East Pye Solar – Deadline 2 Written Submission

Planning Inspectorate reference: EN0110014
Family representation concerning [redacted] near Shotesham All Saints
Deadline: Tuesday 27 October 2026

Submitted jointly by [redacted] Jill Guy ([redacted]), [redacted] Christopher Guy ([redacted]), and [redacted] Cameron Guy ([redacted]). This joint representation is made on behalf of three individual objectors, each with an individual reference number; all three of us reside at [redacted].

1. Introduction

We submit this Deadline 2 representation in relation to the proposed East Pye Solar development, with particular reference to Sites 8A and 8B and the effect on our home, [redacted].

We have lived at [redacted] for 11 years and have no intention of moving. Our home is less than [redacted] metres from the boundary of Site 8; Site 8B lies immediately beyond [redacted] and Site 8A is approximately [redacted] metres from the boundary. The effects on us are therefore not abstract or temporary inconveniences: the development would change the setting and experience of our home, and the land around it, for years to come.

We support renewable energy in principle. Our objection is to the choice of this location and the concentration of impacts on residents and the local environment. We have already set out our detailed concerns in our Deadline 1 representation. This submission focuses on material points arising from the Applicant's later submissions and the examination documents.

I have also submitted alongside this submission the original document that was submitted by Shotesham Parish Council, as it contains a significant amount of maps and images which are relevant to this submission. It also contain extensive details on the concerns around Site 8, which do not seem to have been adequately addressed in any way by East Pye Solar.

AI declaration: ChatGPT (OpenAI) was used to assist with the drafting, organisation and refinement of this Written Representation. It was provided with the East Pye Solar application and examination documents, ExQ1, supporting reports cited in this representation, and information and personal experiences provided by myself. I have checked and approved the final content and remain responsible for the representation.

2. The effect on our home and its setting

The Applicant's response to Shotesham Parish Council (EXAM/9.21) acknowledges the presence of an isolated dwelling along the Site 8B boundary on [redacted]. It also describes areas of rising land near homes being excluded from development because of visibility. This does not resolve the fundamental issue for us: our home is exceptionally close to the proposed development, and the remaining panels, infrastructure, construction activity and associated traffic would still be experienced at close range.

The Applicant's landscape material and the South Norfolk District Council Statement of Common Ground recognise that significant adverse landscape and visual effects would remain during construction and early operation, with mitigation planting reducing effects over time. Planting cannot immediately restore the existing outlook or remove the experience of construction and infrastructure close to our home.

[redacted] site-specific landscape evidence is discussed in section 5.1. Here, our concern is that the effects on our home should be assessed as those on a distinct residential receptor, taking account of the exceptional proximity of the development and the experience of the property during construction and before mitigation matures.

We therefore ask the Examining Authority not to rely solely on broad landscape character assessments or on the fact that the dwelling is not itself within the application boundary.

Absence of a property-specific residential visual amenity assessment

Although the Applicant's visual assessment includes viewpoint VL4 on [redacted] south of [redacted] we are concerned that this does not adequately address the private visual amenity of our home and garden. Our property is less than [redacted] metres from the Site 8 boundary, with proposed development on both sides of [redacted]. A roadside viewpoint cannot necessarily represent the outlook experienced from the house, garden and other parts of the residential curtilage, or the combined effect of the proposed development at such close proximity. We have not identified a separate Residential Visual Amenity Assessment (RVAA) specifically examining [redacted]. We recognise that a separate RVAA is not automatically required for every nearby dwelling; however, given the exceptional proximity of Site 8, we ask the Examining Authority to establish whether the Applicant has adequately assessed the effects on our home and its private living environment, rather than relying on a general LVIA or a roadside viewpoint alone. If this has not been adequately assessed, we ask the Examining Authority to seek a proportionate, property-specific assessment addressing views from the house and garden, the proposed development on both sides of the lane, the construction and operational phases, and the extent to which proposed planting would genuinely mitigate those effects over time.

3. Flooding, drainage, soil permeability and our private water supply

Flooding is a lived and recurring issue at [redacted]. During heavy rain, almost all of our land floods, while the house and garden remain above the affected area. We are concerned that construction, ground preparation, tracks, panel supports, cable routes and drainage infrastructure could alter existing flow paths, increase runoff or redirect water towards areas that currently remain unaffected. The consequences of a change to drainage would be serious for our property and land.

This existing flooding is also documented in the photographs and site-specific evidence included in our detailed submission, "Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b)", submitted through Shotesham Parish Council during the examination. In particular, Chapter 6, sections 6.3–6.6 (pages 34–35), addresses the River Tas catchment, existing flooding and the flow path through the grounds of [redacted]. We ask the Examining Authority to read that evidence alongside the Applicant's Flood Risk Assessment and its assumptions about soil permeability, runoff and drainage. The photographs record the existing conditions and help explain why site-specific assessment is necessary; we do not suggest that photographs of existing flooding alone prove that the development would increase flood risk.

