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31 July 2025

Formal Objection to East Pye Solar NSIP (PINS Ref: EN0110014)

Dear Sir/Madam,

I wish to preface this formal objection to the PEIR by explaining that Saxlingham Nethergate Parish Council object fundamentally to the East Pye Solar NSIP because there are already adequate solar energy and BESS projects either built, under construction or in planning to meet DESNZ's CP2030 and CP2035 targets for East Anglia (OFGEM TM04+ Impact Assessment, April 2025; NESO Connections Reform Data Impact Assessment, December 2024). As such, the East Pye Solar project is not essential to fulfil national renewable energy objectives. Indeed, it would unnecessarily take up capacity on the transmission grid which will be required for other types of generation needed in our area.

The extreme and wide-ranging harms posed by this scheme – to the landscape, community, wildlife, farmland, and nationally significant heritage – are not justified by any demonstrable critical need for it. This proposal represents an unjustifiable assault on rural Norfolk that fails to balance national policy with local environmental protection.

This submission constitutes a formal objection to the East Pye Solar Nationally Significant Infrastructure Project (NSIP) at the statutory consultation stage. Based on a comprehensive review, copy attached, of the Preliminary Environmental Information Report (PEIR) and its associated volumes, we conclude that the PEIR is legally and procedurally deficient and does not enable meaningful consultation as required by the Planning Act 2008 and the Environmental Impact Assessment Regulations 2017.

Key Legal and Planning Objections

1. The PEIR fails to provide adequate environmental information as required by Schedule 4 of the EIA Regulations 2017 and PINS Scoping Opinion 3.3.1. Key surveys (e.g. for great crested newts, turtle doves, lapwing, bats) are incomplete, with critical data deferred or missing. Surveys have not adhered to Natural England Guidelines or been undertaken at the advised times of year (GCN).
2. There is no lawful cumulative impact assessment in breach of NPS EN-1 §4.2.5 and EIA Regs Schedule 4(5) (PINS Scoping Opinion 3.19.4, 3.21.2, 3.21.3). The PEIR fails to consider adjacent or overlapping NSIPs such as Tasway Energy Park, EcoPower Yaxley, The Drovers or High Grove Solar.
3. The PEIR does not assess impacts on chalk streams, private drinking water supplies, or Source Protection Zones. No strategy for construction or operational water access has been presented, despite Anglia Water refusing supply (PINS SO 3.2.2). Specific Water Framework Directive screening is absent (PINS SO 3.2.4). No Flood Risk Assessment analysis has been provided (PINS SO 3.2.3)
4. EMF impacts on River Tas fish and local bat roosts have not been assessed (PINS SO 3.4.1 and 3.15.17).
5. The assessment of major accidents and disasters, especially the risk of BESS fires, is based on flawed or outdated statistics. There is no modelling of toxic plume, water contamination, or health impacts (PINS SO 3.11.1).

No probabilistic risk modelling or thermal runaway containment strategy is provided, despite the proximity of sensitive receptors including private water supplies and homes. This undermines compliance with EN-1 §4.11, EIA Regs Schedule 4(8) and BS EN 62446-1.

6. The PEIR fails to protect nationally important listed buildings and heritage assets, especially timber-framed buildings without foundations, and neither respects nor preserves the South Norfolk Claylands landscape. Night-time

lighting impacts on dark-landscapes are omitted (PINS SO 3.14.6). The Visual Impact Assessment does not use photography from summer or address private views or tranquil areas (PINS SO 3.4.2). Heritage settings are not assessed in tandem with visual effects, or cumulative landscape changes (PINS SO 3.5.3). Impacts to settings of Grade II Listed Buildings are still only assessed within 100m despite 2KM visibility of the panels (PINS SO 3.16.6).

7. There is no lawful assessment of impacts on public rights of way, or the consequences of compulsorily widening rural lanes. The impacts on walkers, riders, children, and the disabled are unaddressed (PINS SO 3.6). Norfolk County Council's PRow Policy and Guidance and Access Improvement Plan, BS5709:2018 or the Street Works Code are not referenced. Inclusive design must be addressed at the PEIR stage under the Equality Act 2010, yet it is entirely absent, as is any reference to NCC's Highways Development Management Guidance Note 2, Drainage Design Standard, Manual for Streets or Design Manual for Roads and Bridges.
8. There is no vibration modelling or impact assessment on historic structures, rural infrastructure, or adjacent properties, despite proposed use of HGVs on single-track lanes. There is no specific assessment of BESS noise, nor any receptor-level analysis (PINS SO 3.18.3).
9. Key infrastructure is sited near high-pressure gas mains, private water supplies and close to the London to Norwich mainline railway, none of which are properly assessed in the PEIR. UXO Desk Study identifies moderate-high risk but PEIR gives no survey timetable (PINS SO 3.3.2).
10. There is no air quality modelling for construction traffic or cumulative effects (PINS SO 3.1.3), and vulnerable receptors are ignored, contrary to EN-1 §5.11 and IAQM guidance.
11. Long-term harm to soils and agricultural productivity is not properly addressed (PINS SO 3.20.3). No mitigation nor restoration plan is in place for best and most versatile land.
12. The statutory consultation is procedurally flawed. The Non-Technical Summary is misleading, and the consultation does not comply with s47 of the Planning Act or Regulation 12 of the EIA Regulations.

