EAST PYE SOLAR

Shotesham Parish Council
Deadline 2 Written Representation

Planning Inspectorate reference: EN0110014 | Deadline: Tuesday 27 October 2026

Response to the Applicant's later submissions and examination evidence

1. Purpose of this submission

Shotesham Parish Council submits this concise Deadline 2 representation as a follow-up to its earlier detailed objection, "Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b)". It does not seek to repeat that evidence. It draws attention to issues which remain important in light of the Applicant's later submissions, the Examining Authority's first written questions and the Statements of Common Ground, particularly in relation to Sites 8A and 8B, Market Lane and the River Tas catchment.

The Parish Council recognises the importance of renewable energy. Its concern is whether this location and the proposed mitigation have been shown to be acceptable, given the combination of flood risk, water environment, highway constraints, landscape effects and impacts on residents and public rights of way.

2. Landscape Impact and Significance of Conservation Area

East Pye Solar has submitted "Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A " (EXAM/9.21) which addresses matters raised in the Parish Council's relevant representation and in particular the technical report prepared by [redacted] "East Pye Solar—Site 8, Shotesham – DCO Examination – Written Representation – Landscape and Visual Matters", (CLA/330/26/01—F67335CB20). [redacted] has reviewed the Applicant's new submission and has provided her comments in the form of a mark-up of the report, which forms Appendix 1 to this submission.

The Parish Council welcome the acknowledgement that Sites 8A and 8B are part of a sensitive landscape and that the Scheme will cause significant harms to this landscape. The Applicant acknowledges that the LVM produced by [redacted] provides a detailed review of the area, is often more granular than the Applicant's own submissions and that it raises a number of legitimate matters relating to the scheme.

The applicant has attempted to make a number of professional criticisms of the LVM report, but these are well addressed by [redacted] response in Appendix 1.

We note that the Applicant has failed to reach a statement of common ground with South Norfolk Council on many areas of landscape assessment. Addressed in "Statement of Common Ground: South Norfolk District Council Revision 1" (EN0110014/EXAM 9.5). Furthermore, the apparent agreement that "SNDC considers that the Landscape Susceptibility SPD in relation to Energy Generation, Storage, and Transmission, adopted February 2026, is not relevant to the proposed development" is incorrect and based solely on a typographical error (as confirmed by [redacted]). This SPD remains highly relevant and suggests strongly that solar generation in this precious landscape is inappropriate.

The Applicant proposes a new permissive path through Site 8B as if this were some form of mitigation (para 3.1.2). The path will provide straight ahead views in both directions towards fenced solar fields and will have a materially more enclosed feel than existing paths in the vicinity. As such it is no more than a very modest addition to the network of local paths and provides no mitigation for the impact of the scheme. Furthermore, local residents would have no legal right to use a permissive path for the duration of the scheme.

In summary, we see no reason to alter our view that the solar farm proposal would be highly detrimental to this valuable landscape.

3. Flood risk, drainage and the River Tas catchment

The Parish Council remains concerned that the assessment does not yet demonstrate, with sufficient site-specific evidence, that construction and operation at Sites 8A and 8B would maintain existing drainage patterns and avoid increasing flood risk downstream. The land is connected to the River Tas catchment, and local evidence records existing flooding, flow paths across land around Market Lane Farm, and culverts and access routes affected during heavy rainfall.

The Parish Council's detailed Site 8 submission sets out the local evidence in Chapter 6, including sections 6.3–6.6 and the associated photographs and figures. Create Consulting Engineers' report (GB/VL/P25-3596/01, 9 October 2025, revised 21 October 2025) separately identifies that both study areas drain towards the River Tas and raises concerns about the adequacy of the submitted drainage assessment. These materials should be read alongside the Applicant's Flood Risk Assessment and outline drainage strategy.

The Environment Agency's Statement of Common Ground (EXAM/9.6, Revision 1, October 2026) records outstanding questions about panels proposed in the floodplain at the north-west of Site 8A, temporary works within the floodplain and the treatment of culverts. These are not merely detailed-design matters: they concern floodplain storage and conveyance, the routes by which water moves across the site, and whether those routes will remain effective during construction as well as operation.