The Norfolk County Council Statement of Common Ground (EXAM/9.4) records continuing concerns about watercourses, floodplain processes and the wider water environment. Matters identified include watercourse crossings, horizontal directional drilling and breakout risks, ordinary watercourses, pollution and spill management, groundwater protection and the adequacy of embedded mitigation. These are material issues, not minor details, and they reinforce the need for a site-specific and demonstrably effective approach.

The Environment Agency Statement of Common Ground (EXAM/9.6) also discusses groundwater protection and private water supplies, including the need to identify water wells and consider groundwater receptors. We have a private drinking-water borehole close to Site 8B. We need clear assurance that its location, source and vulnerability have been properly assessed and that construction and operation cannot compromise the quality, quantity or reliability of our drinking water.

Our detailed Site 8 representation measures our borehole as approximately [redacted] metres from Site 8B. Separately, the Applicant's Phase 1 Ground Conditions Assessment records a private water-supply entry approximately [redacted] metres south-west of Site 8B. These figures may refer to different reference points; the Applicant should identify and assess our actual borehole accurately on the relevant plans. Our detailed representation also explains that the property lies downstream of runoff from Sites 8A and 8B. The Parish Council submission identifies the site's relationship to the River Tas catchment, groundwater vulnerability and Source Protection Zone 3. These are reasons for a site-specific hydrogeological assessment, not proof by themselves that contamination will occur. We ask the Applicant to establish an appropriate pre-construction

baseline for water quality and supply, assess credible pollution pathways and explain what monitoring, notification, alternative supply and remediation would be provided if the supply were affected.

The Environment Agency's Statement of Common Ground is particularly important here. In EXAM/9.6, Revision 1, October 2026, item EA WE–12 (page 19) records the EA's concern that the Environmental Statement's residual-effects assessment for construction and decommissioning considered water-supply quantity but omitted potential water-quality effects from spills, leaks and other pollutant releases affecting public and private abstractions. The Applicant acknowledges this omission and says it will be corrected at a later deadline, while maintaining that residual effects would remain not significant with the proposed mitigation. Item EA WE–13 (page 20) records concerns about the accuracy of the description of Source Protection Zones and the sensitivity assigned to private groundwater abstractions. The Applicant acknowledges errors and says corrections will be made at a later deadline. Both matters are marked "Under Discussion" in this version of the Statement of Common Ground. We have not located a later revised Chapter 9 demonstrating that these corrections were made. That does not prove that no later submission exists, but the Examination should not assume that the promised corrections have resolved the issues without identifying and checking the relevant updated material. Until that is demonstrated, the original conclusion that residual effects on water supplies are not significant cannot be relied upon as a complete, site-specific assessment of our drinking-water supply.

The EA's comments are not confined to the wording of the water-supply assessment. EXAM/9.6 also records unresolved questions about the Flood Risk Assessment, including panels proposed within the floodplain at the north-west of Site 8A, temporary works in the floodplain and the treatment of culverts. These matters are directly relevant to our experience of flooding at Market Lane Farm and to the route by which water drains from Sites 8A and 8B towards the River Tas catchment. They reinforce the need for the Applicant to demonstrate, with site-specific evidence, how floodplain storage and conveyance, existing flow paths and culvert performance would be maintained during both construction and operation. We do not suggest that the EA's recorded concerns alone establish that flooding will worsen; rather, they show that important aspects of the assessment required further clarification and should not be treated as settled without evidence.

The EA also sought more detailed water-quality monitoring, including in-situ checks and laboratory testing. We ask that any monitoring commitment be specific and enforceable, rather than left as a general promise for later plans. Before construction, the Applicant should establish a suitable baseline for our private borehole and relevant surface-water receptors; identify monitoring locations, parameters, frequency and reporting arrangements; set clear trigger levels and stop-work requirements; and specify prompt notification, provision of an alternative drinking-water supply where necessary, investigation and remediation if deterioration is detected. The monitoring plan should cover credible incidents and wet-weather conditions, and its results should be available to the relevant regulators and affected residents. Monitoring is not a substitute for a proper assessment or effective preventative measures, but it is an essential safeguard where the consequences of failure could affect our drinking water.

An outline drainage strategy is not, by itself, proof that the risks to our particular property and borehole have been resolved. We ask that the Examining Authority establish whether the assessment uses reliable local evidence, accounts for existing flood behaviour and cumulative effects, and secures enforceable measures for monitoring, prevention and remediation. Any mitigation must be capable of protecting our home and water supply in practice, not simply be left to later design without clear parameters.

We are particularly concerned that the Applicant's description of mitigation does not explain, in practical and site-specific terms, how water and any contaminants would be prevented from reaching our property. The land at Sites 8A and 8B drains towards us and the local watercourse. In these circumstances, it is not enough simply to list measures such as drainage features, silt traps, pollution-control procedures or emergency response plans. The Applicant should demonstrate how those measures would intercept and contain runoff across the relevant catchment, including during intense or prolonged rainfall, when the ground may already be saturated and flows may exceed the conditions for which the measures were designed.