The Planning Inspectorate explicitly stated at the EIA scoping stage (January 2025) that most of these issues should be scoped back in. The Planning Inspectorate's Scoping Opinion specifically required assessment of cumulative solar projects, clarity on BESS fire risk, hydrological impacts on the River Tas, and heritage setting effects. These were either omitted or insufficiently addressed in the PEIR.

No probabilistic risk modelling or thermal runaway containment strategy is provided, despite the proximity of sensitive receptors including private water supplies and homes. Omitting the presence of the high-pressure gas main from assessment in the PEIR is a particularly grave failure. This undermines compliance with EN-1 §4.11 and EIA Regs Schedule 4(8).

Complaint about Community Engagement

We would also like to bring to the Planning Inspectorate's attention that many residents across multiple parishes, including elderly and vulnerable parishioners, have been receiving letters from East Pye Solar's land agent, Dalcour Maclaren, informing them that their property 'may be required' for this project.

The letters provide no indication of exactly why their property may be needed or whether this is on a temporary or permanent basis. This is causing enormous distress and anxiety to residents and has been reported extensively in national and local press ('Domesday villagers face being forced to sell homes to make way for UK's biggest solar farm', *Daily Express*, Mon, Jun 9, 2025; 'Britain's biggest solar farm threatens Domesday villages', *Telegraph* Mon, Jun 9, 2025). Despite this, neither East Pye Solar nor Dalcour Maclaren have provided any reassurance to individual residents.

The residents have been contacted multiple times by post and by telephone. The situation has become so distressing that Hempnall Parish Council has passed a motion to report the issue to the Police as causing Harassment, Anxiety and Distress.

We hope you agree that this project should be planned from the start to avoid these kinds of impacts on private residential properties. This is an entirely inappropriate way to treat the local community and their private property rights, which are protected under Article 1 of Protocol 1 of the Human Rights Act 1998, standards set out in Section 122 of the Planning Act 2008, Section 47 of the Planning Act and EIA Regulation 12(3)(b).

Specific Objections of Saxlingham Nethergate Parish Council

In addition to the fundamental objections set out above, the Parish Council has detailed objections to the impact of the scheme on the Saxlingham Green Conservation Area, some listed buildings, the public rights of way that will be affected by the scheme and on the potential for the scheme to increase flooding of The Street and houses fronting it. There are also specific objections with regard to a proposed construction compound on Broaden Lane and the substation in the corner of field 7. We deal with each point in turn in the following paragraphs.

Impact on Saxlingham Green Conservation Area

The Conservation Area sits within a typically attractive Norfolk arable landscape. The proposed panels in sites 7c, 7e and 7g will radically and adversely change the landscape setting of the Conservation Area when viewed from the south, demonstrating that the applicants have not paid any regard to the statutory duty imposed by section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 that "...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area..." We object to the detrimental impact of the scheme on the setting of the conservation area.

Impact on listed buildings

The scheme may impact on the settings on listed buildings in or close to the Saxlingham Green Conservation Area but the full potential impact cannot be determined from the limited detail submitted with the scheme. The buildings whose settings might be particularly affected are listed grade 11 and are on The Green, Manor Farm Cottage, Manor Farmhouse and Manor Farm Barn, demonstrating that the applicants have not paid any regard to the statutory duty imposed by section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990 that "...special attention shall be paid to the desirability of preserving the building or its setting ...". We object to the detrimental impact of the scheme on the settings of these listed buildings.

Public Rights of Way (PRoW)

There are no detailed plans showing how the PRoWs are to be accommodated within the scheme. It is already clear that footpaths FP5, FP12, FP13, FP27 will be very seriously and adversely affected by the proposals. Pleasant walks through an arable and treed landscape will be replaced by "walks in cuttings" between rows of 4.5m high panels that will industrialize the landscape. We object to the detrimental impact of the scheme on the PRoWs listed above.

Flooding

The Parish Council and the residents on The Street are deeply concerned that the scheme will lead to increased flooding of The Street during periods of high rainfall, which are becoming more frequent with climate change. The last flooding of The Street, to a depth of some 15cm, occurred in December 2020 when two houses were also flooded. The Street is at the bottom of a catchment of some 7.25 sq km that includes the scheme site 7 to the south of Saxlingham Green. Any increased run off from these areas will exacerbate the flooding of The Street in times of heavy rain. In the absence of a properly worked flood risk assessment the Parish Council objects to the scheme as being likely to increase food risk.

The construction compound on Broaden Lane

The scheme proposes a construction compound on Broaden Lane adjacent to FP 12 on the main approach to the village from the south. This compound will have a negative effect on the appearance of the village when approached from the south and its traffic implications for the narrow lanes in the village have not been modelled.

The substation in the corner of field 7

The scheme proposes a substation in the corner of field 7F. This substation will be 43m x 65m x 6.5m high and will be prominent and have a negative effect on the appearance on the southern approach to the village.

Conclusion

For the reasons set out above, we respectfully request that:

- The consultation be deemed procedurally invalid;
- A revised and legally compliant PEIR be issued, including complete data and proper assessments;
- A fresh consultation period be initiated in accordance with statutory requirements and best practice.

Yours faithfully,



Julie King
Parish Clerk