary of the River Tas running through the centre and through the grounds of Market Lane Farm

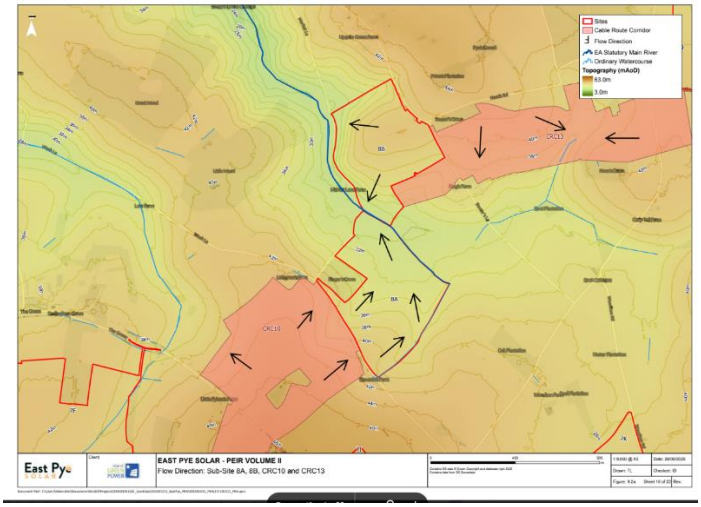


Figure 6.4b – shows the direction of water flow from Site 8 down into the tributary of the River Tas and through the grounds of Market Lane Farm

Cumulative and Systemic Risk to the Environment
The interconnections between hydrology, ecology, and local landform create **compounding and cumulative effects**. Sites 8a and 8b lie within a sloping valley system draining to the River Tas, with direct connectivity to sensitive aquatic and terrestrial habitats. Even limited construction impacts may interact through **surface runoff, sediment transport, and ecological disturbance**, generating effects that are **greater than the sum of individual impacts**. The EIA fails to account for these systemic risks, undermining confidence in its conclusions.

6.5 Existing Conditions

Observed conditions indicate that the hydrological system is already under pressure:

- Overtopping of culverts between Sites 8a and 8b
- Flooding of access routes
- Flooding of Market Lane during heavy rainfall
- Downstream inundation within the floodplain

This demonstrates that:

- The drainage system is operating close to capacity
- The land functions as part of the floodplain
- Access routes are vulnerable to flooding

6.6 Assessment of Effects

Solar development would introduce:

- Soil compaction during construction and operation
- Concentration of rainfall along panel drip lines
- Alteration of natural drainage pathways
- Increased runoff and reduced infiltration

These changes are likely to:

- Increase runoff rates and velocities
- Accelerate delivery of water to the tributary
- Increase sediment mobilisation
- Increase downstream flood risk

This is particularly significant given the sloping topography of the site.

Figure 6.6a – shows the extent of the elevation of Site 8b from the hedge line, down to Market Lane, [redacted]



Figure 6.6b – shows flooding on Site 8a in November 2025. This is a common occurrence



Figure 6.6c – shows a map of Market Lane Farm. The highlighted area shows the extent of flash flooding during periods of high rainfall. This flash flooding covers almost the entirety of Market Lane Farm, apart from the house and garden. Below the map there are pictures to show the flooding corresponding with the letter on the map.

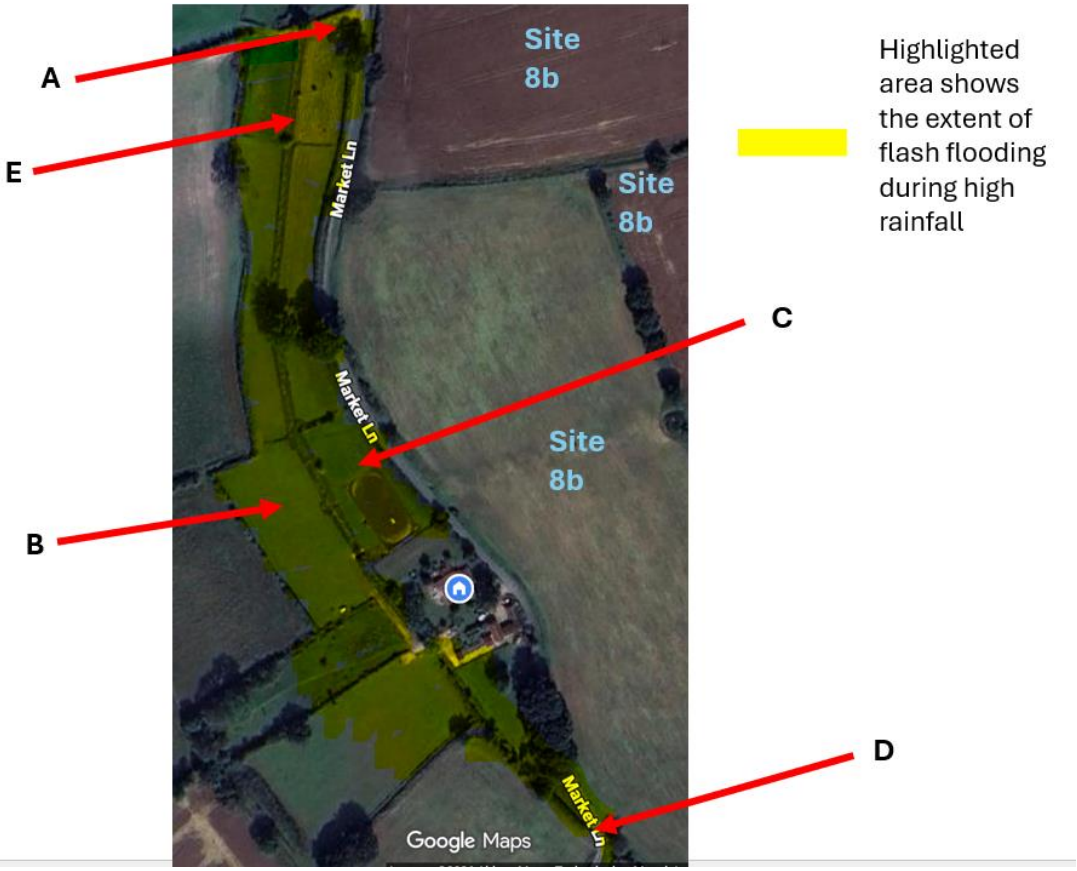


*Image **A** (2 images) – shows flooding at the top end of Market Lane Farm.*





*Image **B** - shows the paddock the other side of the stream(tributary of the river Tas), to l*

*mage **C**. The stream is shown in the foreground of the picture.*



*Image **C** – shows flooding at Market Lane Farm, approximately 20m from Site 8b. The family who lives at Market Lane have lived there for 11 years and experience this level of flooding at least yearly, sometimes more frequently. The water has never reached the house, but all the surrounding paddocks go underwater, because the volume of the stream is not large enough to carry the volume of water, and the rate of flow is not fast enough.*



*Image **D** – shows flooding at the corner of Market Lane, where the transport route between Site 8a and 8b is proposed.*



Image E – shows the tributary of the River Tas that flows through the centre of Market Lane Farm, full to capacity, but not yet overflowing



6.7 Sediment and Pollution Pathways

Construction and operation introduce clear sources of sediment and pollution:

- Soil disturbance from trenching, piling, and vehicle movement
- Fuels, oils, and construction materials
- Mobilisation of disturbed soils

Chalk streams are highly sensitive to fine sediment, which can:

- Smother habitats
- Reduce oxygen levels in gravels
- Damage aquatic species

Given the site's characteristics, there is a clear risk that sediment and pollutants would be transported into the River Tas system.

6.8 Assessment Limitations

The assessment of hydrological effects is affected by significant limitations (see also Chapter 5), including:

- Absence of site-specific hydrological modelling
- No quantified assessment of runoff, infiltration, or flood risk
- No assessment of flooding impacts on access routes

- Limited evaluation of water quality impacts
- Failure to identify and assess all receptors, including private water supplies
- No assessment of downstream receptors including Market Lane Farm;
- No assessment of the cumulative impact of concentrated panel runoff on sloping ground;
- No climate change sensitivity analysis specific to Site 8a;
- **No detailed site-specific modelling or quantified assessment capable of demonstrating how runoff rates, runoff volumes, infiltration behaviour, flow pathways and downstream flood risk will change following construction and operation.**
- The assessment relies on high-level assumptions and outline mitigation rather than demonstrating site suitability. Whilst site runoff has been scoped out across the whole development, Sites 8A and 8B should be treated as an exception due to their sloping topography, direct hydrological connectivity to the River Tas catchment, and documented history of flooding within downstream receptors. Accordingly, a full site-specific hydrological assessment, including geological and infiltration investigations, should be undertaken.

6.8A Applicant's Own Evidence of Flood Risk and Assessment Uncertainty

The Applicant's Flood Risk Assessment and Outline Surface Water Drainage Strategy (ES Appendix 9.1, Document Reference APP/6.3.9.1) contains a number of statements that support concerns regarding the suitability of Sites 8A and 8B.

The Executive Summary acknowledges that:

"Surface water overland flow routes at increased risk are present across the area, mostly associated with ordinary watercourse tributaries, notably within/along the boundary of... Sub-Site 8A."

The FRA therefore confirms that Site 8A contains established surface water flow routes and areas of elevated surface water flood risk.

The Applicant further acknowledges at Paragraph 5.7.9 that:

"a flow path is present in the eastern part of Sub-Site 8A which is not within the Yare-Tas model."

This is a significant admission. The Applicant's own assessment confirms that part of the drainage system affecting Site 8A is not represented within the principal flood model used to assess flood risk. Whilst the Applicant notes that updated Environment Agency mapping subsequently incorporated this feature, the statement nevertheless raises concerns regarding the completeness of the underlying modelling and whether all flood mechanisms affecting Site 8A have been fully assessed and understood.

The FRA also confirms that flooding is a recognised issue within the wider area. Paragraph 5.2.3 states:

"The NCC Flood Investigation Reports indicate that flooding has occurred on local roads and properties of villages in the vicinity of the Order Limits..."

This acknowledgement is directly relevant to concerns regarding flooding in and around Shotesham, including Market Lane and associated drainage routes.

The assessment also relies significantly upon broad-scale modelling assumptions. Paragraph 5.8.5 states:

"The EA's surface water maps are created using a generic methodology on a national scale..."

Whilst the Applicant uses this statement to explain perceived limitations in Environment Agency mapping, it equally demonstrates that elements of the assessment rely upon generic national-scale modelling rather than detailed local investigation.

Importantly, although the FRA discusses flooding affecting local roads and acknowledges elevated surface water flow routes within Site 8A, it contains no specific assessment of flooding associated with Market Lane, Wash Lane or Baxter's Lane, despite these roads forming part of the wider access strategy for the Scheme.

Taken together, these acknowledgements demonstrate that uncertainty remains regarding the hydrological behaviour of Sites 8A and 8B and their contribution to downstream flood risk.

6.8B Review of the Create Consultancy Report in Light of FRA Revisions

The Create Consultancy report, *East Pye Solar Farm – Land South of Shotesham All Saints – Flooding Issues and Drainage Assessment* (October 2025), was prepared prior to the final submission of the Applicant's revised Flood Risk Assessment and Outline Surface Water Drainage Strategy.

Since publication of the Create report, the Applicant has expanded its assessment of surface water flood risk, introduced outline drainage proposals, and provided additional discussion of flood pathways and climate change. These revisions address some of the procedural criticisms identified by Create Consultancy.

However, the principal findings of the Create report remain largely unchanged.

Create identified multiple historic flooding events affecting local roads and downstream receptors and characterised the catchment as highly responsive to rainfall events. The revised FRA confirms that flooding has occurred within nearby settlements and on local roads, supporting concerns regarding the sensitivity of the receiving environment.

Create also identified a flow path within eastern Site 8A that was not represented within the Yare-Tas model. This concern is now acknowledged within the Applicant's own FRA.

The Create report further concluded that Sites 8A and 8B form part of a common drainage basin draining towards Shotesham and the River Tas. The Applicant has not produced any competing catchment analysis that would undermine this conclusion.

Whilst the revised FRA proposes outline mitigation measures, including infiltration features and drainage infrastructure, detailed hydraulic calculations, exceedance routing assessments, maintenance arrangements and site-specific drainage designs remain absent from the application. Important aspects of the drainage strategy therefore remain unresolved.

National planning policy requires that development should not increase flood risk elsewhere. Create Consultancy concluded that the information submitted by the Applicant did not adequately demonstrate that runoff rates, runoff volumes, or downstream flood risk would remain unchanged. Although the Applicant has subsequently expanded the FRA, uncertainty remains regarding runoff concentration, drainage performance and the interaction of the development with an already flood-sensitive catchment.

Consequently, whilst some procedural criticisms have been addressed, the core conclusions of the Create Consultancy report remain valid and continue to support a precautionary approach.

The assessment relies on high-level assumptions and outline mitigation, rather than demonstrating site suitability. Whilst site run-off has been scoped out across the whole development, Site 8a and B should be an exception due the sloping nature of the land, and the known historic risk of flooding. Accordingly, a full assessment, including a geological investigation should be carried out.

6.9 Private Water Supplies and Local Receptors

Local receptors are not adequately assessed.

In particular:

- A private water supply at Market Lane Farm is not clearly identified or assessed
- Localised impacts on groundwater and drinking water supplies are not evaluated
- This is addressed in more detail in Chapter 7

As a result, risks to human health and water quality remain uncertain.

6.10 Summary of Effects

- Increased runoff and altered hydrological behaviour
- Increased flood risk, including to access routes
- Sediment and pollution impacts on a sensitive chalk stream
- Pressure on an already constrained drainage system
- Potential effects on private water supplies

6.11 Policy Conflict

The Proposed Development conflicts with:

- NPS EN-1 §§4.2, 4.3 and 5.15
- National Planning Policy Framework
- Water Framework Directive Regulations

The available evidence does not establish that flood risk would be controlled, water quality protected, or sensitive receptors safeguarded.

6.11A Exception Test and Flood Risk Policy

The National Planning Policy Framework requires that where development is proposed in areas at risk of flooding, and where the Exception Test applies, it must be demonstrated that:

1. The development provides wider sustainability benefits that outweigh flood risk; and
2. The development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Whilst the Proposed Development may contribute towards renewable energy generation and national decarbonisation objectives, these benefits do not remove the requirement to demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere.

The evidence presented in this chapter demonstrates that Sites 8a and 8b form part of a sensitive hydrological system characterised by:

- Sloping topography directing runoff towards downstream receptors
- Existing flooding of Market Lane and adjacent land during periods of heavy rainfall
- Overtopping of culverts and constrained drainage infrastructure
- Direct hydrological connectivity with the River Tas catchment
- The presence of private water supplies and residential receptors immediately downstream

The Environmental Statement does not contain site-specific hydrological modelling capable of demonstrating how runoff rates, runoff volumes, peak flows, infiltration rates or flow pathways will change following construction and operation of the Proposed Development. Nor does it provide a quantified assessment of impacts on downstream receptors including Market Lane Farm, private water supplies, Market Lane itself, or other properties located within the receiving catchment.

In the absence of such evidence, it has not been demonstrated that:

- Flood risk will not increase elsewhere
- Existing flooding problems will not be exacerbated
- Surface water pathways will not be altered to the detriment of downstream receptors
- Sensitive groundwater and private water supply receptors will remain protected
- The development will be safe throughout its operational lifetime, including under future climate change scenarios

The Applicant has therefore failed to provide sufficient evidence to demonstrate compliance with the second limb of the Exception Test.

Furthermore, given the known flooding history of the site and surrounding area, the absence of detailed hydrological modelling and geological investigation creates significant uncertainty regarding the true extent of potential impacts. In accordance with the precautionary principle and the requirements of NPS EN-1, this uncertainty should be afforded substantial weight.

Accordingly, the Examining Authority cannot be satisfied that the Proposed Development meets the requirements of national flood risk policy or, where applicable, the Exception Test.