This is also a pollution and public-health concern, not solely a question of flood levels. If fuel, oils, chemicals, concrete washout, sediment or other contaminants were released during construction, how exactly would the

Applicant prevent them from being carried downhill into our soil and paddocks, the stream and our private drinking-water borehole? What physical containment would be in place between the source and these receptors; how would it operate in wet weather; who would inspect and maintain it; and what would happen if it failed or was overwhelmed? The documents should identify credible failure scenarios, trigger points for stopping work, monitoring locations and frequency, notification arrangements, and a funded, enforceable remediation plan.

3.1 The Applicant's assumptions about solar-panel runoff

The Applicant's Flood Risk Assessment and Outline Surface Water Drainage Strategy (ES Volume 3, Appendix 9.1, Revision 2, APP/6.3.9.1, sections 9.4 and 9.6) states that the majority of the scheme consists of solar arrays raised on narrow supports and assumes that rainfall will drip onto the ground and naturally percolate. Section 9.6.1 says runoff will fall through gaps between panels in multiple locations, approximating baseline conditions; section 9.6.4 relies on vegetated grass or wildflower meadow beneath and between rows to maintain the current hydrological response.

However, section 9.4.7 acknowledges the high clay content and depth of Diamicton deposits and states that infiltration features are not considered appropriate at this stage without site-specific infiltration testing. Section 9.4.8 says the feasibility of shallow infiltration features would be verified through later ground investigations and testing. This raises an important question: the strategy relies substantially on natural percolation beneath the panels, while also acknowledging that infiltration cannot be assumed to be feasible without testing. The implications of this uncertainty need to be demonstrated for Sites 8A and 8B, rather than left unresolved.

The potential for solar panels to alter the distribution of rainfall at ground level is documented in the Welsh Government's evidence review, *The impact of solar photovoltaic (PV) sites on agricultural soils and land quality*. Section 2.4.4 (p. 11) identifies the potential for runoff from panels to compact soil at their base and for concentrated flows to form rivulets, rills and gullies. Importantly, Figure 6 provides a photograph captioned "Channels created by panel runoff within 12 months of site operation commencing", demonstrating that such channels have been observed at an operational solar site (Welsh Government, 2023, Work Package Three: Review of Impacts, section 2.4.4 and Figure 6, p. 11). This evidence reinforces our concern that the effects of panel runoff, soil compaction and changes to infiltration must be assessed in the actual ground conditions at Sites 8A and 8B. Given the existing flooding across our land, we ask the Examining Authority to require clear, site-specific evidence demonstrating how runoff will be managed and how the risk of water being concentrated or redirected towards Market Lane Farm will be avoided.

Source: Welsh Government (2023), *The impact of solar photovoltaic (PV) sites on agricultural soils and land quality: Work Package Three — Review of Impacts*, section 2.4.4 and Figure 6, p. 11.

The assumption that vegetated ground will maintain existing runoff behaviour also depends on the soil retaining its structure and permeability. It does not, by itself, establish how runoff will behave if construction traffic compacts the soil, if a haul road changes local levels, or if flows are concentrated or redirected.

3.2 Soil compaction and the internal haul road

The Applicant acknowledges in Appendix 9.1, section 9.12.1, that construction activities can alter surface-water runoff patterns through above-ground obstructions and ground compaction resulting from vehicle activity. The Outline Construction Traffic Management Plan (APP/7.6, Revision 2, October 2026), section 3.2.5, says temporary internal haul routes will generally be constructed from hardcore or gravel over a levelling layer of substrate, predominantly MOT Type 1 stone. Aluminium trackway or similar ground-protection mats may be used where permissible. Section 3.2.6 states that final alignment will be confirmed through detailed design. The routes are intended to be removed and the land reinstated after construction.

Appendix 9.1, section 9.7.10, nevertheless concludes that there is a low risk of excessive traffic-related soil compaction affecting track permeability. In the material we have reviewed, we have not identified a site-specific assessment demonstrating the basis for that conclusion at Sites 8A and 8B, taking account of the proposed construction traffic, haul-road formation, soil conditions and subsequent reinstatement.

There is a distinction between the permeability of a finished gravel track and the permeability of the surrounding agricultural soil. A gravel track may allow some water to pass through it, but that does not establish that the underlying soil will remain uncompacted, or that runoff from the track and adjacent land will follow the same paths as before. Repeated vehicle movements, ground preparation and the construction of a stone base could affect the soil beneath and beside the route. The extent of any effect depends on ground conditions, construction methods and traffic loading, and should be assessed rather than assumed.

Nor should removal of a temporary route and reinstatement of the land automatically be treated as proof that the original soil structure, infiltration capacity and drainage function will be restored. The Applicant should identify the method and measurable standards for reinstatement, and how successful restoration will be verified.