The Applicant's drainage assumptions also need to be considered alongside soil conditions and construction activity. The application documents recognise that handling wet soils and vehicle movements can damage soil structure. Temporary haul roads, compaction, cable works and reinstatement may affect infiltration and runoff beyond the footprint of any individual track. The Parish Council asks for evidence that the combined effects of the arrays, construction compaction, haul roads and drainage infrastructure have been assessed for Sites 8A and 8B, rather than relying on general assumptions or leaving essential matters entirely to post-consent plans.

4. Groundwater and private water supplies

The Environment Agency's EXAM/9.6 statement identifies material deficiencies in the original Environmental Statement Chapter 9, Water Environment (APP/6.1.9, Revision 1, March 2026). Item EA WE–12 (page 19) records that the residual-effects assessment considered water-supply quantity but omitted potential water-quality risks from spills, leaks and other pollutant releases affecting public and private abstractions. Item EA WE–13 (page 20) identifies errors in the description of Source Protection Zones and concerns about the sensitivity assigned to private groundwater abstractions. The Applicant acknowledged these issues and indicated that corrections would be made; both matters were recorded as "Under Discussion" in the October statement.

The Parish Council has not verified a later revised Chapter 9 demonstrating that these corrections were made. This is not proof that no later submission exists. However, the Examination should identify and review any revised assessment before treating the acknowledged omissions and errors as resolved. Until that is demonstrated, the original conclusion that residual effects on water supplies would not be significant should not be treated as a complete assessment of the risks.

This is particularly relevant to the private drinking-water borehole reported to be approximately 38 metres from Site 8B. The Parish Council asks that the Applicant accurately identifies potentially affected private supplies, assesses their vulnerability and credible pollution pathways, and provides clear, enforceable safeguards. These should include appropriate pre-construction baseline testing; defined in-situ and laboratory monitoring; specified parameters, locations, frequency and reporting; trigger levels and stop-

work procedures; prompt notification; and a clear response, including alternative drinking water and remediation, if a supply is affected. Monitoring must complement—not replace—proper assessment and preventative measures.

5. Market Lane and construction traffic

The Parish Council remains concerned that Market Lane is unsuitable for construction traffic of the scale associated with this project. It is a narrow rural route with restricted visibility, limited passing opportunities, constrained edges and drainage and flooding issues. These limitations create risks for residents and for people walking, cycling or riding horses, and could affect access if the lane is closed or obstructed.

The Applicant's response to the Parish Council (EXAM/9.21) and Norfolk County Council's Statement of Common Ground (EXAM/9.4) do not remove the concern. EXAM/9.4 records that the current transport strategy for Sites 7–10 cannot currently be supported because significant highway constraints and insufficient mitigation remain. The Applicant's documents also continue to contemplate site-to-site movements affecting the restricted stretch of Market Lane.

The Parish Council asks the Applicant to properly assess and secure the less harmful alternative proposed in its detailed objection: access from Brooke Road (A51), with an internal connection or bridge between Sites 8A and 8B, avoiding the need for construction traffic to use Market Lane and Baxter's Lane. If that alternative is not adopted, the DCO should contain clear and enforceable restrictions on construction HGVs and other unsuitable project traffic using these lanes, together with a credible alternative route and effective compliance monitoring. A general commitment to minimise traffic is not sufficient.

6. Landscape, public rights of way and local amenity

The Parish Council's earlier detailed submission explains why Sites 8A and 8B are sensitive in landscape and amenity terms. The Applicant's and South Norfolk District Council's examination material recognises that significant adverse landscape and visual effects would remain during construction and early operation, with planting taking time to establish. Planting cannot remove construction effects or immediately restore openness and rural character.

The Parish Council asks the Examining Authority to consider the experience of users of Footpaths 18, 19 and 22 and the Boudicca Way, including cumulative and sequential effects along routes, construction disruption and the quality of the experience—not simply whether a route is technically retained. A proposed permissive path through Site 8B does not by itself resolve concerns about safety, reliability, tranquillity or access during any closure of Market Lane.

The Parish Council also asks that the Applicant's Mental Health and Wellbeing Addendum (EXAM/9.27) is considered alongside the practical circumstances of people living close to the development. Population-level conclusions should not obscure the concentrated effects on individual homes and the surrounding rural environment.

7. Site-specific and cumulative effects

The concerns at Site 8 are interrelated. Drainage and soil compaction, construction traffic, landscape change, noise and vibration, effects on public rights of way and risks to private water supplies cannot be considered in isolation where the same residents, land and watercourses may experience several effects together. The Parish Council's detailed submission identifies these interactions and should be read as the principal source of its site-specific evidence.