6.12 Conclusion

Sites 8a and 8b form part of a hydrologically sensitive system directly connected to the River Tas catchment.

The evidence demonstrates that:

- Clear pathways exist for runoff, sediment, and pollutants
- The site is already affected by flooding and drainage constraints
- The Proposed Development would alter hydrological processes
- The assessment is incomplete and relies on uncertain mitigation

It cannot be concluded that:

- Flood risk would be avoided
- Water quality would be protected
- Sensitive receptors would not be affected

In the absence of sufficient and reliable evidence, the decision-maker cannot be satisfied that the development would avoid harm to the water environment.

The Applicant's own Flood Risk Assessment acknowledges elevated surface water flow routes within Site 8A, a flow path not represented within the principal Yare-Tas model, and a history of flooding affecting roads and properties within nearby settlements. These admissions reinforce the conclusion that uncertainty remains regarding the hydrological behaviour of Sites 8A and 8B and the potential for increased flood risk elsewhere.

East Pye has scoped out detailed runoff assessment across the entire project despite Site 8a being one of the most topographically sensitive sites in the scheme and despite clear evidence of existing flooding immediately downstream.

This uncertainty attracts substantial weight and weighs strongly against the inclusion of Site 8 within the Proposed Development.

Chapter 7. Private Water Supply and Groundwater Risk

7.1 Chapter Summary

This chapter identifies the risk posed by the Proposed Development to a private drinking water supply at Market Lane Farm, and six properties on Baxter's Lane and to the wider groundwater system.

It demonstrates that:

- A highly sensitive receptor is present immediately adjacent to Site 8
- The site lies within a groundwater recharge area and Source Protection Zone
- Credible contamination pathways exist during both construction and operation
- Baseline information is limited and key assessments are deferred to post-consent stages
- No site-specific hydrogeological assessment has been undertaken

As a result, there is a clear risk to groundwater quality and human health, and compliance with national policy has not been demonstrated.

7.2 Policy Context

Development affecting groundwater and drinking water supplies must comply with:

- NPS EN-1 §§4.2.5 and 4.3.3
- NPS EN-1 §5.15.8
- National Planning Policy Framework

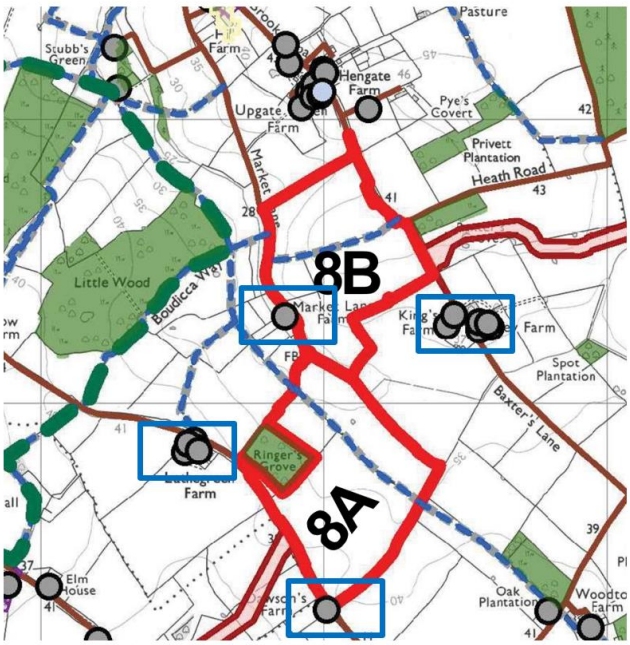
Where uncertainty exists, the precautionary principle applies.

7.3 Baseline Conditions and Receptor Identification

Market Lane Farm, located immediately adjacent to Site 8b and downstream off all water run off from Site 8a and 8b, relies on a private groundwater abstraction for its drinking water supply.

In addition, there are several other properties in the vicinity of Site 8 who also rely on private water supplies for their drinking water.

Figure 7.3a – shows properties with private water supplies near Site 8. Mains water is NOT available to any of these properties.



Indicates where there are properties with private water supplies

Private water supplies are highly sensitive receptors because they:

- Depend directly on groundwater quality
- May have limited treatment infrastructure
- Are vulnerable to localised contamination

The presence of this borehole was identified during consultation. However:

- No site-specific assessment has been undertaken
- No baseline groundwater quality data has been collected
- No site visit has been carried out

This reflects a wider limitation in baseline evidence.

Figure 7.3b – shows the distance of 38.25m from Site 8b to the borehole for Market Lane Farm's private water supply.



7.4 Hydrogeological Context

Site 8 lies within a sensitive hydrogeological environment:

- Within the River Tas catchment
- Within a groundwater recharge area
- Within a Source Protection Zone (SPZ3)
- Within an area of groundwater vulnerability

These conditions indicate that:

- Pollutants introduced at the surface may reach groundwater
- The site contributes to water feeding local abstractions

The sloping topography establishes a direct pathway between Site 8 and the adjacent borehole supply.

7.5 Contamination Pathways

The Proposed Development introduces multiple contamination pathways.

Construction phase:

- Fuel and oil spills
- Soil disturbance and mobilisation of contaminants
- Trenching and excavation
- Creation of preferential pathways through piling

Operational phase:

- Herbicide use
- Potential release from damaged infrastructure
- Concentrated runoff from panel drip lines

Given the site's hydrogeological connectivity, these represent credible mechanisms for contamination of the borehole supply.

7.6 Assessment of Effects

The combination of:

- Groundwater vulnerability
- Direct hydrological connectivity
- Presence of a sensitive receptor
- Potential contamination sources

creates a clear risk of:

- Groundwater contamination
- Degradation of water quality
- Impacts on potable water supply

These effects may arise from both routine activities and accidental events.

7.7 Assessment Limitations

The assessment is affected by significant limitations (see also Chapter 5), including:

- Absence of a hydrogeological assessment of the borehole at Market Lane Farm, or other properties in the vicinity of Site 8
- No delineation of recharge areas
- No baseline groundwater quality data
- No quantitative risk assessment
- Limited intrusive ground investigation

The Environmental Statement confirms that ground conditions are not fully understood and that further investigation is deferred to post-consent.

As a result, the magnitude of risk and the effectiveness of mitigation are not established.

7.8 Relationship with the River Tas Catchment

Groundwater and surface water systems are interconnected.

Site 8 forms part of the River Tas catchment, meaning that:

- Contamination may affect both groundwater and surface water
- Effects may extend beyond the site boundary
- Risks to private water supplies are linked to wider ecological impacts

This reinforces the sensitivity of the receiving environment.

7.9 Limitations of Mitigation

The Environmental Statement relies on outline mitigation and post-consent controls.

However:

- Measures are not fully defined
- Effectiveness is not demonstrated
- Implementation is uncertain

Residual risks remain from:

- Accidental spills
- Equipment failure

- Extreme weather
- Long-term soil degradation

Where a private drinking water supply is present, even minor contamination events may have significant consequences.

7.10 Summary of Effects

- Risk of contamination to a private drinking water supply
- Potential impacts on human health
- Degradation of groundwater quality
- Linked impacts on the wider River Tas system
- Uncertainty due to lack of site-specific assessment

7.11 Policy Conflict

The Proposed Development conflicts with:

- NPS EN-1 §§4.2.5, 4.3.3 and 5.15.8
- National Planning Policy Framework

The available evidence does not establish that groundwater quality would be protected or that risks to human health would be avoided.

7.12 Conclusion

The Proposed Development introduces credible contamination pathways within a groundwater recharge area serving a private drinking water supply.

The evidence demonstrates that:

- A highly sensitive receptor is present
- There are clear contamination pathways
- Baseline information is limited
- The assessment relies on post-consent investigation

It cannot be concluded that:

- The borehole supply would be protected
- Contamination pathways would be effectively controlled
- Risks to human health would be avoided

In the absence of sufficient and reliable evidence, and applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm.

This uncertainty attracts substantial weight and weighs strongly against the inclusion of Site 8 within the Proposed Development.

Chapter 8. Soils and Agricultural Land

8.1 Chapter Summary

This chapter assesses the impacts of the Proposed Development on soils and agricultural land at Sites 8a and 8b.

It demonstrates that:

- The soils are highly sensitive to compaction and structural damage
- Solar development introduces clear mechanisms for long-term degradation
- Soil impacts are likely to be long-term or irreversible within agricultural timescales
- Best and Most Versatile (BMV) agricultural land would be degraded
- Soil disturbance may mobilise existing or unknown contamination
- Soil degradation would alter hydrological behaviour and increase runoff
- The proposed haul routes across sites 8a and 8b would exacerbate compaction and reduce surface water drainage

Baseline information is limited, and key aspects of soil condition and contamination are not fully understood.

As a result, soil impacts have not been robustly assessed, and compliance with national policy has not been demonstrated.

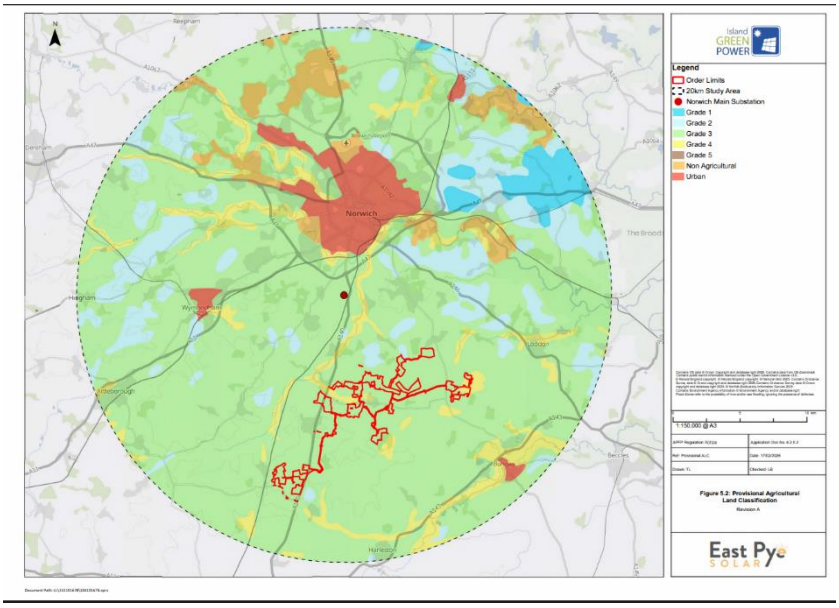
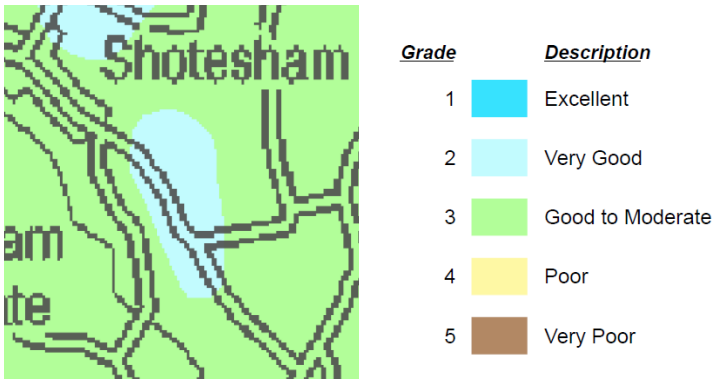


Figure 8.1a – shows the soil grading classification in the area of the East Pye Solar proposal.

Figure 8.2b – shows the area of Site 8a and b, demonstrating that Site 8 is made of a mix of Grade 2 and Grade 3 soils



https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736

Agricultural land classification map Eastern Region

8.2 Policy Context

Development affecting soils and agricultural land must comply with:

- NPPF §§174, 180 and 181
- NPS EN-1 §§4.2.5 and 4.3.3
- NPS EN-1 §5.15.8

Best and Most Versatile land should be protected, and soil resources conserved.

8.3 Baseline Conditions

Sites 8a and 8b comprise actively managed agricultural land forming part of the wider rural landscape.

The soils are predominantly:

- Clay and clay loam (Beccles 1 series)
- Slowly permeable
- Seasonally waterlogged

These soils:

- Are likely to fall within BMV land (Grades 2 and 3a)
- Have a long field capacity period (110–118 days)
- Are structurally sensitive and vulnerable to compaction

Ground condition data is limited, and potential contamination has not been fully characterised.

8.4 Mechanisms of Soil Damage

The Proposed Development introduces multiple mechanisms for soil degradation.

Construction phase:

- Heavy machinery trafficking
- Trenching and excavation
- Piling and installation of infrastructure

Operational phase:

- Maintenance vehicle movements

- Localised compaction around infrastructure

These activities result in:

- Surface and subsoil compaction
- Mixing of soil horizons
- Disruption of natural drainage
- Potential mobilisation of contaminants

8.5 Long-Term Effects

Compaction can extend into subsoil layers and is difficult to remediate.

These changes result in:

- Reduced pore space
- Reduced infiltration
- Impaired drainage
- Restricted root development

Once established, these effects may persist for decades and represent a permanent degradation of soil function.

8.6 Assessment of Effects

The Proposed Development is likely to result in:

- High risk of soil compaction due to heavy machinery and repeated trafficking
- Degradation of soil structure and function
- Increased waterlogging and reduced drainage
- Reduced agricultural productivity

Although continued agricultural use (e.g. grazing) is proposed, this represents a reduction from current arable use and a loss of productive capacity.

There is also a risk that soil disturbance may mobilise unknown contamination and affect soil quality.

8.7 Interaction with Hydrology

Soil condition directly influences hydrological behaviour.

Compaction of clay soils:

- Reduces permeability
- Reduces infiltration
- Increases surface runoff

At Sites 8a and 8b, this is particularly significant due to:

- Existing poor drainage
- Sloping topography

Compacted areas may concentrate and redirect surface flows, increasing pressure on drainage systems.

This conflicts with the assumption that runoff can be effectively controlled.

8.8 Assessment Limitations

The assessment is affected by significant limitations (see also Chapter 5), including:

- Limited baseline soil and ground condition data
- Uncertainty regarding contamination
- No robust assessment of compaction risk
- No evidence that soil structure can be restored
- Reliance on outline soil management measures

The Environmental Statement confirms that ground conditions are not fully understood and that further investigation is deferred to post-consent.

As a result, the scale of impacts and the effectiveness of mitigation are not established.

8.9 Limitations of Mitigation

Proposed mitigation measures include:

- Soil management plans
- Controlled trafficking
- Low ground pressure equipment

However:

- These measures reduce but do not eliminate risk
- They do not address deep subsoil compaction
- Their effectiveness depends on implementation

There is no reliable method to fully restore soil structure once significant damage has occurred.

8.10 Summary of Effects

- Long-term degradation of soil structure
- Functional loss of Best and Most Versatile land
- Reduced agricultural productivity
- Increased surface runoff and flood risk
- Potential mobilisation of soil contamination
- The proposed development would give rise to significant and interrelated adverse effects on soil function and the water environment, whereby soil compaction and degradation would reduce infiltration capacity, increase surface water runoff, and exacerbate localised flood risk, particularly on sloping land at Site 8a, resulting in a clear conflict with National Policy Statement for Energy (EN-1) in respect of sustainable land use and flood risk management.

- These effects are considered to be of at least moderate adverse significance, with the potential to be significant in planning terms when taken cumulatively with existing site constraints and the identified limitations in the Applicant's assessment, and should therefore be afforded substantial weight in the decision-making process.

8.11 Policy Conflict

The Proposed Development conflicts with:

- NPPF §§174, 180 and 181
- NPS EN-1 §§4.2.5, 4.3.3 and 5.15.8

The available evidence does not establish that soil resources would be protected or that impacts would be reversible.

8.12 Conclusion

Norfolk contains approximately one million acres of agricultural land, forming one of the most productive arable landscapes in England. This high proportion of intensively farmed land reflects the county's significant contribution to national food production. However, agricultural land within Norfolk is increasingly subject to competing pressures, including acquisition for non-agricultural investment purposes, contributing to rising land values and reduced availability for active farming. In this context, the proposed development would result in the loss and fragmentation of agricultural land, contributing to a cumulative erosion of a finite and nationally important resource.