These issues are particularly material at our property because of the local topography, our existing drainage difficulties and the connection between the land and watercourses draining towards the River Tas. If infiltration is reduced or runoff is concentrated or redirected, the consequences may extend beyond the footprint of the haul road itself, potentially increasing erosion, sediment mobilisation or localised flooding. We do not suggest that a particular increase in runoff has already been proved; our concern is that the relevant effects have not been demonstrated to have been adequately assessed for our sites.

3.3 What the drainage modelling does and does not demonstrate

In its response to the Examining Authority's First Written Questions (EXAM/9.2, pages 217–219), the Applicant describes InfoDrainage modelling for certain BESS and substation infrastructure, further modelling for selected substations, and conceptual drawings showing access-track swales, directions of fall and indicative outfalls. The Applicant also states that final drainage layouts, discharge locations and hydraulic calculations depend on further design refinement, intrusive testing across the Order Limits and design evolution.

We recognise that drainage modelling has been undertaken for some elements of the wider scheme. However, modelling selected substations is not the same as quantitatively assessing the combined effects of the solar arrays, construction-related compaction and the internal haul road on runoff from Sites 8A and 8B. The material reviewed does not establish that the combined effects have been modelled for our particular sites, including runoff rates, volumes, flow velocities, altered flow paths and downstream flood risk.

We ask the Examining Authority to establish what site-specific investigations and infiltration tests have been undertaken or are proposed at Sites 8A and 8B; what evidence supports the conclusion that compaction risk is low; whether the combined effects of arrays, haul-road construction and compacted ground have been modelled; what measurable standards and verification procedures will demonstrate successful reinstatement; and how the drainage design will prevent increased or concentrated runoff, sediment mobilisation and pollution from reaching nearby watercourses and the River Tas catchment.

These matters should be resolved through evidence and enforceable requirements before reliance is placed on the assumption that existing permeability and runoff behaviour will be maintained. Deferring important investigations and drainage details until after consent risks leaving the effects on our property and the local water environment insufficiently assessed when the development is authorised.

3.4 Evidence required to demonstrate that flood risk has been properly assessed

We recognise that some detailed construction arrangements may legitimately be developed later. However, the flood-risk consequences themselves must be adequately assessed before consent, and any later design must be controlled by clear, enforceable requirements. Outline management plans alone do not establish that flood risk at our property has been properly assessed or can be acceptably controlled.

Any requirements should include measurable performance standards, monitoring, intervention thresholds and remedial measures. The Applicant should explain what happens if temporary drainage or pollution controls fail, runoff or ponding worsens, or unusually heavy rainfall occurs, and how post-construction checks will verify that reinstated ground has recovered its drainage function.

The site-specific evidence should address existing flooding, soil infiltration, the combined effects of arrays and construction infrastructure, and the potential for runoff to be concentrated or redirected towards [redacted], our paddocks, the house and garden, nearby watercourses and our private water supply.

Soil-compaction inspections and reinstatement procedures are not, by themselves, evidence that infiltration capacity and drainage function will be maintained. The Applicant must assess the consequences of any change in permeability or runoff for neighbouring land and properties.

The restrictions on compounds and stockpiles in mapped risk areas do not establish that runoff from other parts of Sites 8A and 8B cannot reach our property, particularly during intense rainfall or if temporary drainage becomes blocked or fails. The combined effects of arrays, soil compaction, internal haul roads, cable works and drainage infrastructure therefore need to be assessed quantitatively.

3.5 Outstanding drainage arrangements and the risk to our property

The Applicant's Outline Construction Environmental Management Plan (APP/7.1, Revision 2, section 3.5, pages 22–23) says that temporary drainage arrangements, water-quality monitoring and a detailed surface-water drainage strategy will be developed before construction, with further details in the detailed Construction Environmental Management Plan and Water Management Plan. This confirms that important implementation details remain outstanding. That may be appropriate for construction planning, but it does not replace the need for the flood-risk effects at Sites 8A and 8B to be assessed before consent, or for the eventual measures to be secured by enforceable requirements.

Because our land already experiences extensive flooding while the house and garden remain above the affected areas, the Examining Authority should be satisfied that the proposed development can be drained safely in these specific ground conditions—not merely that a drainage plan will be produced later.

3.6 What the Applicant's soil-management plan acknowledges

The plan also makes clear that important details remain for the contractor's detailed Soil Management Plan. The detailed procedures for assessing soil moisture and deciding when to stop or restart soil handling are to be set out later (paragraphs 4.2.9–4.2.14). The proposed rainfall guidance says soil handling should cease after 15 minutes of light rain and immediately during heavy rain or intense showers. These are useful precautions, but they do not themselves demonstrate that the flood consequences of any change in soil permeability have been assessed for Market Lane Farm.

The same plan identifies clay or clay-loam topsoils and subsoils as predominant across Sites 5–9, including Site 8 (paragraph 2.3.8 and Figure 2.4, page 8). It records 115–124 field-capacity days per year across the scheme (paragraph 2.2.2). These matters are relevant because our land already experiences extensive flooding during heavy rainfall. They make it important to establish whether construction and trafficking could reduce infiltration, change existing flow paths or redirect runoff towards areas of our property that currently remain unaffected.

