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Working locally and nationally to promote, protect and enhance a beautiful and thriving countryside for everyone's benefit.

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The East Pyes Solar Farm – Registration of Interest

Dear Madam or Sir,

We are writing to you to register to have our say in the examination of the NSIP proposal 'The East Pye Solar Farm'.

CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation. However, this support is not unconditional. Renewable energy developments must be appropriately sited and designed to avoid unacceptable harm to the countryside, landscape character, agricultural land, and rural communities. In our view, the proposed East Pye Solar Farm fails to meet these requirements.

The National Planning Policy Framework (NPPF) requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes and recognising the intrinsic character and beauty of the countryside.

While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the East Pye Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles.

The proposal would introduce an industrial-scale development into an open agricultural landscape, fundamentally altering its character. CPRE Norfolk is particularly concerned about the cumulative impact of large solar installations across rural Norfolk, which would cause industrialisation of the countryside.

The Landscape Character Assessment identifies a key landscape type relevant to the East Pye Solar Farm. The solar farm lies within the South Norfolk Claylands. Furthermore the South Norfolk Local Landscape Designations Review (2012) classifies the landscape as Rural River Valley and Tributary Farmland Landscape Character types. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.

The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of 4.5m solar panels across thousands of acres introduces an extensive, visually intrusive feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquillity valued in the countryside.

Associated infrastructure fences and security cameras, inverter buildings, substations and new access roads as well as a large grid substation would add additional significant industrial/artificial features into a landscape which is currently attractive and tranquil. Development of this kind in open countryside is contrary to local and national policies.

NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant harm to a landscape which cannot be adequately mitigated.

This development would result in substantial visual harm. Views from nearby villages and public footpaths may be affected, potentially reducing the visual quality of the countryside. No robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 40/60-year operational period. Furthermore much of the mitigation on offer, e.g. planting hedgerows, would destroy current open attractive views along footpaths and minor roads.

In addition the proposal does not recognise 'the intrinsic character and beauty of the countryside' as required by NPPF (Dec 2024) para. 187b. Although the proposal does include planting, screening, minimal lighting etc. it still proposes to alter the intrinsic character of the countryside site through the imposition of solar arrays and several alien structures. Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 40/60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)

The development is situated within a landscape characterized by rural tranquility. Much of this landscape is notably identified on the Countryside Charity (CPRE) Tranquility Map as a region of high tranquility, indicating its value for quiet enjoyment and natural beauty.

CPRE's Tranquillity Map, developed through research by Northumbria University, assesses areas based on factors such as naturalness, noise levels, and human activity. The map highlights regions where tranquillity is prevalent and those where it is diminished due to factors like infrastructure and urban development. While the most recent national tranquillity map was published in 2007, it provides valuable insights into the landscape context of proposed developments like the East Pye Solar Farm.

The East Pye Solar Farm's location in South Norfolk District, falls within an area identified as having high tranquillity. This designation underscores the importance of the landscape for local communities and wildlife. The introduction of a large-scale solar farm in such a setting raises concerns about potential impacts on the area's tranquil character.
The development of the East Pye Solar Farm may introduce elements that could affect the area's tranquillity, including:

- Visual Intrusion: The presence of large solar panels, security fencing, and associated infrastructure could alter the open, rural vistas characteristic of the area.
- Noise: Operational sounds from the solar farm and associated facilities might introduce noise into an otherwise quiet environment.
- Light Pollution: Increased lighting for security and operational purposes could affect the natural night-time environment.

This stands in line with Paragraph 198 of the NPPF that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation.

The submitted information does not, in our view, demonstrate that landscape and visual impacts have been adequately avoided or minimised, as required by both national policy and good planning practice. Screening and mitigation cannot fully address the long-term change in land use and character that this development would introduce.

CPRE Norfolk has longstanding concerns about the loss of agricultural land to large-scale solar development. The NPPF seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a). Where such land is affected, applicants are expected to demonstrate that poorer quality land is unavailable and that the development is necessary in that location.

We are not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations—such as previously developed land, commercial rooftops, car parks, or less sensitive sites—have been properly explored.

CPRE has consistently advocated a "rooftops first" approach to solar deployment. Large-scale ground-mounted solar should not be treated as the default option where less harmful alternatives exist. The application fails to demonstrate that a sequential approach to site selection has been applied, contrary to the principle of sustainable development. Research by UCL for CPRE demonstrates that 117GW of solar energy is obtainable from roofs and artificial surfaces by 2050.

CPRE Norfolk endorses comments made by 'Block East Pye Solar' in particular the following comments.

'The scheme would cause extensive and, in several respects, unmitigable harm to protected species including Barbastelle bats, chalk-stream ecology, ancient woodland and SSSI-linked habitats, designated and non-designated heritage assets, including churches, listed buildings and conservation areas, best and most versatile agricultural land, rural communities, public rights of way, landscape character and local infrastructure. These harms are location-specific and cannot be made acceptable simply by later mitigation, planting, management plans, or post-consent licensing. They are not outweighed by any demonstrated regional need for this scheme in this location, particularly where the applicant has not shown that East Pye Solar is required to meet East Anglia's renewable energy targets or that less harmful alternatives have been properly assessed. The project therefore fails the basic planning balance: it would impose severe, long-term and legally significant harm on South Norfolk without a compelling, site-specific public need.

The applicant relies on a general national need for renewable energy. That is not sufficient to justify placing this particular scale of industrial solar and electricity infrastructure in this particular location. We understand that regional transmission solar capacity targets are met or exceeded by existing, consented and pipeline projects, and that general claims about "optionality" or attrition do not justify severe harm in a highly sensitive landscape.'

The proposal is inconsistent with the objectives of national and local planning policy, which seek to protect distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside.

This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm.

Yours sincerely,
Barbara Adamski (Planning Officer / CPRE Norfolk)