Paragraphs within National Policy Statement for Energy (EN-1) recognise the need to consider the effective use of land and the protection of higher quality agricultural soils. The introduction of extensive solar infrastructure, together with associated haul roads and construction activity, would lead to soil compaction, reducing infiltration capacity and altering natural drainage characteristics. This would not only diminish soil quality and disrupt land management practices, but also increase surface water runoff, particularly on sloping land such as Site 8a, thereby exacerbating erosion and elevating localised flood risk (see Chapter 6: Water Environment and Hydrology).

In this context, the development fails to demonstrate that poorer quality land has been prioritised, or that the impacts on agricultural land and associated hydrological processes have been minimised in accordance with national policy. The proposal would also contribute to a wider cumulative trend in which productive farmland is progressively displaced from its primary function, while simultaneously increasing pressure on the local water environment. The proposal therefore gives rise to a clear conflict with the objectives of EN-1 in respect of sustainable land use, soil protection, and flood risk management.

Sites 8a and 8b comprise high-quality, sensitive soils that are vulnerable to structural damage.

The evidence demonstrates that:

- There is a high risk of soil compaction
- Soil structure would be degraded
- Agricultural productivity would be reduced
- Impacts are likely to be long-term or irreversible
- Soil degradation would increase runoff and flood risk

Baseline conditions are not fully understood, and the assessment relies on post-consent investigation and uncertain mitigation.

It cannot be concluded that soil function would be preserved or that impacts would be temporary and reversible.

This uncertainty attracts substantial weight and weighs strongly against the inclusion of Site 8 within the Proposed Development.

Heritage and landscape

Chapter 9. Cultural Heritage

9.1 Chapter Summary

This chapter assesses the impact of the Proposed Development on the historic landscape and the setting of the Shotesham Conservation Area, and the importance of preserving the settings of designated and non designated historic buildings.

It demonstrates that:

- Sites 8a and 8b form part of a historically coherent and sensitive landscape of considerable time depth
- The setting of the Conservation Area is integral to its significance
- The Proposed Development would disrupt historic field patterns and landscape character
- The introduction of solar infrastructure would industrialise the rural setting
- Mitigation measures would not address the identified harm
- The settings of designated and non-designated historic buildings have not been addressed

As a result, the proposal would cause harm to designated heritage assets that has not been avoided or justified.

9.2 Policy and Statutory Context

Heritage assets must be considered in accordance with:

- Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990
- National Planning Policy Framework
- NPS EN-1 §5.8
- Section 66(1) of the Planning Listed Building and Conservation Areas Act 1990

Where harm to significance is identified, it must be clearly justified and given appropriate weight in the planning balance.

9.3 Baseline and Setting

Sites 8a and 8b lie within the setting of the Shotesham Conservation Area and form part of a well-preserved historic agricultural landscape.

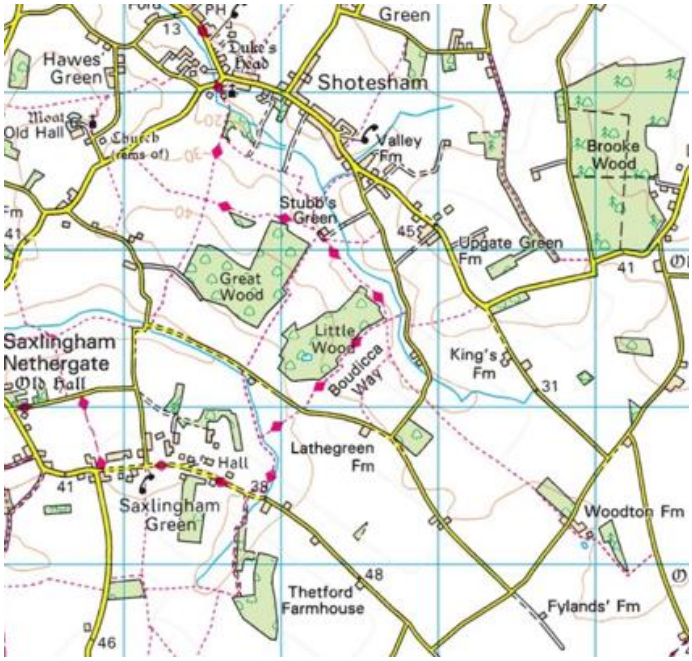
Shotesham sits within a well-preserved area of ‘ancient countryside’, characterised by small villages, isolated farms, ancient woodland, winding lanes, and species-rich hedgerows, reflecting centuries of agricultural use. Situated on the south Norfolk clays, the area escaped post-WWII hedgerow removal, retaining historic field boundaries and ancient woodlands at Shotesham Great and Little Woods and Ringers Grove.

The village and surrounding farms likely originated as subsidiary settlements to the Roman regional capital of Venta Icenorum (Caister St Edmunds), with the name ‘Scott’s farmstead’ dating from 650–850. The medieval landscape featured open-strip arable fields with pockets of common and woodland, leaving distinctive evidence in sinuous hedgerows laid during sixteenth- and seventeenth-century enclosure.

Of particular significance is the framework of roads and fields structuring the modern landscape. Around Shotesham and Saxlingham, parallel roads, footpaths, and field boundaries run northwest–southeast from the River Tas to higher ground near Fylands

Farm, forming a ‘co-axial field system’. These alignments originate in the late prehistoric or Roman period, with droves such as Wash Lane linking valley resources to upland pastures. The system at Shotesham is uniquely well-preserved, allowing appreciation of the long-term historic layering of the landscape.

Figure 9.3a: *Co-axial field system around Shotesham. Parallel roads, footpaths, and field boundaries reflect centuries of human activity, particularly around King’s and Lathegreen Farms and Thetford Farmhouse, illustrating routes linking the river valley and neighbouring uplands from the late prehistoric or Roman period*



This landscape provides:

- Openness and rural character
- Visual and spatial context to the settlement
- Continuity with historic land use

The surrounding countryside is integral to how the Conservation Area is experienced and understood. It is not only important to the historic setting of the Conservation Area but also forms an important part of community life. Local residents actively engage with the landscape through wildlife recording, conservation activities, and recreational use of the extensive network of public rights of way. Community-led initiatives, including wildlife surveys, conservation projects and locally produced walking guides, demonstrate the strong relationship between the village and its surrounding countryside.

Figure 9.3b and c – show images of Shotesham All Saints wildlife survey and book of walks

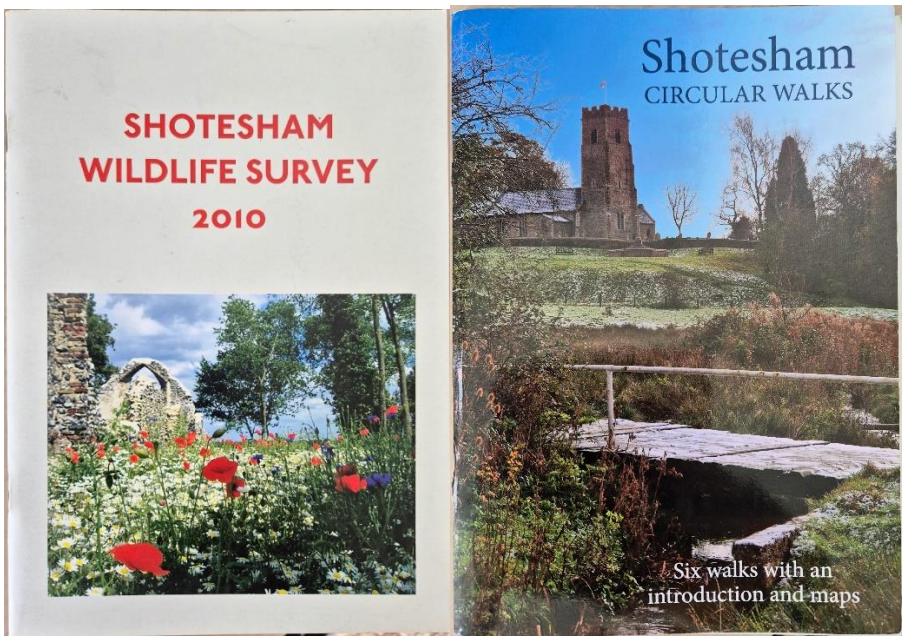
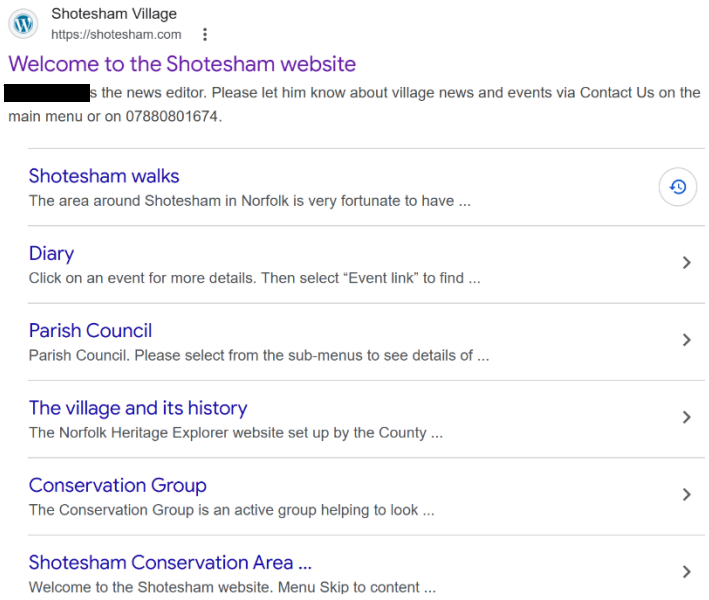


Figure 9.3d – shows an image of the Shotesham All Saint's website. Evidencing clear links to the village and the environment around it.



9.4 Contribution of Setting to Significance

The significance of the Conservation Area is closely tied to its agricultural setting.

The surrounding landscape:

- Provides a rural foreground and backdrop
- Maintains historic relationships between settlement and land use
- Preserves the legibility of historic development patterns

Sites 8a and 8b contribute directly through:

- Open agricultural character

- Visual continuity
- Key views from roads and public rights of way

Figure 9.4a shows the proximity of Site 8 to the main village and to the Grade 11 listed Upgate Farm and its associated buildings which are also listed.

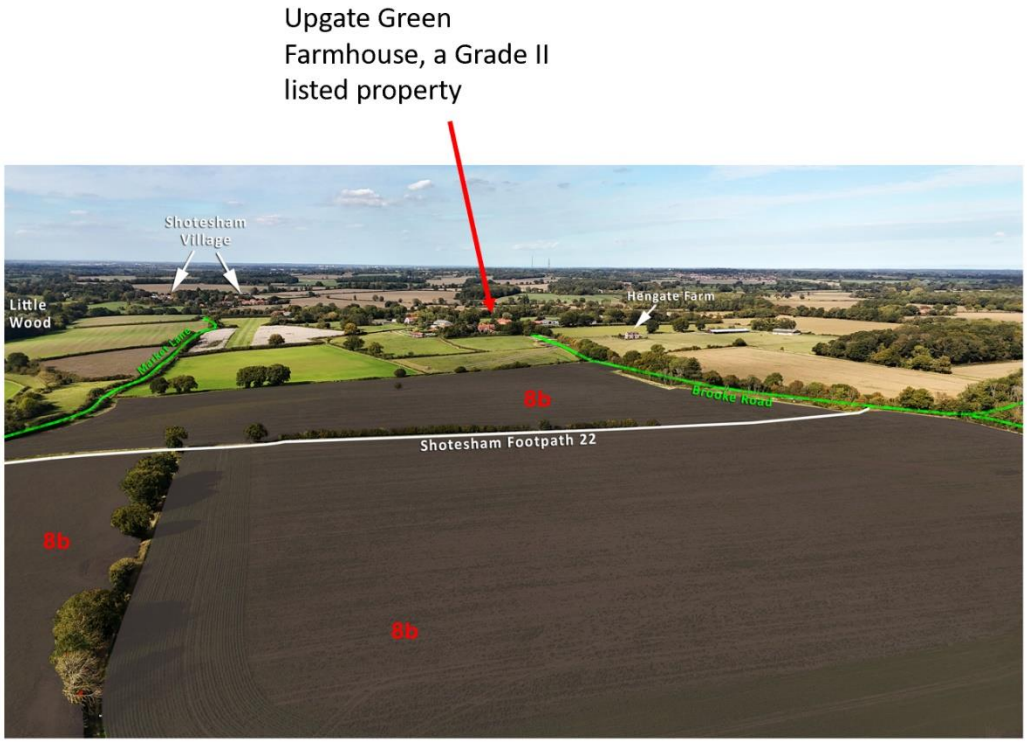


Figure 9.4b – Shows an image of Upgate Farm



Figure 9.4c - The Interconnected Historic Character of Shotesham Village and its Agricultural Setting



Traditional buildings within the Shotesham Conservation Area. The significance of the conservation area derives not only from individual heritage assets but also from their relationship with the surrounding agricultural landscape, historic lanes, public rights of way and open countryside.

9.5 Historic Landscape Character

The historic landscape character of Shotesham derives from the survival of a highly legible agricultural landscape containing evidence of multiple periods of human activity, including prehistoric and Romano-British co-axial field systems, medieval enclosure patterns, historic routeways and drove roads, and long-established field boundaries and hedgerows.

The landscape retains a strong relationship with the Shotesham Conservation Area and surrounding historic buildings, helping to preserve their rural setting and historic context. Collectively, these features create a landscape of considerable evidential value and historical coherence, with the co-axial field system forming a key element of its significance.

9.6 Assessment of Effects

The Proposed Development would introduce:

- Solar arrays
- Security fencing
- Associated infrastructure

This would result in:

- Industrialisation of the rural setting
- Enclosure of open countryside
- Loss or filtering of long-distance views
- Erosion of tranquillity and rural character

The character of the site would change from agricultural to industrial.

9.7 Impact on Historic Landscape

The development would affect the integrity of the historic landscape through:

- Ground disturbance
- Loss or fragmentation of field boundaries
- Disruption of co-axial field systems
- Interruption of historic routeways

This would result in:

- Loss of evidential value
- Reduction in time depth
- Fragmentation of a coherent historic landscape

9.8 Archaeological Context

The wider area demonstrates evidence of long-term occupation and landscape evolution.

While limited remains are recorded within the site, the surrounding landscape:

- Has high archaeological potential
- Contributes to understanding of historic land use

Ground disturbance therefore carries a risk of affecting previously unidentified remains.

9.9 Assessment Limitations

The heritage assessment is affected by limitations (see also Chapter 5), including:

- Geophysical surveys based on earlier site boundaries
- Partial archaeological investigation
- Limited assessment of setting impacts

The assessment relies on mitigation measures and does not fully address the fundamental change in landscape character.

As a result, the extent of harm is likely to be underestimated.

9.10 Limitations of Mitigation

Proposed mitigation measures, including planting, would not address the identified harm because:

- They would not restore historic field patterns
- They would introduce additional non-historic elements
- They would take many years to establish
- They would not reinstate openness
- They would significantly alter the open and scenic nature of the land
- They would provide no effective mitigation due to the topography of the land

The harm arises from the presence and scale of development, not from visibility alone.

9.11 Summary of Effects

- Harm to the setting of the Conservation Area
- Industrialisation of a historic agricultural landscape
- Fragmentation of historic field patterns
- Loss of openness and rural character
- Reduction in evidential and cultural value
- Harm the settings of designated and non-designated buildings

9.12 Policy Conflict

The Proposed Development conflicts with:

- Section 72 duty to preserve or enhance Conservation Areas
- National Planning Policy Framework
- NPS EN-1 §5.8

The identified harm has not been avoided or justified.

9.13 Conclusion

Sites 8a and 8b form part of a well-preserved historic landscape that contributes to the setting and significance of the Shotesham Conservation Area.