The Applicant's Outline Soil Resource and Management Plan (APP/7.9) acknowledges that vehicle and plant movements, and the handling of soils in inappropriate wet conditions, can damage soil structure. Paragraphs 2.4.2–2.4.4 explain that wet soils are more susceptible to compression and smearing and that handling soils when wet adversely affects soil-profile permeability. Paragraph 4.2.2 identifies compaction and smearing of clay soils as potential consequences of construction activity, noting that such damage can be difficult to remedy.

4. Market Lane and construction traffic

There are very few passing places along [redacted]. For much of its length, high banks and hedges form the sides of the lane, leaving no usable verge or safe refuge for pedestrians, cyclists, dog walkers or horse riders to step off the carriageway when a vehicle approaches. The lane also has several blind bends. When two vehicles meet where there is insufficient room to pass, drivers often have to reverse around these bends to reach a passing place. This is already a difficult and potentially hazardous situation for ordinary road users; introducing frequent construction traffic, including large HGVs, would increase the likelihood of conflict, obstruction and

unsafe reversing. It would also put vulnerable users at particular risk because they have nowhere safe to move aside. These physical constraints need to be assessed as they exist on the ground, not treated simply as a matter of managing traffic volumes.

The risks to horse riders on narrow rural roads are not merely theoretical. In her own fundraising account for the British Horse Society's road-safety work, [redacted] states that on 2 April 2026 she was hit by a car while exercising her event horse, Killossery Kaptain ("Benny"), in a quiet village near her home, and that Benny was killed. Subsequent reporting by Horse & Hound describes the collision and confirms that Benny was so badly injured that he had to be put down at the roadside. The incident is now being used to raise awareness of the British Horse Society's Dead Slow campaign. We refer to this tragedy not to suggest that its precise circumstances were identical to those on [redacted] but to illustrate the potentially devastating consequences of collisions involving horses and vehicles on rural roads.

[redacted] has physical characteristics that make the introduction of substantial construction traffic a serious concern: blind bends, high banks and hedges, very few passing places and long stretches without a safe verge on which a horse and rider can move clear of a vehicle. Where there is insufficient space, a rider may have very limited opportunity to move aside or turn around safely, while a large HGV cannot pass a horse with adequate clearance. The risk is compounded by the need for drivers meeting on the lane to reverse around blind bends to reach a passing place. Repeated construction-vehicle movements would add to the risks in a road environment that already offers little margin for error. We therefore ask the Examining Authority to give proper weight to the safety of horse riders, pedestrians and cyclists, and to require a construction access arrangement that avoids [redacted] rather than relying on drivers and vulnerable road users to manage these inherent constraints.

[redacted] is narrow, constrained and vulnerable to flooding. It is not a suitable route for substantial construction traffic, particularly HGVs, passing vehicles and repeated movements associated with a major construction site. The potential effects include obstruction, damage to the lane and verges, danger to road users, noise and vibration, and additional difficulty during periods of flooding or poor weather.

The Applicant also refers to a temporary footpath within Site 8B. We do not consider this an adequate answer to the effects of a closure of [redacted]. A footpath contained within the site would not help residents, visitors or other users reach destinations beyond the site if the lane itself were closed; it could leave people able to walk only within the site, without a practical onward route. The proposed footpath therefore cannot be treated as a substitute for maintaining access along [redacted] or as mitigation for the consequences of closing it. The Applicant should explain how access to and from affected properties, and safe onward journeys for pedestrians and other road users, would be maintained during any closure, and identify a genuinely usable alternative route. This issue is particularly important for us and our neighbours because the lane is part of our everyday access, not simply a recreational route.

The Applicant also indicates that [redacted] may need to be temporarily closed. Even a temporary closure would have a direct and serious effect on our everyday lives and on our neighbours. This is not an incidental inconvenience: the lane forms part of the access arrangements for our homes and normal daily activities. A closure could disrupt journeys, access for visitors and services, and the ability of residents to come and go freely; the practical consequences would depend on the duration, timing, notice given and availability of a suitable alternative route. The Applicant should therefore explain precisely when and why a closure might occur, how long it could last, which properties and users would be affected, what access would be maintained for residents and emergency services, and what alternative arrangements would be provided. These impacts must be assessed and addressed in advance, rather than left to be resolved during construction.

In EXAM/9.21, the Applicant says that an internal haul route in Site 8A would reduce traffic on [redacted], but also acknowledges that vehicle movements between Sites 8A and 8B may still use the restricted section between Access 49 and Access 50. That is not a sufficiently clear commitment to protect us from construction traffic on the lane.

