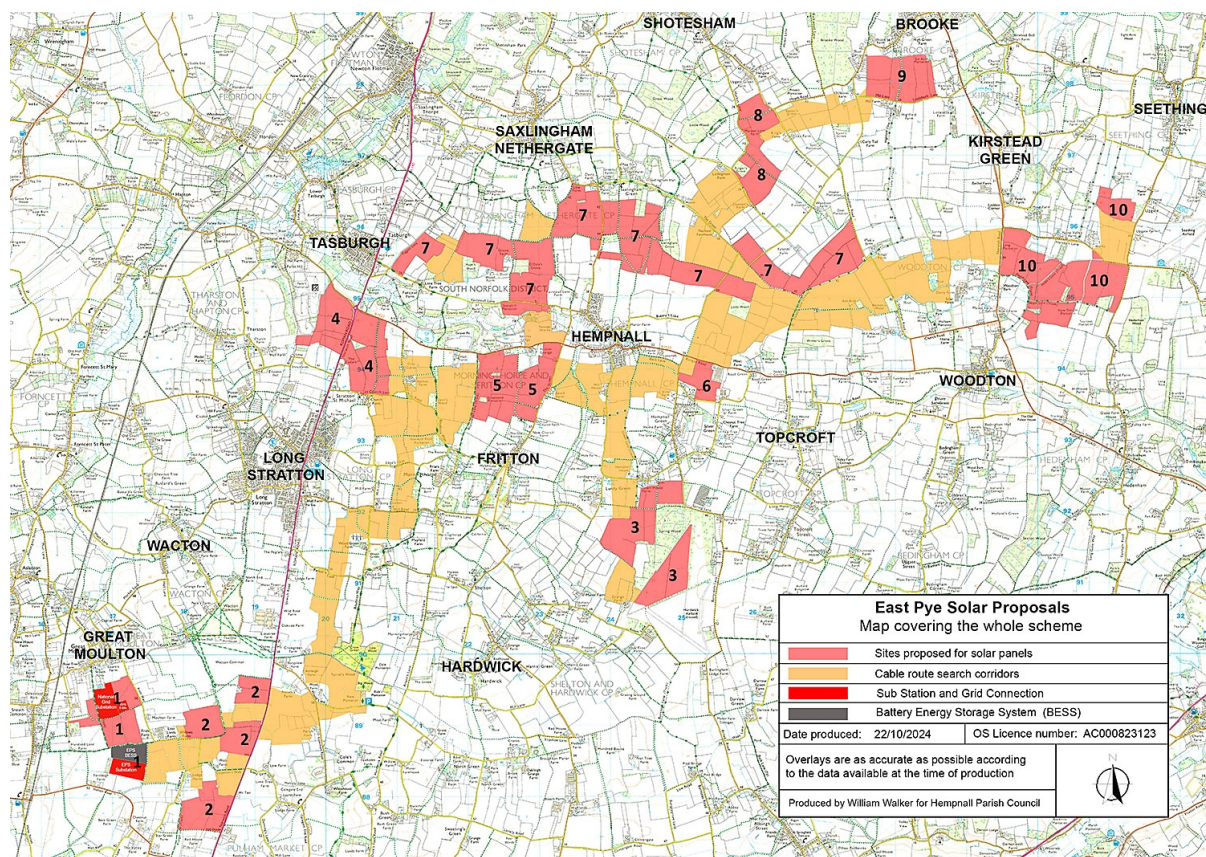


BEPS: MAIN REASONS TO OBJECT TO EAST PYE SOLAR

Site-by-site Guide



Sites 1& 2 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this site in this specific location is necessary.
- The applicant’s own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- The BESS only has Gate 1 status, not a secured future connection, making the total project as submitted potentially undeliverable.
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Major Infrastructure Hub on Great Moulton Plateau

- Infrastructure should be sited in a landscape which minimizes impacts.
- The applicant admits that this location has been selected solely on the basis of commercial land agreements, and lack of connection capacity at Norwich Main, not environmental suitability.
- **This infrastructure hub would be permanent, as would all harms.**

3. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelles recorded across the entire scheme area.
- Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.