The evidence demonstrates that:

- Industrial infrastructure would be introduced into a historic agricultural landscape
- Open countryside would be enclosed and landscape character altered
- Historic field systems and relationships would be disrupted
- The rural setting of the Conservation Area would be eroded
- Designated and non-designated historic buildings and their settings would be significantly altered and harmed

The identified harm is not avoided, not mitigated, and not justified.

It should therefore be afforded considerable weight in the planning balance and weighs strongly against the inclusion of Sites 8a and 8b within the Proposed Development.

Chapter 10. Landscape and Visual Impact

10.1 Chapter Summary

This chapter assesses the effects of the Proposed Development on landscape character and visual amenity at Sites 8a and 8b.

It demonstrates that:

- The site lies within a landscape of high value, high susceptibility, and high sensitivity (as identified by the Applicants own assessment)
- The landscape has limited capacity to accommodate large-scale development
- Industrial-scale solar infrastructure would be introduced into a rural landscape
- Significant adverse effects on landscape character and visual amenity are identified by the Applicant's own assessment
- Effects are widespread, long-term, and persist beyond Year 15
- Mitigation measures would not effectively reduce or offset the harm

As a result, the development would result in substantial and unavoidable landscape and visual harm.

This chapter sits alongside the report completed and submitted to the Planning Inspectorate by [redacted]. CLASSIC LANDSCAPE ARCHITECTURE LTD – Reference: Landscape and Visual Matters CLA/330/25/01

10.2 Policy Context

Landscape and visual effects must comply with:

- NPS EN-1 §5.10 (including cumulative effects)
- National Planning Policy Framework (protection of intrinsic character and beauty of the countryside)

Valued landscapes are protected irrespective of formal designation. Significant adverse effects must be afforded substantial weight.

10.3 Baseline and Landscape Sensitivity

Sites 8a and 8b lie within the Tas Valley countryside surrounding Shotesham.

Key characteristics:

- Intact historic field patterns with strong time depth
- Well-defined hedgerows and field boundaries
- Open, expansive views across gently undulating land
- High levels of tranquillity with limited modern intrusion

The Applicant's assessment identifies the site as:

- High landscape value
- Highly susceptible to change
- Of high overall sensitivity

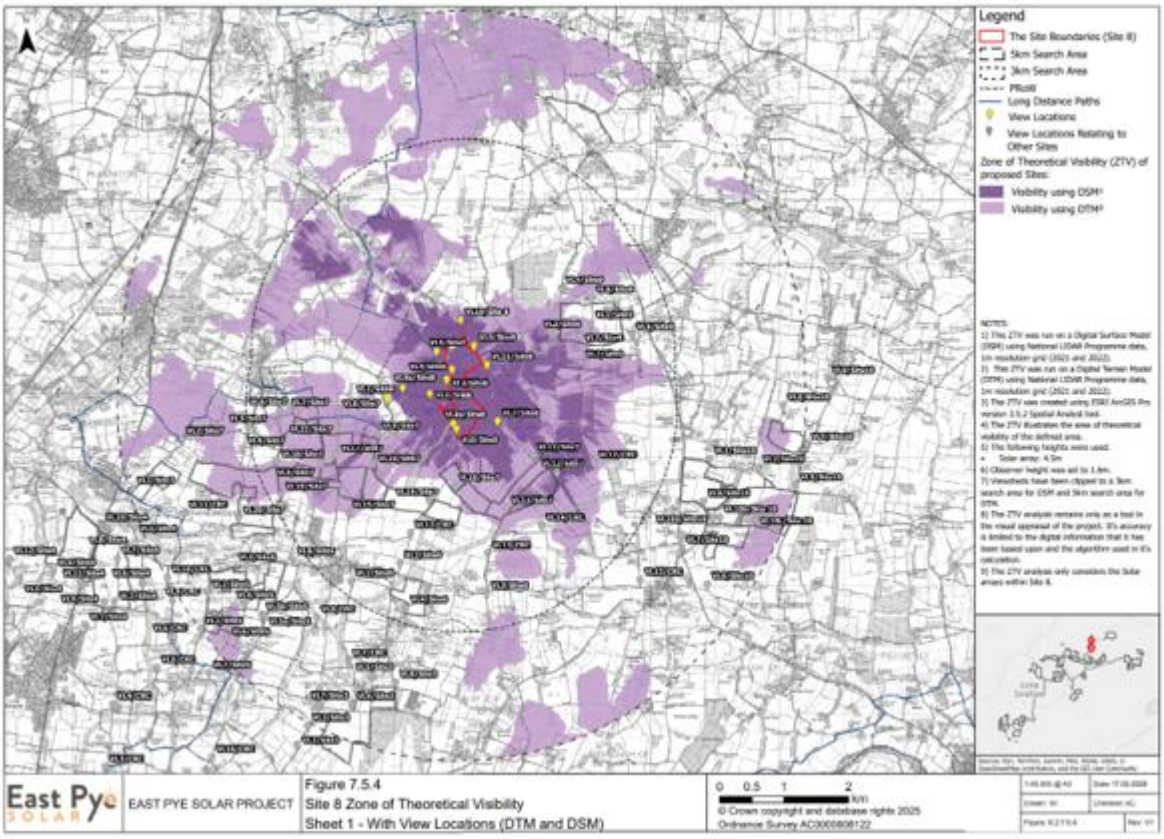
It lies within A1 Tas Rural River Valley and B1 Tas Tributary Farmland, both with limited capacity for solar development. The landscape also supports recreational use, including the Boudicca Way, and contributes to the setting of the Shotesham Conservation Area.

10.4 Visual Envelope and Receptors

The site is widely visible from:

- Public Rights of Way (Footpaths 19 and 22, Boudicca Way)
- Local roads (Brooke Road, Baxter's Lane, Market Lane, Wash Lane)
- Residential properties, including Market Lane Farm and Dawson's Farm(~20m from Site 8b), Golden Owl Barn, Kings Farm, Wodehouse, The Copse, Hill View and Ley Farm (all within 150 m from site 8b)
- Elevated viewpoints across the Tas Valley
- Golden Owl Barn overlooks the entirety of site 8a
- Solar panels proposed on site 8B will run parallel with footpath 22, will be highly visible from Brooke Road and Baxter's Lane. This is recognised by the Applicant in Fig 7.6.8 (visualisation of site 8)

Figure 10.4a – Shows the how the undulating nature of Site 8 means that a massive theoretical zone of visibility is created around it.



Receptor sensitivity is high, particularly for residents and recreational users. The wide visual envelope amplifies the significance and extent of effects.

10.5 Assessment of Effects

The Proposed Development would introduce:

- Extensive solar arrays of uniform, engineered form
- Security fencing, access tracks, and ancillary infrastructure

This would result in:

- Loss of openness and enclosure of the landscape
- Industrialisation of the rural setting
- Disruption of historic field patterns and fine-grained landscape character

The scale and form of development are at odds with the existing rural and historic landscape.

10.6 Findings of the LVIA

The Applicant's own LVIA identifies:

- Significant adverse effects on landscape character
- Significant visual effects at multiple receptors
- Effects persisting beyond Year 15

Moderate adverse effects under the Applicant's methodology constitute significant effects. These findings confirm the effects are widespread, long-term, and unavoidable.

10.7 Assessment Limitations

The LVIA is affected by:

- Constrained study area
- ZTV used as a limiting rather than analytical tool
- Limited cumulative effects assessment
- Assumption of effective embedded mitigation
- Sensitivity inconsistently applied in conclusions

Residential Visual Amenity assessment lacks clarity:

- Receptor identification and mapping are incomplete
- Dawson's Farm on Wash Lane, Owl Barn on Baxter's Lane and other worst-case receptors are not fully considered

Mitigation measures, including structural planting and hedgerow reinforcement, are limited:

- Require many years to establish
- Only provide partial and seasonal screening
- Cannot restore openness or historic landscape character

Residential Visual Amenity – Assessment Limitations

The Applicant's Residential Visual Amenity Assessment does not provide sufficient clarity or transparency in the identification and selection of residential receptors. No plans are provided to clearly show the location of assessed properties relative to the Proposed Development, making it difficult to verify whether the most affected receptors have been included.

In the case of Sites 8A and 8B, Market Lane Farm is located approximately 20 metres from the boundary of Site 8B and represents one of the closest and most sensitive residential receptors. However, it is not clearly identified within the assessment, and there is no evidence to demonstrate that its effects have been explicitly assessed. In addition, part of the hedge line of the property is likely to be removed to support vehicle visibility on Market Lane Farm, this would further impact on the visibility of construction traffic and the final scheme.

Dawson's Farm on Wash Lane is also less than 20m away from Site 8a, and has a cable corridor going through the grounds of the property.

Owl Barn on Baxter's Lane has open and wide-ranging views of Site 8A, and has not been considered. In addition, it is very close to the proposed cable route corridor into Site 8b.

Figure 10.7x – shows image of Owl Barn and its views across Site 8a



The assessment relies on a limited number of representative receptors selected through professional judgement, without sufficient justification for the inclusion or exclusion of specific properties. As a result, there is a clear risk that the worst-case scenario has not been assessed.

At such proximity, the Proposed Development would result in a substantial and immediate change to outlook, with potential effects approaching or exceeding recognised Residential Visual Amenity thresholds.

Accordingly, the absence of clear receptor mapping and the lack of evidence that the nearest properties have been assessed undermine the robustness of the conclusions. The findings of the Residential Visual Amenity Assessment should therefore be afforded limited weight.

10.8 Summary of Effects

- Industrialisation of a rural landscape
- Enclosure of open countryside
- Disruption of historic field patterns
- Loss and filtering of long-distance views
- Reduction in tranquillity and rural character
- Significant visual effects across multiple receptors

10.9 Policy Conflict

The Proposed Development conflicts with:

- NPS EN-1 §5.10
- National Planning Policy Framework

The identified harm:

- Has not been avoided
- Cannot be effectively mitigated
- Has been underestimated

10.10 Conclusion

Sites 8a and 8b lie within a highly sensitive landscape of high value and limited capacity to accommodate change.

The Proposed Development would:

- Fundamentally alter landscape character
- Result in significant, long-term, and widely experienced visual effects
- Introduce industrial infrastructure into a valued rural setting
- Fail to be effectively mitigated

The resulting landscape and visual harm is inherent, substantial, and unavoidable. It should therefore be afforded substantial weight in the planning balance and weighs decisively against the inclusion of Sites 8a and 8b within the Proposed Development.

People and amenity

11. Public Rights of Way

11.1 Chapter Summary

This chapter assesses the effects of the Proposed Development on Public Rights of Way (PRoW) within and around Sites 8a and 8b.

It demonstrates that:

- Public Rights of Way form a highly sensitive recreational resource
- The Proposed Development would introduce enclosure and industrialisation into an open rural landscape
- User experience, amenity, and perceived safety would be significantly degraded
- Effects would be sustained along routes, particularly the Boudicca Way
- The assessment fails to properly consider experiential and cumulative effects

As a result, the proposal would give rise to significant adverse impacts on recreational amenity that have not been adequately assessed.

11.2 Policy Context

Development affecting Public Rights of Way and recreational receptors must consider:

- **NPS EN-1 §5.12** (amenity, health, and quality of life)
- **National Planning Policy Framework** (support for public access and protection of the natural environment)

The quality of user experience is a material consideration, not just the retention of physical access.

11.3 Baseline Conditions

Public Rights of Way within and surrounding Sites 8a and 8b include:

- Footpaths 19 and 22
- The Boudicca Way

These routes:

- Pass through or adjacent to the site
- Form part of a connected recreational network
- Are valued for openness, tranquillity, and views

The baseline experience is characterised by:

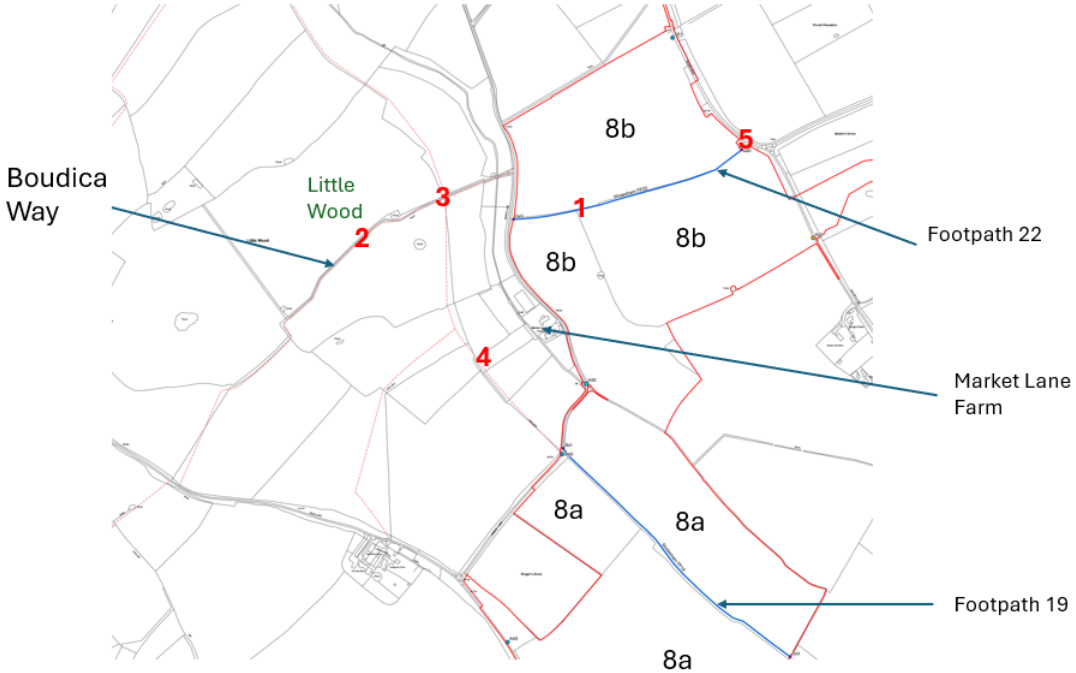
- Open views across agricultural land
- Strong connections to the wider countryside
- High levels of tranquillity
- Limited visual intrusion

These attributes establish a highly sensitive recreational resource.

Figure 11.3a – shows PRoW network and site relationship plan



Figure 11.3b – Shows Site 8 with numbers representing viewpoints. These are shown below this map.



1







2



View from Boudica Way over Site 8a and 8b. In the centre is Market Lane Farmhouse, built circa 1850, is a mid-19th century rural dwelling that contributes to the historic character of Shotesham's agricultural landscape. Constructed in traditional Norfolk brick with a pitched clay tile roof, the house retains many original features, including timber doors, and exposed internal beams. Its location along the ancient origins of Market Lane, with uninterrupted views across the surrounding fields, exemplifies the relationship between vernacular rural buildings and the open agricultural setting typical of this part of Norfolk. While not formally listed, the property forms part of the ensemble of historic farmsteads that collectively define the character and sense of place of Shotesham.

3



Site 8b and Footpath 22 as seen from Boudica Way next to Little Wood

4



Possible visibility of solar panels from Footpath 18 behind Market Lane Farm, running from Boudica Way to Footpath 19. Panels will be placed from the horizon line of the sloping field

5



This chapter sits alongside the report completed and submitted to the Planning Inspectorate by [redacted]. CLASSIC LANDSCAPE ARCHITECTURE LTD

11.4 Assessment of Effects

The Proposed Development would introduce:

- Solar arrays and associated infrastructure
- Security fencing and access controls
- Increased visual enclosure

These would directly affect routes passing through or adjacent to the site.

Key effects include:

- Enclosure of routes by fencing and infrastructure
- Loss or filtering of open rural views
- Introduction of industrial and urbanising influences
- Reduction in tranquillity and sense of remoteness
- Changes to perceived safety and comfort

This represents a fundamental change from an open rural experience to a more confined and engineered environment.

11.5 Effects on User Experience

The impact on Public Rights of Way extends beyond physical access to the quality of experience.