There is also a direct and particularly relevant statement from the project manager, [redacted]. When she stood with us on [redacted], she said: "we know that [redacted] is not suitable for works traffic". We ask

the Examining Authority to take this statement into account when considering the suitability of the proposed construction traffic arrangements and the adequacy of the Applicant's current commitments. It is directly relevant to our concern that the narrow, constrained and flood-prone lane should not be relied upon for construction traffic. We understand this to be a statement made during our discussion on site; if the Applicant disputes the wording or context, we ask that this is clarified during the examination.

The Norfolk County Council Statement of Common Ground (EXAM/9.4) records that the current transport strategy for Sites 7 to 10 does not adequately address significant highway constraints or provide sufficient mitigation, and that the strategy cannot currently be supported. This is particularly important given the physical limitations of [redacted] and our concerns about its use.

We ask the Applicant to adopt and assess the alternative access arrangement we have proposed: access from Brooke Road, with an internal connection or bridge between Sites 8A and 8B, so that construction traffic does not need to use [redacted] Lane. If that alternative is not pursued, there must be an explicit, enforceable prohibition on construction HGVs and other specified construction traffic using these lanes, with a credible alternative route and effective monitoring. A general aspiration to reduce movements is not enough.

5. Landscape, tranquillity, footpaths and wellbeing

The rural character of this area is part of what makes our home a place where we want to live. The proposed development would bring a large industrial-scale energy scheme close to our boundary, changing views, the experience of the surrounding countryside and the sense of tranquillity. The landscape evidence, including the work prepared by [redacted] for Site 8, and the District Council's examination material, supports the concern that adverse effects would remain even after mitigation.

Public rights of way are also part of the local environment and how people experience it. The Applicant's statement that routes will remain open wherever practicable, and that a permissive path is proposed through Site 8B, does not in itself answer concerns about the quality of the experience, construction disruption, safety, or whether access will be reliable throughout the relevant period. These matters need to be assessed in practical terms.

There are also unresolved ecology questions relevant to the sensitivity of this location. The detailed objection identifies a barbastelle bat maternity colony in woodland close to Site 8B, reported at approximately 70 metres, and frequent activity in the surrounding area. It also raises the absence of evidence establishing whether a maternity roost is present at [redacted] near the junction of [redacted]. We do not ask the Examining Authority to assume a roost is present where that has not been established; we ask whether the baseline is sufficient and whether the Applicant has adequately assessed effects on the colony, commuting and foraging habitat before relying on mitigation.

The detailed Site 8 objection identifies Footpaths 18, 19 and 22 and the Boudicca Way as routes whose experience may be affected by enclosure, loss of openness, construction activity and changes to rural tranquillity. We ask that the effects on recreational users are considered cumulatively and sequentially, including whether routes remain practically usable and enjoyable during construction, rather than treating formal retention of a path as sufficient mitigation.

We note the Applicant's Mental Health and Wellbeing Addendum (EXAM/9.27), which responds to concerns about stress, anxiety, sleep disturbance, loss of tranquillity and attachment to home and place. We do not suggest that every individual effect can be quantified. However, our concerns are specific to our circumstances: we will be living immediately beside the development, with the prospect of construction activity and lasting change to our surroundings. A conclusion about effects at population level does not necessarily address the lived impact on a household in such close proximity.

5.1 Landscape and visual impact: our response to the evidence concerning Site 8

We wish to draw the Examining Authority's particular attention to the landscape and visual evidence prepared by [redacted] in her report, East Pye Solar – Site 8, Shotesham – Landscape and Visual Matters, and her

response to the Applicant's further response, EXAM/9.21. [redacted]'s annotated response is submitted separately, and we ask that it is read alongside this representation.

We consider [redacted]'s evidence particularly important because it examines the effects of Sites 8A and 8B in their immediate landscape context. This is not an abstract debate about the appearance of a solar farm somewhere in the countryside. It concerns the transformation of the landscape immediately around our home, where we have lived for 11 years and where we intend to remain.

We are concerned that the Applicant's response does not adequately address the landscape sensitivity of this location or the significance of the effects identified by [redacted]. The landscape around Shotesham is not simply a collection of agricultural fields. Its character comes from the undulating landform, the Tas Valley and its tributaries, woodland, the historic village, open views and the network of public rights of way. These features are interconnected and contribute to the rural character and experience of the area.

[redacted]'s assessment identifies the wider landscape as valued and highly sensitive. We recognise that the Applicant disputes aspects of her assessment, including the way landscape value and sensitivity have been judged. However, the absence of a national landscape designation does not mean that the landscape has little value or that significant harm can be disregarded. We ask the Examining Authority to consider the evidence and reasoning in both assessments, rather than treating the Applicant's conclusions as determinative.

We are particularly concerned by the differences in the assessment of effects on the Tas Rural River Valley and on people using public rights of way. [redacted] identifies significant adverse effects that are not adequately reflected in the Applicant's conclusions. Her response explains why views along a walking route cannot necessarily be represented by a single viewpoint. People experience the landscape as they move through it, with views opening up, changing and extending across the valley. This is an important part of the character of the area that we believe the assessment must properly recognise.