4. Ecology - Extremely rare assemblages of botany

- This is a nationally important landscape for rare botany, especially Hundred Way, Prangle Lane and Lodge Road.
- East Pye Solar has not done any appropriate botanical survey, despite proposing to use these routes for site traffic.

5. Water environment

- The site sits in a highly sensitive chalk-stream and chalk-aquifer catchment (Waveney), with multiple private water supplies, private sewerage and vulnerable water receptors within 250m.
- There are unresolved risks from pollution, groundwater effects, surface water runoff and trenching.
- This project poses a significant risk to public health and ecology. Insufficient hydrological or hydrogeological modelling has been done to ascertain true impacts.

6. Tibenham Airfield

- The infrastructure hub at site 1 and the surrounding solar fields pose an existential threat to Tibenham Airfield and Norfolk Gliding Club.
- The airfield's concerns have not been properly recognized; no on-site surveys or modelling have been done.

7. Fire Risk and contamination risk

- Norfolk Fire Service has stated that the proposed site of the National Grid substation poses a fire risk to the village of Great Moulton

8. Heritage and landscape

- South Norfolk is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in this project's zone of influence.
- The settings of several Grade II Listed Buildings would be significantly impacted by infrastructure on this site.
- This scheme would industrialise a rural historic landscape of high sensitivity.
- These are location-based harms which arise because this is the wrong place for a scheme of this scale.

9. Cumulative Impact

- The National Grid substation proposed for this scheme would allow multiple other solar and BESS projects to connect.
- Tasway Energy Park has Gate 1 and is paused while waiting for this potential grid connection.
- East Pye Solar has not given a true assessment or accurate spatial mapping of the extent of the cumulative harm that a new National Grid substation would enable at this location.

10. Too much left to later approvals

- The draft DCO relies too heavily on later plans, later approvals and later mitigation.
- There is no confirmation or agreed design by National Grid for a substation on this location.
- This creates uncertainty about whether the scheme is genuinely deliverable without unacceptable harm.

11. There is no benefit to our communities in hosting this scheme, only harm.

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Site 3 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant's own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- General claims about 'optionality' and 'attrition' do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area. New evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Spring Wood, which adjoins site 3, hosts barbastelles and has been developed specifically as a bat habitat, with former WWII bomb shelters converted by the Norfolk Bat Group to bat hibernacula which now sustain significant populations.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The proposed tilting panels will be horizontal at night – research shows that bats confuse solar fields for water bodies which has an impact on their ability to hunt. Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Water environment

- The site sits in a highly sensitive chalk-stream and chalk-aquifer catchment (Tas), with multiple private water supplies, private sewerage and vulnerable water receptors surrounding the scheme.
- Private Water Supplies have not been assessed according to connectivity, only proximity. Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to

ascertain true impacts.

4. WWII USAAF/RAF Hardwick, Ground Contamination and Unexploded Ordnance

- The site sits on a former WWII airforce base, specifically on the site of the former heavy bomb dump.
- There is a high likelihood of unexploded ordnance, yet ground surveys have not been undertaken.
- There is a high likelihood that this land is contaminated from WWII firefighting foams and other pollutants yet there has been no risk assessment of the spread of contamination.
- There is no modelling regarding impacts of the proposed infrastructure to the two local active airstrips at Hardwick and Airfield Farm.

5. Too much left to later approvals

- The draft DCO relies heavily on later plans, later surveys, later approvals and later mitigation to make the project look acceptable.
- Important environmental problems should be resolved before consent, not postponed to post-consent documents.

7. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: "I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location."

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Site 4 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant's own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- The BESS case is uncertain because it only has Gate 1 status, not a secured future connection.
- General claims about 'optionality' and 'attrition' do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area.
- This New evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The proposed tilting panels will be horizontal at night – research shows that bats confuse solar fields for water bodies which has an impact on their ability to hunt.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Ecology – White Clawed Crayfish

- Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish within 2KM of site 4a.
- East Pye Solar has erroneously stated that the Tas Chalk Stream is unlikely to support White Clawed Crayfish.
- East Pye Solar's aquatic surveys were carried out when streams and ditches were dry, which is unacceptable.