The Proposed Development would result in:

- Reduced scenic quality
- Visual enclosure and confinement
- Increased perception of industrialisation
- Reduced sense of safety and comfort

For long-distance users, particularly along the Boudicca Way:

- Effects would be sustained over distance
- The continuity and enjoyment of the route would be diminished

The value of these routes lies in the experience of landscape, which would be materially degraded.

Community Evidence – Public Use and Value of the Landscape

Evidence gathered by Shotesham Action Group l demonstrates a high level of public use and value associated with the landscape surrounding Sites 8a and 8b. Over **500** individuals signed a statement confirming that they regularly use the public footpaths located south of Shotesham All Saints, including the Boudicca Way, to enjoy the countryside. It is notable that many users come from Norwich, particularly to enjoy the beautiful village and its surrounding countryside.

The statement records that the proposed solar development would be visible from approximately two miles of public footpaths and would fundamentally alter the character of the landscape. Signatories expressed clear objection to the development of over 120 acres of agricultural land based on its impact on landscape character and recreational amenity.

In a survey of users of the lanes and footpaths, nearly 200 responses were collected. From this survey, it is possible to show that users of the footpaths and lanes around and through Site 8a and Site 8b come from a range of localities and therefore demonstrates the use of this area for recreational activity.

Figure 11.5a – Shows the range of places where people who visit and use the lanes and footpaths regularly live.

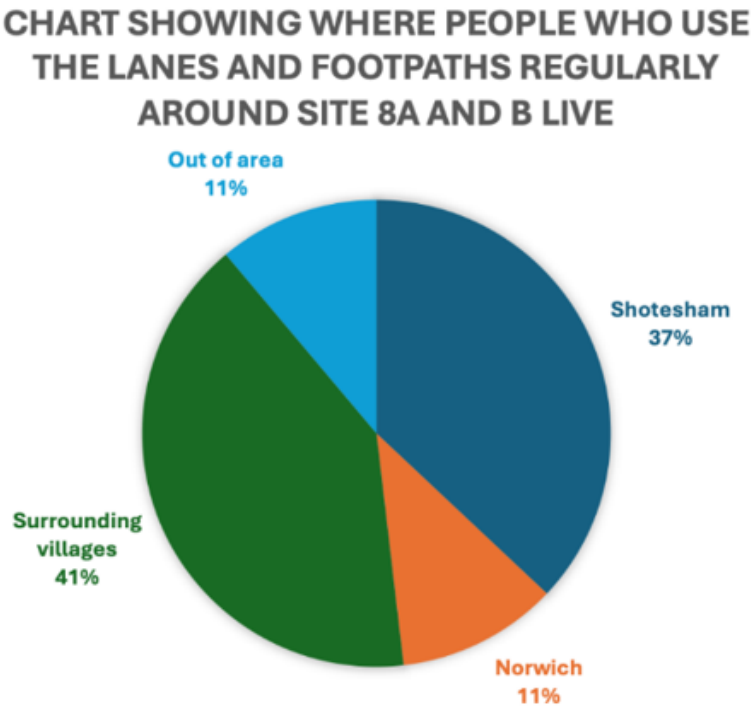
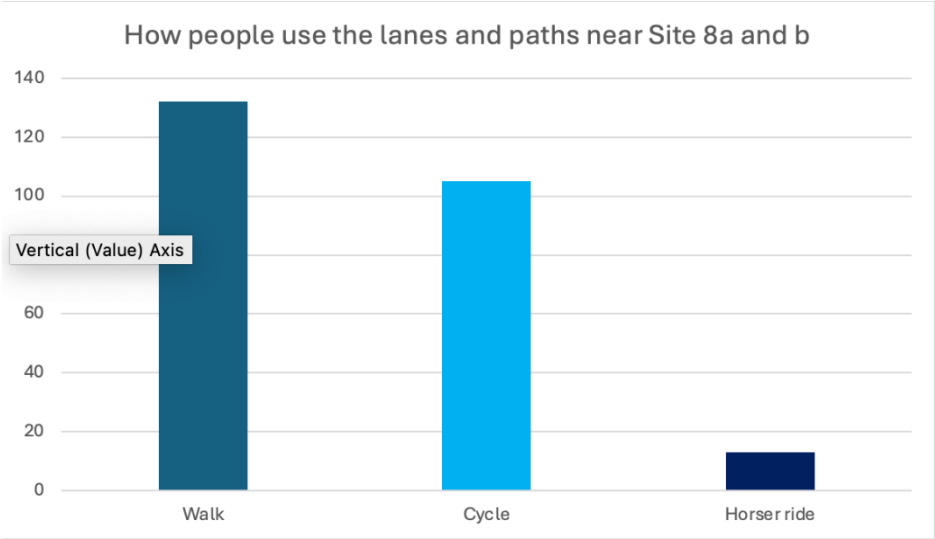


Figure 11.5b – Shows how the lanes and paths are used



Please note that not all the users will have completed the survey, as this was done using a QR code, and many walkers do not have cell phone service, and some are users of technology.

Figure 11.5c – Shows an image of an organised walk in Shotesham to raise awareness and objection to the proposed scheme. It was attended by over 200 people. Image is showing Footpath 22 on Site 8b



This evidence demonstrates that:

- The site forms part of a **valued landscape in active and regular public use**
- The **experience of Public Rights of Way is a key receptor**, not a secondary consideration
- The **magnitude of visual and amenity effects is widely experienced and socially significant**

The scale of response indicates a consistent and locally informed perception of harm, which is a material consideration in the assessment of effects on amenity, landscape, and quality of life.

11.6 Assessment Deficiencies

The assessment does not provide a robust evaluation of effects on Public Rights of Way users.

In particular, it fails to consider:

- Experiential and perceptual effects
- Sequential experience along routes
- Cumulative effects of enclosure and proximity to infrastructure
- Combined impacts across Sites 8a and 8b
- Interaction between visual, spatial, and sensory effects

As a result:

- The full extent of impact on users is not captured
- Effects are likely to be underestimated

11.7 Underestimation of Recreational Effects

The use of representative viewpoints does not reflect the real experience of users moving through the landscape.

In practice:

- Users would experience repeated and sustained exposure to development

- Effects would accumulate over distance
- Early-stage mitigation planting would not reduce impacts

Accordingly, the effect on recreational amenity is likely to be greater than indicated.

11.8 Summary of Effects

- Enclosure of footpaths and recreational routes
- Loss of openness and rural character
- Reduction in tranquillity and scenic quality
- Degradation of user experience and amenity
- Sustained effects along key routes
- Underestimation of impacts due to assessment limitations

11.9 Policy Conflict

The Proposed Development conflicts with:

- **NPS EN-1 §5.12** (amenity and quality of life)
- **National Planning Policy Framework** (recreation and environmental quality)

It has not been demonstrated that:

- Recreational amenity would be preserved
- User experience would be protected
- Effects can be adequately mitigated

11.10 Conclusion

The Proposed Development would result in a significant and harmful deterioration in the experience, amenity, and perceived safety of Public Rights of Way, including Footpaths 18, 19 and 22 and the Boudicca Way.

The evidence demonstrates that:

- Routes would become enclosed and industrialised
- The quality of user experience would be materially degraded
- Effects would be sustained and widely experienced
- The assessment fails to capture the full extent of impact

These impacts are significant, affect a highly sensitive receptor group, and have not been adequately assessed.

In the absence of a robust assessment, it cannot be concluded that harm would be avoided.

This conflict with national policy weighs against the inclusion of Sites 8a and 8b within the Proposed Development.

12. Transport and Access

12.1 Chapter Summary

This chapter assesses the suitability of the local road network and access arrangements serving Sites 8a and 8b.

It demonstrates that:

- The local road network is inherently unsuitable for development traffic
- HGV and AIL movements cannot be safely accommodated
- Market Lane is constrained, structurally weak, and subject to flooding
- The transport assessment omits key routes and impacts
- The access strategy relies on outline, post-consent measures
- The network is heavily used by vulnerable users
- Impacts on residents have not been assessed
- Mitigation would cause environmental harm
- A viable and less harmful alternative access exists but has not been considered

As a result, the Proposed Development would give rise to unacceptable highway safety risks and severe residual cumulative impacts.

12.2 Policy Context

Transport and access must comply with:

- National Planning Policy Framework §115 (refusal where there is unacceptable highway safety impact or severe cumulative impact)
- NPS EN-1 §5.14 (safe and suitable access)
- NPS EN-1 §§4.2.5 and 4.3 (adequate evidence and impacts on quality of life)

12.3 Baseline and Network Constraints

It is proposed that Sites 8a and 8b are served by narrow, unclassified rural roads including:

- Shotesham Road
- Woodton Road
- Heath Road
- Market Lane
- Wash Lane
- Baxter's Lane
- Brooke Road

These roads are characterised by:

- Narrow or single-track carriageways
- Sharp bends and restricted visibility
- Limited or no passing places
- Soft verges, drainage ditches, and culverts
- Poor structural capacity

They require verge overrun and reversing to pass and are unsuitable for large vehicles. Market Lane is also flood-prone and periodically impassable.

HGVs, vans and cars will follow the route from Church Road in Woodton, whilst cable drum deliveries using AIL, will follow High Green in Brooke to Heath Road.

An internal haul road is proposed to link site 8a with site 8b, which will be accessed via Baxter's Lane and Brooke Road. Woodton Road will have two access points serving sites 7k and 7l.

During an on-site meeting with [redacted], East Pye Solar's project officer, on 11 July 2025, we were informed:

"We know that Market Lane is not suitable to be used by works traffic."

This acknowledgment from the Applicant reinforces the risks identified in the transport assessment, including highway safety, potential damage to the lane, and impacts on residents and users of adjacent footpaths. It highlights the need for alternative access arrangements, as Market Lane cannot safely accommodate HGVs, abnormal loads, or construction-related traffic.

12.4 Suitability for Development Traffic

The road network is fundamentally unsuitable for HGV and AIL movements due to:

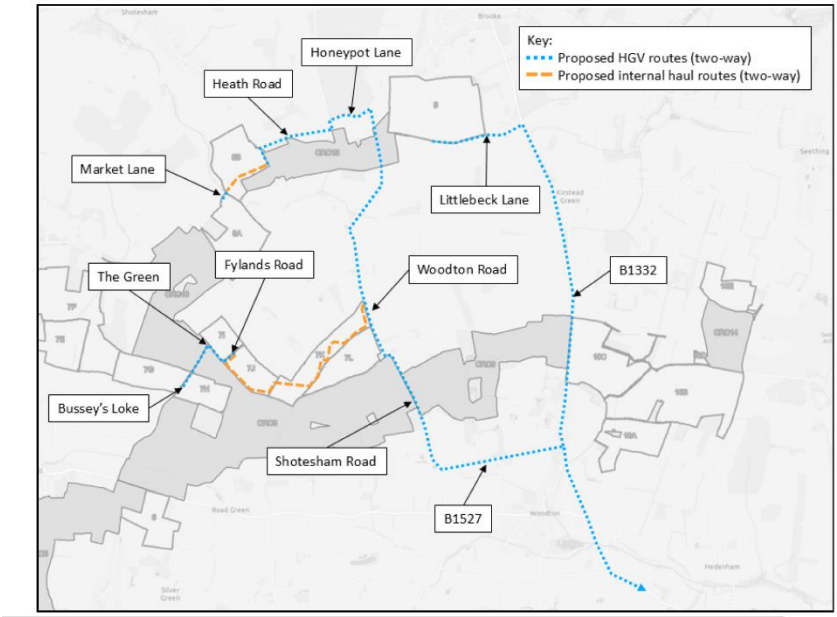
- Insufficient carriageway width
- Lack of passing places
- Alignment and visibility constraints
- Structural limitations of rural lanes

Safe access cannot be achieved without significant intervention. Likely effects include:

- Verge overrun and encroachment into ditches
- Accelerated road deterioration
- Increased risk of conflict and unsafe manoeuvres

Flooding further reduces capacity and reliability, creating inherent highway safety risks.

Figure 12.4a – shows the planned transport routes for East Pye Solar related to Site 7 and Site 8



Inconsistencies in the Access Strategy for Sites 8A and 8B

The Transport Assessment contains a number of inconsistencies regarding the proposed access arrangements for Sites 8A and 8B which call into question the necessity of using local rural lanes for construction traffic.

Table 4.1 identifies Wash Lane (Access A48) as a construction and operational access to Site 8A, Market Lane (Accesses A49 and A50) as construction and operational accesses to Sites 8A and 8B, Baxter's Lane (Access A52) as a construction and operational access to Site 8B, and Brooke Road (Access A51) as a construction and operational access to Site 8B. However, the routeing strategy set out in Table 6.1 does not utilise Wash Lane and instead routes traffic to Site 8A via Baxter's Lane, an internal haul route through Site 8B and Market Lane. The Applicant provides no explanation as to why Wash Lane remains identified as an access point if it is not intended to form part of the proposed routeing strategy.

The assessment is further undermined by the fact that neither Wash Lane nor Market Lane are individually described within Table 2.4 (Highway Network Description), despite both roads being included within the study area, surveyed as part of the baseline traffic assessment and proposed as access routes to the Scheme. The Transport Assessment therefore fails to provide a clear assessment of the physical characteristics and constraints of these roads, including carriageway widths, passing opportunities, visibility constraints and suitability for HGV traffic.

More fundamentally, the Applicant has failed to demonstrate why the use of Market Lane is required at all. If Wash Lane provides access to Site 8A and Baxter's Lane provides access to Site 8B, there appears to be no justification for construction traffic to also use Market Lane. Furthermore, if construction traffic accesses Site 8B from Brooke Road and then moves internally between Sites 8B and 8A using a dedicated haul route connection, there would appear to be no operational requirement for construction traffic to use Market Lane, Wash Lane or Baxter's Lane. The Applicant has not demonstrated why construction traffic cannot be contained within the site itself, thereby avoiding these constrained rural lanes altogether.

Given the acknowledged sensitivity of the local road network, the Examining Authority should require the Applicant to clarify the intended access strategy for Sites 8A and 8B, explain the role of Wash Lane within that strategy, and demonstrate why the use of Market Lane, Wash Lane and Baxter's Lane is necessary when alternative arrangements appear capable of avoiding these roads entirely.

Figure 12.4b – Shows a map of the proposed access route between Site 8a and Site 8b with numbered points, which have accompanying images below





Image 1 – Shows the section of hedge line identified in East Pye Solar's targeted consultation, belonging to Market Lane Farm. There are four large, old oak trees in this section. East Pye Solar have not been clear about how exactly they will make the visibility splay clear in this area.



Image 2 – Shows the approach to the corner of Market Lane identified in the transport plan. This is a blind bend and will have to have significant removal of old established hedgerows to improve visibility.



Image 3 – Shows the corner of Market Lane identified in the transport plan. The picture shows where there is a culvert over the stream. This is completely covered by flood water and the edges of the lane over the culvert are not visible.



Image 4 – Shows the surface of Market Lane identified in the transport plan. Since this image was taken, the road has been resurfaced. However, below the surface layer Market Lane is filled with potholes, areas where the camber of the lane is causing the tarmac to split and fall away from the centre of the road, and repeated ineffective repairs, which are destroyed and washed away in high rainfall.



Image 5 – Shows part of the verge identified in the transport plan. The verges on either side are Roadside Nature reserves. This is due to the presence of the plant species – Trifolium ochroleucon (Sulphur clover)grows.

It is classified as vulnerable on the Great Britain red list and an uncommon and highly localised plant in Norfolk

These are likely to be destroyed during the movement of HGV's

Additional issues with the use of the rest of Market Lane Farm.

Significant long-term concerns arise regarding Market Lane access

It is important to highlight that East Pye Solar have not included workers vehicles in their prposed transport routes.

Really concerningly, they have also left the access point for Site 8a and 8b on Market lane in the longer term. This raises major concerns:

- It is forseeable that site workers would come up the remainder of Market Lane.
- It is forseeable that HGV's could still use the rest of Market Lane, even though it isn't in the plan.
- Once completed HGV's would have to use the lane to bring water to site to wash the panels, as there will be no access to water on site 8. This is not considered in the plan.
- Other maintenance worker and vehicles would use Market Lane in the longer term, for site maintenance and landscaping
- No consideration of how panel replacement or dissassembling and removal of panels would occur.
- East Pye Solar, are creating a legacy of increased sustained traffic on Market Lane without even acknowledging this or making provision for it.