These concerns are directly relevant to our home. Site 8B lies immediately beyond [redacted], and our property is exceptionally close to the proposed development. We would experience the scheme not only from our home but also through the transformation of the surrounding landscape, the introduction of infrastructure into nearby fields and the associated loss of the existing rural setting.

We are also concerned about the reliance on planting as mitigation. Planting may eventually screen some views of the panels, but it cannot remove the effects of construction or immediately restore the existing landscape. It may also close down views that are currently open across the valley. We do not consider it sufficient simply to assume that planting will make the effects acceptable over time, particularly when significant residual effects remain in the assessments.

The proposed operational period of 60 years is also important. This is not a short-term change that will be experienced briefly and then disappear. It is a development that would affect the landscape and the people living in and using it over several decades. The fact that the development may eventually be decommissioned does not remove the significance of the effects during that period.

We are particularly troubled by the question of why Site 8 remains within the proposed development when the landscape sensitivity and significant adverse effects have been identified. We support renewable energy in principle, but we do not believe that this removes the need to choose appropriate locations and properly examine less harmful alternatives. We ask the Examining Authority to scrutinise the site-selection process and the reasons for retaining Sites 8a and 8b, in light of the evidence presented by [redacted].

We support [redacted]'s request for a site visit. We believe that seeing the landform, the relationship between the proposed development and Shotesham, and the views from the affected public rights of way would help the Examining Authority understand the nature of the landscape and the scale of the proposed change.

We ask that [redacted]'s original report and her annotated response to EXAM/9.21 are given proper consideration alongside the Applicant's LVIA and other examination documents. In our view, her evidence reinforces our concern that the effects of Site 8 have been understated and that the proposed mitigation does not adequately address the harm that would result.

For us, the consequences are personal and enduring. This is the landscape around our home, not simply a development site on a plan. We ask the Examining Authority to consider the full weight of the landscape and visual evidence when deciding whether Sites 8a and 8b should remain part of the proposed scheme.

6. Why Site 8 should be reconsidered

The issues at Site 8 are connected and cumulative. The proximity of the panels and associated infrastructure to our home magnifies the significance of landscape change, construction noise and activity, traffic, drainage uncertainty, soil compaction and risks to our private water supply. These cannot sensibly be treated as separate, manageable impacts without considering their combined effect on the same household and property.

The detailed objection also raises matters that remain important to the overall assessment: noise and vibration in a quiet rural setting; potential glint and glare at [redacted]; and the effects on heritage setting and the local network of public rights of way. We ask that any later response said to resolve these matters identifies the specific evidence and receptor assessment relied upon. In particular, a general assessment of landscape or residential amenity should not be treated as a substitute for examining our home as a distinct, very close receptor.

The examination material identifies outstanding highway and water-environment matters. The Applicant's proposed mitigation does not remove the need to demonstrate that the location is suitable and that the impacts can be acceptably controlled. Given the small contribution Site 8 makes to the overall scheme, we ask the Examining Authority to consider whether its inclusion is justified when weighed against the concentrated and long-term effects on nearby residents.

The proportionality of retaining Site 8 is addressed in section 6.1. Here, we emphasise that the unresolved effects should be considered together, because they would be concentrated on the same household and property.

6.1 The proportionality of retaining Site 8

In paragraph 3.1.9 of EXAM/9.21, the Applicant argues that removing Site 8 would represent "more than a small loss in function" and that there are no exceptional circumstances to justify its removal. We question whether this position is proportionate to the contribution that Site 8 makes to the overall scheme.

Our calculations indicate that Site 8 represents less than 3% of the overall scheme area. This is a limited contribution when considered against the significant landscape, ecological, hydrological, transport and residential amenity concerns associated with Sites 8A and 8B.

We recognise that the proportion of land area does not, by itself, establish the precise loss of generating capacity. However, the Applicant's assertion that removing Site 8 would result in more than a small loss of function should be supported by clear evidence explaining the actual capacity that would be lost and why that loss would materially undermine the scheme. We ask the Examining Authority to scrutinise that assertion rather than assume that retaining Site 8 is necessary.

The issue is not whether renewable energy generation is important; we accept that it is. It is whether retaining this particular, highly constrained location is justified when its contribution appears limited and the adverse effects are substantial. We therefore ask the Examining Authority to consider whether the wider benefits of the scheme could be retained while avoiding the disproportionate harm associated with Sites 8a and 8b.

7. Conclusion and requests to the Examining Authority

For the reasons set out above, we ask the Examining Authority to:

- Give specific and appropriate weight to the proximity of our home to Sites 8A and 8B and to the combined effects on our household.