4. Water environment

- The site sits in a highly sensitive chalk-stream (Tas) and chalk-aquifer catchment, with a high degree of hydrological connectivity, multiple private water supplies, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

5. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.
- The settings of Grade I Stratton St Michael's Church and Grade II* The Old Rectory, and barn, as well as numerous

- Grade II Listed Buildings would be significantly impacted by infrastructure on this site.
- This scheme would industrialise a rural historic landscape of high sensitivity.
- These are location-based harms which arise because this is the wrong place for a scheme of this scale.

6. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 5 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary. Prioritised schemes already meet regional solar capacity ranges.
- This is the wrong location for a 400KV substation and associated solar infrastructure
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area.
- Multiple maternity colony core sustenance zones overlap the entire site and cable corridor. Site 5 is at the epicentre of the core sustenance zones.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Ecology – White Clawed Crayfish

- Norfolk Rivers Trust have survey results recording a breeding colony of White Clawed Crayfish in the Tas.
- East Pye Solar has erroneously stated that the Tas Chalk Stream is unlikely to support White Clawed Crayfish.
- East Pye Solar’s aquatic surveys were carried out when streams and ditches were dry, which is unacceptable given that this is a Chalk Stream Catchment known to be a habitat of White Clawed Crayfish.

4. Water environment

- Site 5 sits in a highly sensitive chalk-stream (Tas) and chalk-aquifer catchment, with a high degree of hydrological connectivity, multiple private water supplies within 250m, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- Site 5 is directly hydrologically connected to the Tas via a stream, ditches and a brick culvert posing contamination risk.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

5. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.
- The settings of Grade I St Catherine’s Church Fritton and Grade II Church Farm, as well as the adjoining Fritton Conservation area would be significantly negatively impacted by a 400KV substation and utility solar infrastructure on this site. Visualisations are misleading as they are not taken during leaf-off periods.
- This scheme would industrialise a rural historic landscape of high sensitivity.
- These are location-based harms which arise because this is the wrong place for a scheme of this scale.

6. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 6 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant’s own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area.
- This new evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The proposed tilting panels will be horizontal at night – research shows that bats confuse solar fields for water bodies which has an impact on their ability to hunt.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Water environment

- Site 6 sits in a highly sensitive chalk-stream (Tas)and chalk-aquifer catchment, with a high degree of hydrological connectivity, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

4. Ground Contamination and Soils

- Site 6 has been proposed as a construction compound and an EIA mitigation area – these two functions are incompatible
- Using this area as a construction compound risks ground contamination, soil compaction and damage to existing ecology
- The site has been identified as Grade 2 BMV land, it is heavy clay soil. Peer-reviewed research demonstrates that it is unlikely to be possible to return this BMV land to its former quality after this degree of compaction.

5. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.
- This site has been removed from the scheme due to its proximity to Grade II Listed Buildings, however no impact assessment has been made of the harms to these buildings of using this area as a construction compound.
- These are location-based harms: they arise because this is the wrong place for a scheme of this scale.

6. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 7 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary. Regional transmission solar capacity targets are already met.

- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area. Multiple maternity colony core sustenance zones overlap the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- Favourable Conservation Status cannot be guaranteed.

3. Ecology – White Clawed Crayfish

- Site 7 is directly hydrologically connected to the Tas and it is proposed to drill under the Tas to link sites 5 and 7.
- Norfolk Rivers Trust Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish in the Tas
- East Pye Solar’s aquatic surveys were carried out when streams and ditches were dry, which is unacceptable given that this is a Chalk Stream Catchment known to be a habitat of White Clawed Crayfish.