The series of images below are to demonstrate that Market Lane is not suitable to be used for these purposes.

Figure 12.4c – Shows an image of the bottom of Market Lane following heavy rainfall and the collapse of the side of the road.

This caused the road to be closed for several weeks



Figure 12.4d – Demonstrates clearly how narrow Market Lane is

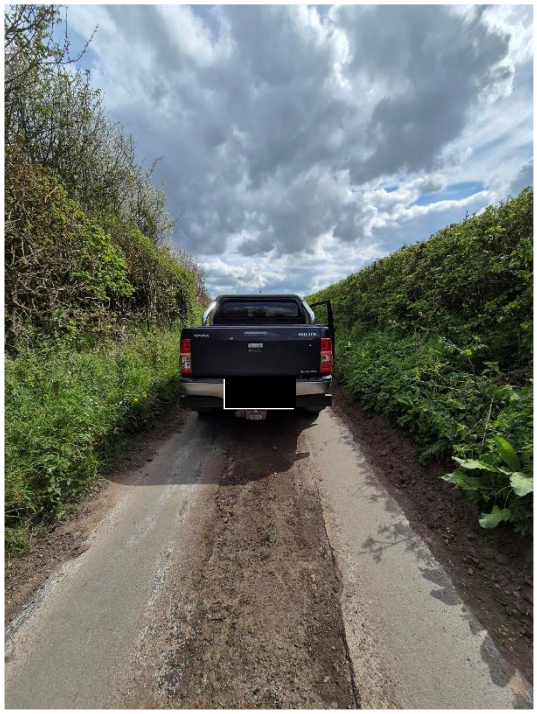
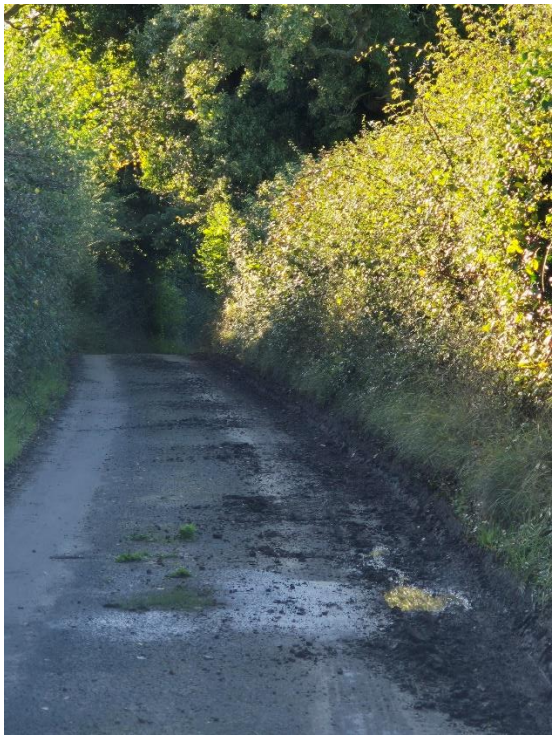
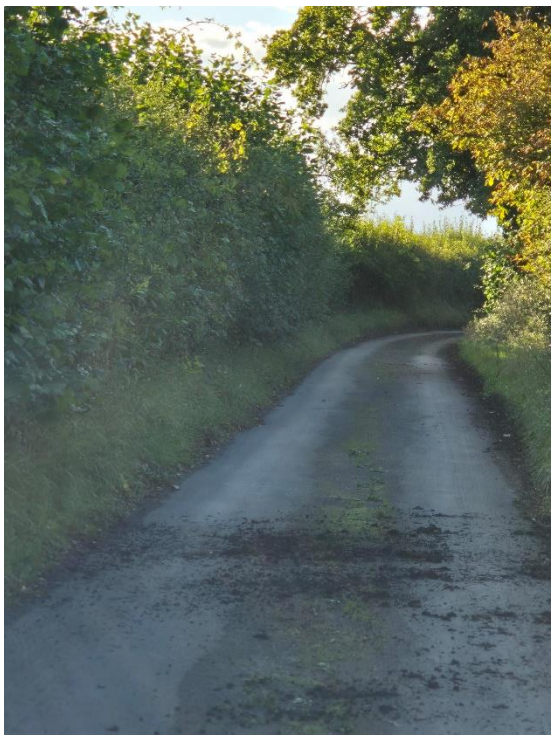


Figure 12.4e – Shows an example of one of the blind bends along Market Lane.

The lane is single carriage way, along the entire length of the lane. In a large section of lane, there are high sided banks. There are few passing places and in places to reach a passing place, it is necessary to reserve for some distance and around bends.

There is no room for horse riders to pass in these sections and cars have to stop and put their wing mirrors in to try and allow enough space for a pedestrian to pass them safely.

The mud that can be seen in *Figure 12.4d* is caused by the bin lorry that travels down the lane once a week. It cannot travel the lane without catching the verges on the side.

Figure 12.4e – Shows a section of Market Lane beneath Site 8b in the winter



Figure 12.4f – Shows a section of Market Lane between Market Lane Farm and Site 8b, with water on the lane.



Extensive amounts of water drain off Site 8b. This water is draining off Site 8b, even when the weather is fine and everything around is dry.

Figure 12.4g – Shows additional images of potholes and poor road condition on Market Lane

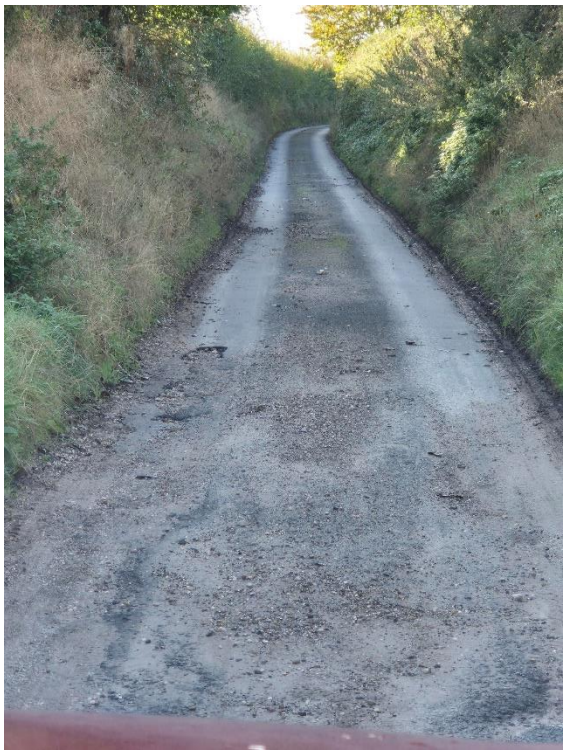




Figure 12.h – Shows another blind bend on Market Lane on the approach to Site 8b, which can be seen elevated on the left of the image.



12.5 Assessment of Effects

The Proposed Development would result in:

- Increased traffic on constrained rural lanes
- Conflict between vehicles and vulnerable users
- Increased accident risk and unsafe manoeuvres
- Pressure on already constrained infrastructure
- High levels of construction traffic on Shotesham Road in Woodton which is a single track, unclassified lane.

Flooding on Market Lane would:

- Reduce usable carriageway width
- Create hazardous conditions
- Prevent reliable access

12.6 Assessment Limitations and Mitigation

The Transport Assessment for Sites 8A and 8B contains significant omissions and inconsistencies that undermine confidence in the proposed access arrangements:

- Omissions in study area: Market Lane and Wash Lane are either omitted or not described in Table 2.4, despite being surveyed and identified elsewhere as construction and operational access points.
- Unassessed constraints: Narrow carriageways, limited passing opportunities, visibility, and flooding impacts on Market Lane, Wash Lane, and Baxter's Lane are not evaluated.

- Inconsistent routeing: Wash Lane is identified as an access to Site 8A, Baxter's Lane to Site 8B, yet the routeing strategy omits Wash Lane and relies on Market Lane and Baxter's Lane.
- Unjustified use of minor roads: If Site 8B traffic can access via Brooke Road and move internally to Site 8A using a proposed haul route and bridge, Market Lane, Wash Lane, and Baxter's Lane would not be needed.
- Deferred mitigation: Key details are left to post-consent CTMP/OTMP, leaving access arrangements and traffic management unsecured.
- Environmental consequences: Mitigation measures such as road widening, hedgerow removal, and drainage alterations would result in environmental harm and conflict with landscape and ecological objectives.

The Transport Assessment is therefore incomplete. Table 4.1 identifies Wash Lane (Access A48) as a construction and operational access to Site 8A, Market Lane (Accesses A49 and A50) as construction and operational accesses to Sites 8A and 8B, Baxter's Lane (Access A52) as a construction and operational access to Site 8B, and Brooke Road (Access A51) as a construction and operational access to Site 8B. However, the routeing strategy set out in Table 6.1 does not utilise Wash Lane, instead directing traffic to Site 8A via Baxter's Lane, an internal haul route through Site 8B, and Market Lane. No explanation is provided for this discrepancy.

More fundamentally, if construction traffic for Site 8B is routed from Brooke Road across Site 8B and over a proposed bridge connecting to Site 8A, there is no operational requirement for construction traffic to use Market Lane, Wash Lane, or Baxter's Lane. The Applicant has not demonstrated why traffic cannot be contained within the site itself, avoiding these sensitive rural lanes altogether. In addition, neither Wash Lane nor Market Lane are individually described within Table 2.4 (Highway Network Description), meaning the Transport Assessment fails to provide a clear record of their physical characteristics, constraints, and suitability for HGV traffic.

Given these omissions, inconsistencies, and lack of justification, the current Transport Assessment does not adequately demonstrate that the proposed access strategy is feasible, safe, or the least environmentally harmful.

12.7 Alternative Access Strategy and Amenity Effects

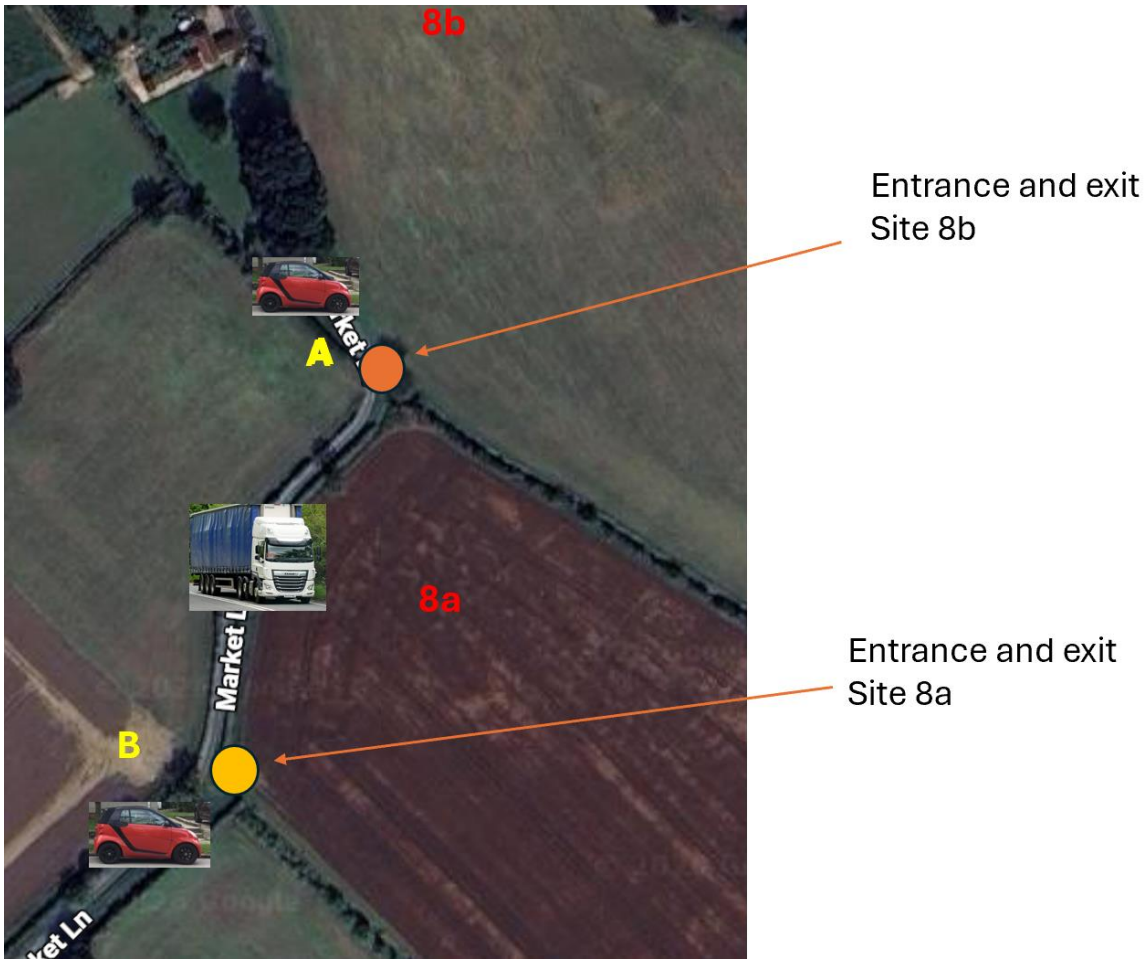
A viable alternative access strategy exists via:

- Access from Brooke Road
- A link between Sites 8a and 8b

This would:

- Avoid reliance on Market Lane, Baxter's Lane and Wash Lane
- Avoid flood-prone sections
- Reduce conflict with vulnerable users
- Reduce environmental harm

Figure 12.7a – Shows model of current strategy.



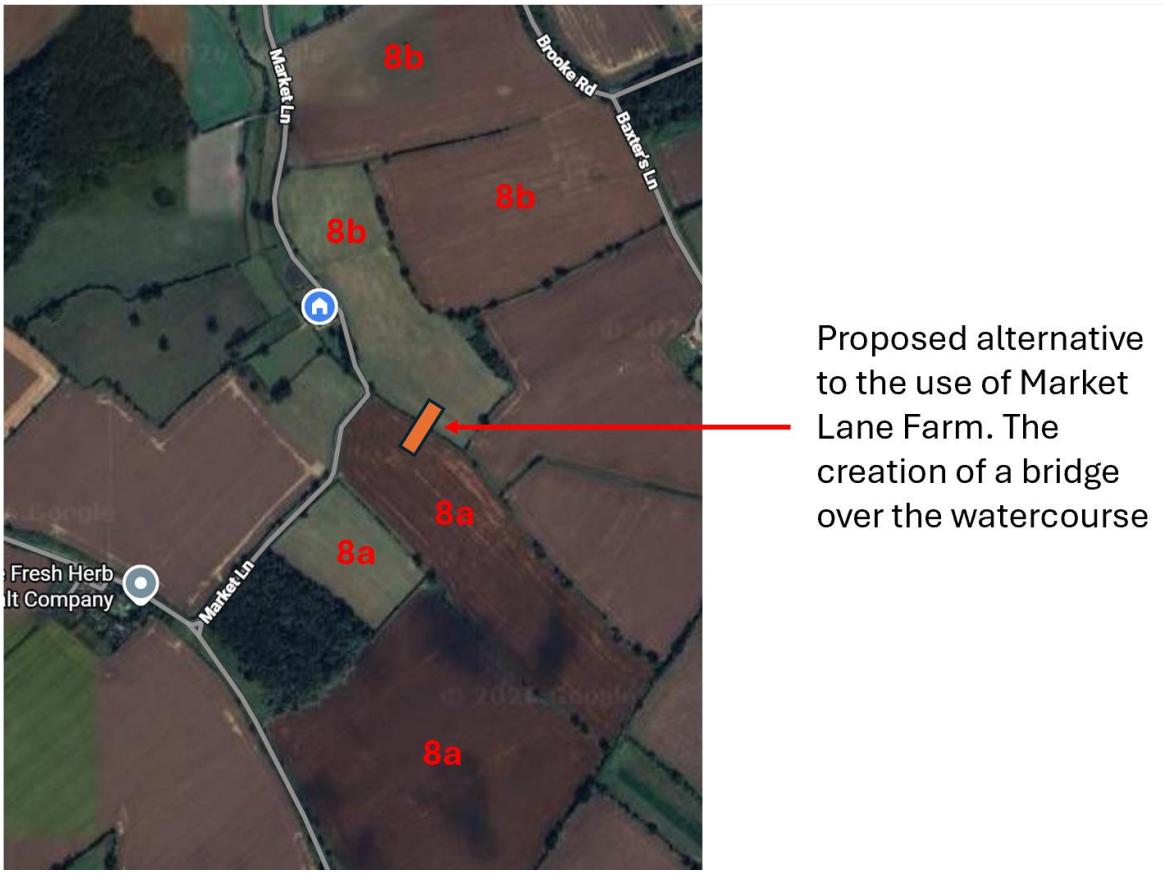
If cars get held up at A and B while HGV's are moving between Site 8a and 8b, how do the cars get past each other when the road is reopened?