The detailed submission estimates that Land Parcel 8 contributes less than 3% of the overall development when the solar arrays, battery energy storage and cable corridors are considered together. That figure does not determine the planning balance on its own, but it is relevant when weighed against the

concentration of local impacts and the unresolved questions set out above. The Applicant should explain why Site 8 must remain in the scheme if it cannot demonstrate that these impacts can be acceptably avoided or mitigated.

8. Site selection

The Parish Council continues to have concerns that the Applicant has failed to undertake a credible site selection exercise and that sites 8A and 8B are only included in the site due to flaws in the original site selection conducted when the point of connection was understood to be Dunston. We note that the Applicant has failed to respond to Q1.3.1 of the Examining Authorities First Written Questions [PD-006] requesting evidence that a site selection exercise would not have resulted in a materially different scheme.

The Parish Council continues to believe that the identification of Sites 8A and 8B through the original site exercise is itself evidence of a flawed process, given that the process failed to identify the constraints on the site in terms of flood risk and topography. The result is a site that makes only a minimal contribution to the scheme's solar generation but leads to material harms.

The Parish Council considers that there are many strong planning reasons for the exclusion of sites 8A and 8B from the scheme. The failure of the applicant to apply a consistent approach and methodology to the identification of alternative sites using Great Moulton as the point of contact, and to evidence that a consistent approach would not have led to a materially different scheme, adds further weight to the exclusion of Site 8A and 8B from the scheme.

9. Requests to the Examining Authority

The Parish Council respectfully asks the Examining Authority to:

- Require the Applicant to identify the updated material, if any, that addresses EA WE–12 and EA WE–13, and verify that the water-quality omission and Source Protection Zone/private-supply errors have been corrected before relying on the assessment conclusions.
- Require a site-specific demonstration that floodplain storage and conveyance, existing flow paths, culvert performance and downstream drainage will be maintained during construction and operation at Sites 8A and 8B.
- Require an enforceable groundwater and private-water-supply protection and monitoring regime, including baseline testing, defined monitoring and trigger levels, reporting, notification, alternative supply and remediation arrangements.
- Require the Brooke Road (A51) access alternative and internal connection between Sites 8A and 8B to be properly assessed, with enforceable restrictions preventing unsuitable construction traffic from using Market Lane and Baxter's Lane.
- Assess the combined effects on landscape, public rights of way, tranquillity, noise and local amenity, including effects during construction and before mitigation planting matures.
- Reconsider the inclusion or extent of Site 8 if the Applicant cannot demonstrate, with evidence and enforceable controls, that these impacts can be acceptably avoided or mitigated.

Documents particularly relevant to this response

- Shotesham Parish Council, "Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b)", Full Detailed Submission Version, especially Chapters 6, 11 and 12.
- Environment Agency Statement of Common Ground, EXAM/9.6, Revision 1, October 2026, especially EA WE–12 (p. 19) and EA WE–13 (p. 20).
- Norfolk County Council Statement of Common Ground, EXAM/9.4.
- Applicant's response to Shotesham Parish Council, EXAM/9.21.

- Applicant's Environmental Statement Volume 1, Chapter 9: Water Environment, APP/6.1.9, Revision 1, March 2026.
- Applicant's Flood Risk Assessment and Outline Surface Water Drainage Strategy, APP/6.3.9.1, Revision 2.
- Applicant's Outline Construction Traffic Management Plan, APP/7.6, Revision 2; Outline Construction Environmental Management Plan, APP/7.1, Revision 2; and Outline Soil Resource and Management Plan, APP/7.9.
- Create Consulting Engineers Ltd, "East Pye Solar Farm – Land South of Shotesham All Saints – Flooding Issues and Drainage Assessment", GB/VL/P25-3596/01, 9 October 2025, revised 21 October 2025.
- [redacted] CMLI, "East Pye Solar—Site 8, Shotesham – DCO Examination – Written Representation – Landscape and Visual Matters", June 2026, CLA/330/26/01—F67335CB2.
- Applicant's Mental Health and Wellbeing Addendum, EXAM/9.27.

This representation is intended to be read alongside, and not as a replacement for, the Parish Council's earlier detailed Site 8 submission.