4. Ecology – Rare botany

- Site 7 and its access routes and cable corridors is known to support vanishingly rare assemblages of rare botany.
- Despite proposals for road widening and haul roads, no botanical survey has been carried out.
- A level 6 botanist familiar with the botanical record has written to East Pye Solar stating that full season botany surveys must be carried out before the project progresses further.

5. Water environment

- Site 7 sits in a highly sensitive chalk-stream (Tas) and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

6. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.
- Site 7 is so large that the settings of multiple Grade II* and Grade II Listed Building and conservation areas are impacted.
- This scheme would industrialise a rare rural historic landscape of high sensitivity.
- This the wrong place for a scheme of this scale.

7. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 8 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant’s own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area, and specifically in Shotesham woods.
- This new evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and

fragmentation.

- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Ecology – White Clawed Crayfish

- Site 8 is directly hydrologically connected to the Tas Chalk Stream
- Norfolk Rivers Trust Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish in the Tas.
- East Pye Solar has ignored this evidence and erroneously stated that the Tas Chalk Stream is unlikely to support White Clawed Crayfish.

4. Ecology – Rare botany

- Site 8 and its access routes and cable corridors is known to support vanishingly rare assemblages of rare botany.
- Despite proposals for road widening, no botanical survey has been carried out.
- A level 6 botanist familiar with the botanical record has written to East Pye Solar stating that full season botany surveys must be carried out before the project progresses further.

5. Water environment

- Site 8 sits in a highly sensitive chalk-stream (Tas) and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

6. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence. This scheme impacts the setting of the Shotesham Conservation Area.
- An independent Landscape Architect has judged that this is a valued landscape and that the harm would be significant.

7. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 9 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant’s own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area, and specifically in Brooke woods.
- This new evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Ecology – Rare botany

- The access routes and cable corridors connecting to site 9 are known to support vanishingly rare assemblages of rare botany.
- Despite proposals for road widening, no botanical survey has been carried out.
- A level 6 botanist familiar with the botanical record has written to East Pye Solar stating that full season botany surveys must be carried out before the project progresses further.

4. Ecology – ancient hedges and ditches

- We have evidence that in preparation for the East Pye Solar project, the landowner has already removed an ancient hedgerow (during nesting season) and filled in an ancient ditch on this site without permission.

5. Water environment

- Site 9 sits in a highly sensitive chalk-stream (Tas) and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.

6. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.

7. Socio-economic

- Existing tourism businesses will be severely negatively impacted by this scheme in this location.

8. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: “I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location.”

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Site 10 – I Object to East Pye Solar:

1. No need for this scheme in this location

- The applicant relies on a general national need for solar, but has not shown why this particular site in this specific location is necessary.
- The applicant’s own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges.
- General claims about ‘optionality’ and ‘attrition’ do not justify major harm in a highly sensitive location.

2. Ecology - barbastelle bats

- This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area.
- New evidence identifies multiple maternity colony core sustenance zones overlapping the entire site and cable corridor.
- Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.
- The Peer-reviewed research indicates ground-mounted solar reduces bat activity through habitat loss and fragmentation.
- Favourable Conservation Status cannot be guaranteed by building this infrastructure on this site.

3. Water environment

- Site 10 sits in a highly sensitive chalk-stream and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Norfolk Broads National Park, private sewerage and vulnerable water receptors surrounding the scheme.
- Impacts on private sewerage and hydrological connectivity have not been assessed at all.
- This project poses a significant risk to public health and ecology and there is insufficient modelling to ascertain true impacts.

4. Heritage and landscape

- This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence.
- The risk to the setting of Listed Buildings has not been properly addressed, only in terms of visual proximity.

5. Seething Airfield

- The solar infrastructure at site 10 poses a threat to Seething Airfield, as recognized by East Pye Solar.

- No on-site surveys or modelling have been done.
- No safety impacts have been assessed beyond Glint and Glare, which was acknowledged as a significant impact, resulting in scheme changes.

6. Socio-economic

- Existing tourism businesses will be severely negatively impacted by this scheme in this location.

7. There is no benefit to our communities in hosting this scheme, only harm.

Suggested closing line: "I object because the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location."

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