This option has not been properly assessed.

The local road network is heavily used by:

- Walkers, cyclists, and horse riders
- Local residents

Figure 12.7b – Shows proposal for alternative access strategy



The Proposed Development would:

- Reduce safety for vulnerable users
- Increase disturbance and loss of tranquillity
- Affect residential amenity, including access and safety

12.7.1 Proposed Access Conditions (CTMP and OTMP)

The assessment above demonstrates that the local road network, in particular Market Lane and Wash Lane, and Baxter's Lane, is **unsuitable for HGV and AIL movements**, and that their use would give rise to **unacceptable highway safety risks** and **severe residual cumulative impacts**.

Conversely, access via Brooke Road provides a **feasible and materially less harmful alternative**, capable of accommodating development traffic without reliance on constrained rural lanes. The inclusion of an internal connection between Sites 8a and 8b, via a bridge across the intervening watercourse, would enable all site-to-site movements to occur off the public highway network.

Accordingly, if Sites 8a and 8b are to remain within the Proposed Development, it is **essential** that access arrangements are secured through **robust and enforceable Construction Traffic Management Plan (CTMP) and Operational Traffic Management Plan (OTMP) requirements**. These must ensure that development traffic avoids

unsuitable routes and that safe and suitable access is achieved in accordance with **NPS EN-1 §5.14** and **NPPF §115**.

The following requirements are therefore necessary to make the development acceptable in transport terms:

12.7.2 Proposed Access Conditions

To ensure compliance with policy and to prevent unacceptable highway safety impacts, if Sites 8a and 8b are to remain within the Proposed Development, it is **essential** that all construction and maintenance traffic uses Brooke Road as the sole access route.

The following CTMP and OTMP conditions are proposed to:

- Secure safe and suitable access in accordance with NPS EN-1 §5.14;
- Protect vulnerable road users and residents;
- Avoid severe cumulative impacts on Market Lane and Baxter's Lane.

Proposed CTMP and OTMP Requirements for Sites 8a and 8b

1. Access Routes

1. **Primary Access:** All construction and maintenance vehicles accessing Sites 8a and 8b must use **Brooke Road (A51)** as the sole entry and exit point.
2. **Prohibited Routes:** Market Lane and Baxter's Lane are prohibited for all HGVs and abnormal indivisible loads (AILs), except for the temporary cable crossing on Baxter's Lane.
3. **Internal Connection:** A bridge shall be constructed across the stream between Sites 8a and 8b to allow internal vehicle movements, eliminating the need to use Market Lane or Baxter's Lane for site-to-site traffic.
4. **Alternative Compounds:** Any storage or laydown compounds (e.g., currently proposed at A52 on Baxter's Lane) shall be relocated adjacent to Brooke Road to avoid traffic on constrained rural lanes.

2. Traffic Management Measures

1. **Signage:** Directional signage shall be installed at Brooke Road to indicate the exclusive route for all HGVs, AILs, and construction traffic.
2. **Speed Control:** Maximum speeds of 20 mph shall apply to all vehicles within the site and on adjacent approach roads to protect vulnerable road users.
3. **Route Monitoring:** GPS tracking of all HGV and AIL movements must be implemented to ensure compliance with approved access routes.
4. **Traffic Marshals:** Where site entrances intersect public roads, qualified traffic marshals must be present during peak movements to manage vehicle entry and avoid conflicts.

3. Resident and Vulnerable User Protection

1. **Notification:** Residents along the site access route shall be notified in advance of scheduled HGV deliveries and movements.
2. **Conflict Minimisation:** All vehicle movements must avoid school start/finish times and known peak pedestrian/cyclist periods where feasible.

3. **Barrier Protection:** Temporary barriers and pedestrian-safe zones shall be established at critical points near site entrances.

4. Monitoring, Compliance, and Enforcement

1. **Reporting:** Weekly reports on vehicle movements and any deviations from the approved route shall be submitted to the local highway authority or the relevant NSIP monitoring body.
2. **Incident Log:** Any incidents of HGV use on prohibited routes must be logged and reported immediately, with corrective measures implemented.
3. **Penalties:** Non-compliance (e.g., use of Market Lane or Baxter's Lane outside the cable crossing) shall trigger an immediate halt of site traffic until remedial action is verified.

5. Operational Phase (OTMP)

1. Maintenance vehicles must follow the same Brooke Road-only access strategy.
2. Site-to-site movements must continue to use the internal bridge to avoid Market Lane and Baxter's Lane.
3. Any operational deliveries requiring temporary access via Baxter's Lane (e.g., cable maintenance) must be approved in writing with prior notice to residents.

6. Implementation

1. This CTMP/OTMP condition shall be **incorporated into the DCO requirements** and be enforceable by the relevant authority.
2. No works on Sites 8a or 8b shall commence until the bridge design, site access, and traffic management plans are approved in writing.

12.8 Summary of Effects

- Unacceptable highway safety risks
- Severe impacts on a constrained rural network
- Increased risk due to flooding and unreliable access
- Environmental harm from required mitigation
- Conflict with vulnerable users
- Adverse impacts on residential amenity
- Underestimation of impacts due to assessment deficiencies

12.9 Policy Conflict

The Proposed Development conflicts with:

- NPPF §115
- NPS EN-1 §5.14
- NPS EN-1 §§4.2.5 and 4.3

It has not been demonstrated that:

- Safe and suitable access can be achieved
- Impacts on the road network are acceptable
- Residual impacts would not be severe

12.10 Conclusion

The evidence demonstrates that:

• The local road network serving Sites 8a and 8b is physically unsuitable for the scale and nature of development traffic proposed;

• HGV and AIL movements cannot be safely accommodated;

• Market Lane and Baxter's Lane are constrained rural lanes that are unsuitable for construction and operational traffic associated with the Proposed Development;

• Market Lane is further constrained by periodic flooding and unreliable access conditions;

• The transport assessment is incomplete;

• Operational and residential impacts are not assessed;

• A safe and deliverable access strategy has not been demonstrated; and

• A less harmful alternative has not been properly considered.

Taken together, these constraints demonstrate that Sites 8a and 8b are inherently unsuitable for inclusion within the Proposed Development and should be removed from the scheme.

A viable and materially less harmful access strategy exists via Brooke Road, with an internal connection between Sites 8a and 8b to avoid reliance on Market Lane and Baxter's Lane. However, this approach has not been secured or adequately assessed within the Proposed Development.

The Proposed Development would therefore result in:

• Unacceptable highway safety impacts;

• Increased conflict with vulnerable road users;

• Adverse effects on residential amenity; and

• Severe residual cumulative impacts.

In the absence of a secured Brooke Road-only access strategy, the Proposed Development cannot demonstrate safe and suitable access and would give rise to severe residual cumulative impacts, such that refusal is required in accordance with NPPF §115 and NPS EN-1 §5.14.

These impacts meet the policy threshold for refusal. Transport and access constraints therefore represent a fundamental and determinative reason for refusal and weigh decisively against the inclusion of Sites 8a and 8b within the Proposed Development.

Accordingly, Sites 8a and 8b should be removed from the Proposed Development. If the Examining Authority nevertheless concludes that the sites should remain, then Market Lane and Baxter's Lane should be excluded from all routine construction, maintenance and operational traffic movements, and a Brooke Road-only access strategy should be secured through enforceable requirements. In the absence of either outcome, the scheme should not be consented.

Chapter 13 – Noise and Vibration

13.1 Chapter Summary

This chapter demonstrates that:

- The receiving environment is highly sensitive to noise
- The Proposed Development would introduce continuous industrial noise into a quiet rural setting
- Residential receptors, including Market Lane Farm, are likely to experience significant adverse effects
- Users of local lanes and Public Rights of Way would experience a loss of tranquillity
- The assessment is based on assumed plant and indicative layouts, not a fixed scheme
- Impacts at or above significant adverse effect thresholds (SOAEL) are identified
- Vibration impacts, including effects on vulnerable structures, have not been assessed
- The assessment relies on uncertain, post-consent mitigation

As a result:

- The assessment is not robust or reliable
- The scale of impacts is uncertain and likely underestimated
- Significant adverse effects on amenity and quality of life cannot be ruled out

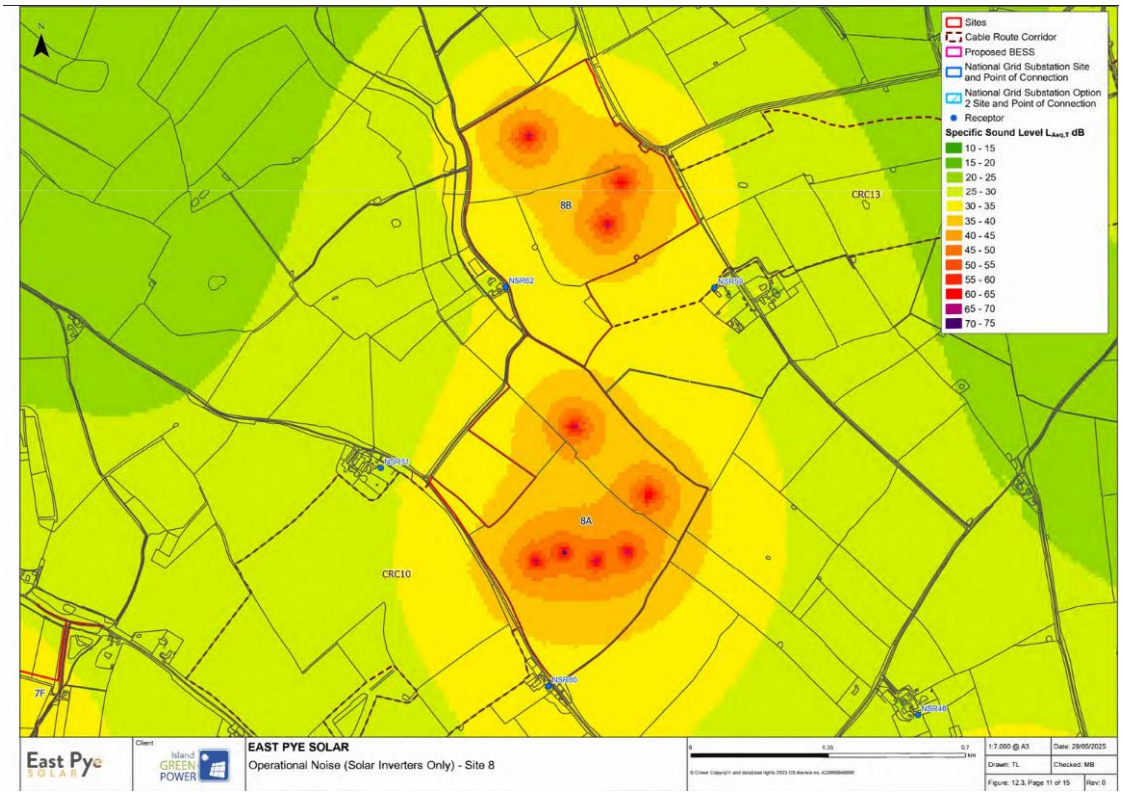
The proposal therefore conflicts with national policy.

Figure 13.1a – shows that East Pye Solar have identified themselves that receptors within the vicinity of Site 8 will be either moderately or majorly impacted by noise and vibration

East Pye Solar – Preliminary Environmental Information Report
Chapter 12 – Noise and Vibration

Receptor	Combined Rating Level at Receptor (dB $L_{Ar,15\ minutes}$)	Background Sound Level ($L_{A90,15\ minutes}$)	Excess of Rating over Background Sound Level	Preliminary Magnitude of Impact	Preliminary Significance of Effects
NSR54	29	33	-4	Negligible	Negligible
NSR55	29	33	-4	Negligible	Negligible
NSR56	29	26	+3	Minor	Minor
Site 8					
NSR58	27	21	+6	Moderate	Moderate
NSR59	30	22	+8	Moderate	Moderate
NSR60	32	22	+10	Major	Major
NSR61	29	22	+7	Minor	Minor
NSR62	31	21	+10	Major	Major

Figure 13.1b – shows that operational noise levels are likely to impact and be noticeable to residents of Market Lane Farm, Dawson's Farm and Baxter's Lane. Ambient sound levels are very low in these areas, and this would be massively impactful on wellbeing for those residents



13.2 Policy Context

Development must ensure that:

- Significant adverse effects on health and quality of life are avoided
- Residential amenity is protected
- Decisions are based on robust and reliable evidence

Relevant policy includes:

- NPS EN-1 §§4.2, 4.3 and 5.12 (Noise)
- NPPF §§174 and 185
- Noise Policy Statement for England (NPSE)

Where uncertainty exists, a precautionary approach is required.

13.3 Baseline Conditions and Sensitivity

Sites 8a and 8b lie within a quiet rural environment, characterised by:

- Very low background noise levels (approximately 18–28 dB LA90)

- Natural sound sources
- Minimal human activity

Key receptors include:

- Market Lane Farm (in close proximity to Site 8b) and Dawson's Farm (in close proximity to Site 8a)
- Other nearby dwellings
- Users of local roads, footpaths, and the surrounding countryside

In such conditions:

- Even small increases in noise are clearly perceptible
- Continuous mechanical noise represents a fundamental change in character

Receptor sensitivity is therefore high.

13.4 Assessment of Effects

Operational Noise

The Proposed Development would introduce:

- Continuous 24-hour noise from substations and BESS
- Persistent mechanical and electrical noise
- Potential tonal and low-frequency characteristics

At nearby receptors, this would result in:

- A continuous background hum
- A clear contrast with the existing rural soundscape
- A shift from natural to industrial acoustic character

The Applicant's own framework identifies thresholds for:

- Adverse effects (LOAEL)
- Significant adverse effects (SOAEL)

Given the very low baseline, predicted increases are likely to:

- Approach or exceed these thresholds
- Result in significant adverse effects at residential receptors

Effects on Residents

At Market Lane Farm, Dawson's Farm and nearby dwellings:

- Noise would be continuous and perceptible
- Rural tranquillity would be lost

- Residential amenity would be materially affected

Effects on Users of the Landscape

Users of the surrounding area would experience:

- Loss of tranquillity
- Introduction of a constant mechanical background sound
- A change in the character of the landscape

These effects would be experienced along:

- Local roads
- Public Rights of Way
- The wider countryside

Construction Noise

Construction activities would result in:

- Substantial increases in noise levels
- Clearly perceptible and intrusive effects
- Repeated disturbance over extended periods

This would result in temporary but significant adverse effects.

Vibration Effects

Vibration impacts have not been adequately assessed.

Construction activities, including:

- Heavy vehicle movements
- Groundworks and piling

have the potential to generate vibration.

Market Lane Farm is particularly vulnerable due to:

- Structural characteristics
- Proximity to access routes

No site-specific assessment has been undertaken.