- Require a robust, site-specific assessment of flood risk, surface-water flow paths and drainage impacts, informed by the actual flooding we experience at [redacted] and addressing floodplain panels and temporary works, culvert performance and the maintenance of floodplain storage and conveyance;
- Require the Applicant to demonstrate, with site-specific evidence, how runoff and pollutants from Sites 8A and 8B would be prevented from reaching our home, soil and paddocks, the stream and our private drinking-water borehole, including during severe rainfall and in the event that mitigation measures fail.
- Require clear evidence and enforceable safeguards protecting our private drinking-water borehole, including an appropriate pre-construction baseline, in-situ and laboratory water-quality monitoring, clear trigger levels, reporting and notification arrangements, and a defined response including alternative supply and remediation if water quality or supply is affected;
- Require a safe and credible access strategy that avoids construction traffic using [redacted], with the Brooke Road alternative properly considered and assessed.
- Require site-specific evidence on soil compaction and infiltration, including the effects of construction traffic and the internal haul road, and enforceable standards for reinstatement and verification of soil structure and drainage function.
- Require the Applicant to demonstrate whether the combined effects of the arrays, compacted ground and haul-road drainage on runoff rates, volumes, flow velocities and downstream flood risk have been assessed for Sites 8A and 8B.
- Ensure that residual landscape, visual, noise, tranquillity, footpath and wellbeing effects are assessed together, including the particular circumstances of homes immediately adjacent to the site.
- Consider removing Site 8, or materially reducing its extent, if the Applicant cannot demonstrate that these impacts can be acceptably avoided or mitigated.

We cannot adequately express how deeply distressing it is to be facing a development of this scale, immediately beside our family home, while so many fundamental questions about its potential effects remain unanswered. We have lived here for 11 years, invested our lives in this property and have no intention of leaving. Yet we are being asked to accept uncertainty about whether our land will flood more severely, whether our private water supply will remain safe, whether construction traffic can safely use our narrow lane, and what the lasting effects on our home and its setting will be. These are not theoretical concerns or minor matters of construction detail; they affect the safety, security and enjoyment of the place where we live. If someone proposed building a house immediately beside ours, we would reasonably expect the relevant impacts to be properly assessed before planning permission was granted. It is extraordinarily difficult to understand why a nationally significant infrastructure project, with the potential to affect our lives on a far greater scale and for decades, should appear to be proceeding with so many important matters left to future investigation, detailed design or management plans. We recognise the national importance of renewable energy, but that cannot mean that the people living closest to a development should be expected to bear risks that have not yet been adequately understood. We are not asking for special treatment. We are asking for the same fundamental assurance that any family should be entitled to expect, that the consequences for our home have been properly investigated, that the proposed safeguards are demonstrably effective, and that these questions are answered before a decision is made that could permanently change our lives.

We ask that the decision on Site 8 reflects the reality that this is our home, not simply a point on a plan. The development would be immediately beside us, and the safeguards need to be robust enough to protect our home, land, water supply and quality of life.

Our house from the top of Site 8b. We believe this demonstrates not only the proximity (everything between the camera and our house is Site 8b), and also the extent of the elevation of Site 8b and how impactful it will be in terms of visibility, sound, water run-off and possible pollution.



Flooding on our paddocks. This is just one example of the flooding we experience. There are additional images and maps contained in the Shotesham Parish Council relevant representation, which is also attached to this submission. It feels like the majority of the content in the submission has not adequately been addressed.



References

1. East Pye Solar Limited, Applicant's Further Response to Shotesham Parish Council Relevant Representation, EXAM/9.21, particularly paragraph 3.1.9.
2. [redacted], Classic Landscape Architecture, East Pye Solar – Site 8, Shotesham – DCO Examination – Written Representation – Landscape and Visual Matters, June 2026.
3. [redacted], annotated response to the Applicant's Further Response to Shotesham Parish Council Relevant Representation, EXAM/9.21, submitted separately.
4. Environment Agency and East Pye Solar Limited, Statement of Common Ground: Environment Agency, Revision 1, October 2026, Planning Inspectorate reference EN0110014, document EXAM/9.6, especially items EA WE–12 (page 19) and EA WE–13 (page 20).
5. Welsh Government (2023), The impact of solar photovoltaic (PV) sites on agricultural soils and land quality: Work Package Three — Review of Impacts, section 2.4.4 and Figure 6, p. 11. Available at: https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-3.pdf
6. [redacted]. Personal fundraising account for the British Horse Society's road-safety work, describing the collision on 2 April 2026 and the death of Killossery Kaptain ("Benny"). https://www.justgiving.com/page/tinks-walker-1
7. [redacted]. "Rider who lost dream horse in road crash rides in his memory", Horse & Hound, October 2026. Reporting on the collision and the British Horse Society's Dead Slow campaign. https://www.horseandhound.co.uk/equine/tinks-walker-charity-race-bhs

Note on the horse-road safety example: The account is used to illustrate the potential severity of horse–vehicle collisions, not as evidence that the circumstances of that incident are the same as those on [redacted]. The personal account is used for the stated date; the Horse & Hound report describes the accident as having occurred in May, so this representation does not rely on that report for the exact date. Legal proceedings relating to the incident have been reported.