13.5 Assessment Limitations

The assessment is affected by significant limitations, including:

- Reliance on assumed plant and indicative layouts
- Absence of a fixed and assessed design
- Dependence on post-consent mitigation
- Limited assessment of tonal and low-frequency noise
- Failure to reflect real-world acoustic conditions
- No robust assessment of vibration or receptor vulnerability

As a result:

- The full extent of impacts is uncertain
- Effects are likely to be underestimated

13.6 Summary of Effects

- Introduction of continuous industrial noise
- Loss of rural tranquillity
- Significant effects on residential amenity
- Adverse effects on users of the landscape and PRoW
- Potential vibration impacts on sensitive receptors
- Uncertainty regarding the effectiveness of mitigation

13.7 Policy Conflict

The Proposed Development conflicts with:

- NPS EN-1 §§4.2 and 4.3 (adequate evidence and mitigation)
- NPS EN-1 §5.12 (noise and quality of life)
- NPPF §§174 and 185

It has not been demonstrated that:

- Significant adverse effects would be avoided
- Residential amenity would be protected
- Impacts can be effectively mitigated

13.8 Conclusion

The Proposed Development would introduce continuous industrial noise into a highly sensitive rural environment, fundamentally altering its character.

The evidence demonstrates that:

- Residential receptors would experience persistent and perceptible noise
- Users of the surrounding landscape would experience a loss of tranquillity
- Vibration impacts remain unassessed
- The assessment is based on uncertain assumptions and unproven mitigation

It cannot be concluded that:

- Significant adverse effects would be avoided
- Amenity and quality of life would be protected

Applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm.

This uncertainty attracts substantial weight and weighs strongly against the inclusion of Sites 8a and 8b.

Chapter 14 – Glint and Glare

14.1 Chapter Summary

This chapter demonstrates that:

- Key receptors, including **Market Lane Farm** and the **Boudicca Way**, are not properly assessed
- The assessment relies on **theoretical modelling without real-world validation**
- The **duration and frequency** of glint and glare effects are not clearly quantified
- **Topography and visibility** are inadequately represented
- Mitigation is **assumed but not demonstrated or secured**
- **Worst-case and seasonal conditions** are not robustly assessed

As a result:

- The assessment is **incomplete and unreliable**
- The scale of impacts is **uncertain and likely underestimated**
- Significant adverse effects on **residential amenity and users of Public Rights of Way cannot be ruled out**

The proposal therefore conflicts with national policy.

14.2 Policy Context

National policy requires that environmental effects are **robustly assessed and evidenced**.

In particular:

- **NPS EN-1** requires decisions to be based on adequate evidence and a precautionary approach where uncertainty exists
- **NPS EN-3** requires identification of all sensitive receptors and proper assessment of glint and glare
- **NPPF** requires protection of amenity and landscape character

Where impacts are uncertain or not properly assessed, decision-makers cannot be satisfied that effects are acceptable.

14.3 Baseline Conditions and Sensitivity

Sites 8a and 8b lie within an **open rural landscape** characterised by:

- Long-distance views across a shallow valley
- High levels of visibility between receptors and the site
- Strong recreational use of the surrounding countryside

Key receptors include:

- **Market Lane Farm and Dawson's Farm**, located in close proximity to Site 8a and 8b
- Users of the **Boudicca Way**, a long-distance route with open views toward the site

These receptors are highly sensitive due to:

- Residential amenity and outlook
- Prolonged exposure and sequential experience (PRoW users)
- Expectations of tranquillity and rural character

14.4 Assessment of Effects

Effects on Residential Receptors

Market Lane Farm is identified elsewhere in the Environmental Statement as a **high-sensitivity residential receptor**, but is not clearly assessed within the Glint and Glare Assessment.

The assessment does not provide:

- A discrete receptor assessment
- Quantified duration or frequency of glare

- Robust analysis of visibility and orientation

Given:

- The **elevated position of Site 8b**
- The **direct line of sight across the valley**
- The **absence of established screening**

there is clear potential for glint and glare to affect **residential amenity**.

This impact remains **uncertain and unquantified**.

Effects on Public Rights of Way

The Boudicca Way passes through open countryside with **direct views toward Site 8b**.

Users of this route are highly sensitive due to:

- Prolonged and sequential exposure
- Open views and elevated vantage points
- Expectations of tranquillity

The assessment does not:

- Consider the **sequential experience of users moving along the route**
- Quantify **duration or frequency of glare events**
- Assess **how glare would be perceived in practice**

Given the openness of the landscape, users are likely to experience:

- Direct views of solar panels
- Potential reflected light under certain conditions
- A change in the experiential quality of the route

These effects are **material but not adequately assessed**.

14.5 Assessment Limitations

The assessment is affected by significant limitations, including:

- Reliance on **theoretical modelling without field verification**
- Failure to identify and assess **all sensitive receptors**
- Absence of quantified **duration and frequency of effects**
- Inadequate representation of **topography and visibility**
- Reliance on **unproven and unsecured mitigation**
- Failure to assess **worst-case conditions**, including winter scenarios

As a result:

- The full extent of impacts is **uncertain**
- Effects are likely to be **underestimated**

14.6 Summary of Effects

- Potential glint and glare affecting **residential receptors**
- Impacts on **users of the Boudicca Way and surrounding PRoW**
- Degradation of visual amenity and **rural character**
- Uncertainty regarding the effectiveness of mitigation

14.7 Policy Conflict

The Proposed Development conflicts with:

- **NPS EN-1** (adequate evidence and precautionary approach)
- **NPS EN-3** (assessment of glint and glare and receptor identification)
- **NPPF** (protection of amenity and landscape character)

It has not been demonstrated that:

- All sensitive receptors have been identified
- Effects have been properly assessed
- Impacts can be effectively mitigated

14.8 Conclusion

The Glint and Glare Assessment does not demonstrate that impacts on **residential receptors or users of Public Rights of Way** would be avoided.

The evidence demonstrates that:

- Key receptors, including **Market Lane Farm and the Boudicca Way**, are not properly assessed
- Effects are **not quantified in terms of duration or frequency**
- Mitigation is **uncertain and unproven**
- Worst-case conditions have not been assessed

It cannot be concluded that:

- Significant adverse effects would be avoided
- Amenity and user experience would be protected

Applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm.

This uncertainty attracts **substantial weight** and weighs **strongly against** the inclusion of Sites 8a and 8b.

Chapter 15 – Planning Balance

15.1 Introduction

This chapter assesses the planning balance in relation to the inclusion of Sites 8a and 8b within the Proposed Development. It draws together the evidence presented in earlier chapters, weighing the limited benefits of these sites against the range of adverse effects identified.

In reaching its recommendation, the Examining Authority must undertake an overall planning balance, weighing the benefits of the Proposed Development against its adverse effects. Where specific elements of a scheme give rise to significant and avoidable harm, it is appropriate to consider whether those elements are necessary to achieve the Scheme's objectives, particularly where their removal would result in only a limited reduction in overall function. This approach is consistent with NPS EN-1 paragraph 5.10.26, which recognises that a small reduction in scheme performance may be justified where it secures substantial environmental benefits.

15.2 Benefits of the Proposed Development

The Proposed Development as a whole contributes to:

- Renewable energy generation
- Reduction in greenhouse gas emissions
- Delivery of net zero objectives
- National energy security

However, Sites 8a and 8b comprise a small proportion of the scheme—less than 3% of the total development including solar arrays, BESS, and cable corridors. There is no evidence demonstrating that these sites are essential to achieving the scheme's objectives or that their removal would materially affect capacity, viability, or deliverability.

Conclusion: The specific contribution of Sites 8a and 8b to the overall benefits of the scheme is limited and attracts correspondingly limited weight in the planning balance.

15.3 Key Adverse Impacts

The evidence demonstrates that Sites 8a and 8b give rise to significant, cumulative, and site-specific adverse effects across multiple disciplines:

- Ecology & Biodiversity: Risk to protected and priority species, habitat loss and fragmentation, and uncertainty in mitigation measures.
- Water Environment & Hydrology: Increased runoff, flood risk, sediment and pollution pathways, and impacts on private water supplies.
- Soils and Agricultural Land: Soil compaction, degradation, and loss of productive land.
- Landscape and Heritage: Harm to the setting of heritage assets and sensitive landscape character.

- Transport and Access: Market Lane is constrained, single track, and unable to safely accommodate HGV movements without unacceptable impacts.
- Amenity: Disruption to residents, walkers, horse riders, and users of Public Rights of Way.
- EIA and Assessment Deficiencies: Incomplete baseline data, reliance on assumed mitigation, and deferral of key environmental information increase uncertainty across all topic areas.

These impacts are inherent to the sites and cannot be mitigated without significant residual harm.

15.4 Alternatives and Proportionality

Evidence demonstrates that:

- Alternative configurations exist that would avoid or reduce reliance on Sites 8a and 8b.
- These sites constitute only a small portion of the overall scheme.
- Removal of Sites 8a and 8b would substantially reduce environmental harm while having negligible effect on the delivery of scheme benefits.

Conclusion: The inclusion of Sites 8a and 8b is disproportionate to the limited benefits they provide.

15.5 Planning Balance

Benefits:

- Renewable energy generation attracts substantial weight, but the contribution of Sites 8a and 8b is minor.

Harms:

- Significant adverse environmental effects across multiple disciplines
- Failure to comply with EN-1 assessment and mitigation requirements
- Conflict with EN-3 site selection principles
- Residual uncertainty due to EIA deficiencies

Overall: The harms arising from Sites 8a and 8b clearly outweigh their limited benefits. The sites are not essential to the delivery of the scheme and their inclusion results in disproportionate environmental harm.

15.6 Conclusion

The evidence shows that Sites 8a and 8b:

- Give rise to cumulative, site-specific, and substantial adverse effects
- Are not required for the delivery of the Proposed Development
- Have less harmful alternatives available

Recommendation: Sites 8a and 8b should be removed from the Order Limits of the Proposed Development. Their exclusion represents a proportionate, reasonable, and deliverable approach, reducing harm while preserving the scheme's overall benefits.

Chapter 16. Conclusion

16.1 Summary of Findings

The evidence presented throughout this document demonstrates that Sites 8a and 8b:

- Form part of a highly sensitive environmental and historic landscape.
- Are subject to multiple, overlapping, and interacting constraints.
- Give rise to significant adverse impacts across numerous topic areas, including landscape, heritage, ecology, hydrology, transport, amenity, and noise.

These impacts are both site-specific and inherent, arising from the location and characteristics of the land.

16.2 Compliance with National Policy

The Proposed Development at Sites 8a and 8b fails to demonstrate compliance with key provisions of national policy, including:

- National Policy Statement EN-1 (Sections 4.2, 4.3, 5.4, 5.8, 5.9 and 5.10).
- National Policy Statement EN-3, in respect of site selection and efficient land use.

It has not been demonstrated that:

- Environmental impacts have been properly and robustly assessed.
- Adverse effects have been avoided, minimised, or effectively mitigated.
- The site represents an appropriate, suitable, or necessary location for development.

Accordingly, the requirements of the relevant policy framework have not been met.

16.3 Necessity and Alternatives

The Examining Authority is invited to give significant weight to the following:

- Sites 8a and 8b are not required to deliver the overall objectives of the Proposed Development.
- Their contribution to total generating capacity is limited.
- Alternative configurations of the scheme are clearly feasible and

The removal of Site 8 would:

- Not materially affect the delivery of scheme benefits; but
- Substantially reduce environmental harm and policy conflict.

This represents a proportionate and reasonable alternative.

16.4 Overall Reliability of the Environmental Statement

The Environmental Statement demonstrates a consistent pattern of:

- High-level assessment.
- Reliance on assumed mitigation.
- Deferral of key details to post-consent stages.

Across multiple topics, potential impacts are identified but subsequently minimised through assumptions rather than robust evidence. This results in a body of environmental information that is affected by uncertainty and is likely to underestimate the true extent of impacts.

In these circumstances, the decision-maker cannot be satisfied that the effects of the Proposed Development have been fully or properly assessed. Accordingly, the Environmental Statement should be afforded limited weight in the overall planning balance.

Drawing together the key findings across topic areas, the planning balance is summarised in the table below, highlighting the relative weight of harms and benefits associated with Sites 8a and 8b.

16.5 Overall planning balance

Drawing together the evidence presented across all topic areas, Sites 8a and 8b give rise to multiple, interacting adverse effects. The following table consolidates the key findings from Chapters 5–15, highlighting the relative weight of harms, policy conflicts, and residual uncertainties alongside the limited benefits associated with these sites. This table is intended as a concise reference for decision-makers, showing how the cumulative evidence informs the overall planning balance.

Figure 16.5a – Planning balance table

Topic Area	Key Adverse Impacts	Policy Conflict / Weighting	Residual Uncertainty
Ecology & Biodiversity	Significant risk to barbastelle bats, farmland birds, aquatic species; fragmentation of habitat networks	Habitats Regulations 2017, NPS EN-1 §5.4, NPPF biodiversity protection	Incomplete baseline, unproven mitigation
Water Environment & Hydrology	Increased runoff, flood risk, sediment/pollution impacts, effect on private water supplies	NPS EN-1 §§4.2, 4.3, 5.15; NPPF; Water Framework Directive	No site-specific modelling, partial receptor assessment
Private Water Supply & Groundwater	Contamination risk to Market Lane Farm borehole	NPS EN-1 §§4.2.5, 4.3.2, 4.3.3, 5.15.8; NPPF	No hydrogeological assessment, deferred investigation
Soils & Agricultural Land	Compaction, long-term degradation, loss of Best and Most Versatile land	NPS EN-1 §§4.2.5, 4.3.3, 5.15.8; NPPF §§174, 180, 181	Limited baseline, mitigation uncertain
Cultural Heritage	Harm to setting of Shotesham Conservation Area; fragmentation of historic landscape	Section 72 Planning (Listed Buildings & Conservation Areas) Act 1990; NPS EN-1 §5.8; NPPF	Partial assessment of setting, mitigation ineffective
Landscape & Visual Impact	Industrialisation, loss of openness, disruption of historic field patterns, long-term visual harm	NPS EN-1 §5.10; NPPF	Limited cumulative assessment, mitigation partially effective
Transport & Access	Unsuitable roads for HGV/AIL, highway safety	NPS EN-1 §5.14; NPPF §115	Market Lane omitted, outline mitigation,

Topic Area	Key Adverse Impacts	Policy Conflict / Weighting	Residual Uncertainty
	risk, severe residual impacts		alternative access unassessed

Overall Assessment: The cumulative weight of harms, policy conflicts, and residual uncertainties **substantially outweighs any site-specific benefits**, particularly given that Sites 8a and 8b are **not essential to the delivery of scheme objectives**.

16.6 Overall Conclusion

Drawing together the evidence presented:

- The benefits of the Proposed Development are acknowledged and attract significant weight, but are **not dependent on the inclusion of Sites 8a and 8b**.
- Inclusion of Site 8 results in **significant, wide-ranging adverse impacts**, **policy conflict**, reliance on **uncertain mitigation**, and **lack of robust assessment**.

In these circumstances, the inclusion of Sites 8a and 8b is **not justified in planning terms**.

16.7 Recommendation to the Examining Authority

For the reasons set out above, the Examining Authority is respectfully requested to recommend that:

- Development Consent is **not granted** for Sites 8a and 8b; and
- The Order Limits are **amended to exclude these areas**.

This represents the most **appropriate, proportionate, and policy-compliant outcome**.



We recognise that this objection is lengthy, but the detail reflects the seriousness of our concerns and our commitment to protecting our community, heritage, landscape, and environment. It also reflects the strength of feeling within the village and the passion that local people have for Shotesham, its surrounding countryside, and the conservation of the wildlife and ecology that make this area so special.

While prepared by residents rather than planning professionals, we have sought to present the evidence clearly, thoroughly, and in good faith. We trust that the Examining Authority will give careful consideration to this submission and to the concerns of those who know, value, and care for this landscape most closely.