Gayton Parish Council
c/o 2 Milton Road
Gayton NN7 3HE

Samuel Dix
West Northamptonshire Council
South Northamptonshire Area Office
The Forum Moat Lane
Towcester
Northamptonshire NN12 6AD

25 November 2021

Dear Samuel,

Re: WNS/2021/1858/EIA

Gayton Parish Council write with regard to the above referenced planning application for the proposed construction of a 170-acre industrial solar installation on open fields located adjacent to our village. The Parish Council support both Central Government's and West Northamptonshire Council's (WNC) sustainability and renewable energy initiatives. However, the proposed location and scale for this industrial installation is inappropriate, covering large areas of productive arable land adjacent to the Gayton Village boundary and in close proximity to two historic Conservation Areas.

Earlier this year, when the applicant attempted and failed to avoid the requirement for an EIA, the Parish Council surveyed all Gayton Village residents for their opinion and the vast majority, 85% of responses, expressed a wide range of objections and concerns. The Parish Council therefore fully supported the decision of WNC Officers on the EIA screening request, noting that the proposed development would have 'significant environmental effects on landscape and visual impact'.

Having reviewed all the documentation now included within this planning application, Gayton Parish Council can see no new evidence or mitigation to alter their opinion and therefore would like to register their strong objection to these proposals. There are a number of significant objections that have been raised by Parish Councillors and residents which are noted for your attention below:-

1. Loss of Productive Arable Land
2. Negative Landscape Impact
3. Loss of Open Field Wildlife Habitats and Ecology Impact
4. Negative Impact on Gayton Conservation Area
5. Negative Impact on Grand Union Canal Conservation Area
6. Undermining of Local Tenant Farm Businesses and Employment
7. Negative impact on Local Tourist Businesses and Employment
8. Noise Generation
9. Cumulative Development Impact
10. Traffic Impact on Highway Network and Local Villages
11. Temporary Use with Undefined Reinstatement Plan or Costings

Explanatory notes, details and justifications for our objections are set out in the attachments to this letter.

We would be more than happy to meet with WNC Officers, Councillors and Strategic Planning Committee Members for a site meeting to discuss and walk the ground. We feel this would be highly beneficial and we would urge this offer to be taken up due to the significant scale of the proposals, the rolling high ground

topography of the area and the extremely close proximity to the Village of the proposed 170-acres of industrial solar installations.

Please take this letter as our strong objection to these proposals.

Also, please let us know if you would like to arrange a site meeting.

Kind regards,

Yours sincerely,

Roger Clarke

Nominated Parish Councillor on behalf of Gayton Parish Council

cc.

Jim Newton - Assistant Director Growth, Climate and Regeneration, WNC

Paul Seckington – Head of Development, Enforcement and Land Charges (interim) WNC

Viv Hartley – Parish Clerk, Gayton Parish Council

Parish Clerk, Rothersthorpe Parish Council

Attachments - supporting Appendix, extracts, imagery and documentation

Appendix

1. Loss of Productive Arable Land
2. Negative Landscape Impact
3. Loss of Open Field Wildlife Habitats and Ecology Impact
4. Negative Impact on Gayton Conservation Area
5. Negative Impact on Grand Union Canal Conservation Area
6. Undermining of Local Tenant Farm Businesses and Employment
7. Negative impact on Local Tourist Businesses and Employment
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1. **Loss of Productive Arable Land**

Maintaining land use provision for agriculture and, specifically, arable farming is now vital for the UK to ensure sufficient levels of domestic food production independence. The Applicant claims that all the 170-acres of productive arable fields that they propose to cover in industrial solar installations are a mix of Agricultural Land Classification (ALC) Grade 3A and 3B. However, this is not in line with DEFRA's classification of the area where they identify that a large area of the south site field, adjacent to the Gayton Village boundary, is Grade 2 - 'Very Good'. See DEFRA East Midlands ALC extracts attached below and refer to www.naturalengland-defra.opendata.arcgis.com.

The Buildings Research Establishment advise that Grade 2 and 3A land is considered 'Best and Most Versatile' and National Planning Policy would not support development on Grade 2 land and, for Grade 3 land, a clear explanation is required as to why an industrial solar development needs to be located on this site and not on land of a lesser ALC. However, in terms of site selection, the Applicant has admitted they did not source the site, but rather were approached directly by the new landowner seeking alternative uses rather than allowing the longstanding tenant farmers to continue food production operations on the land.

Also, it appears the power network connection for this site is some distance away in central Northampton and when challenged, the Applicant did not know that there is another existing industrial solar site just north of Rothersthorpe or that there is a live application for a new 50MW scheme at J16 M1 just some 6Km north-west of Gayton. Note - the Rothersthorpe site is located on very poor quality land – an old tip site. In reality, the Applicant has not made any justification for taking this land out of arable food crop production, but rather it would appear that they have settled on the site because the landowner has made it available to them.

Further, we feel a more obvious, practical method of understanding the true quality of arable land is to review the productivity of the fields and the crop yields they actually produce. This season, the harvest on the south site field performed well, as has been the case for many years, yielding **9.13 tonnes per hectare** of high-quality milling wheat sold to Heygates, the local mill. This compares extremely well against the average wheat yield in the UK estimated at 8.1–8.3 tonnes per hectare. Therefore, this 70-acre field produced a yield nearly **13% better than the UK average**. We strongly suggest that the south site field is better quality land than suggested and that both sites should not be taken out and lost to food production.

Refer to WNC Policy –

- **G3 (8)**
- **EV3**

See below -

- **DEFRA East Midlands ALC map extracts**
- Refer to - www.naturalengland-defra.opendata.arcgis.com

Harvesting in the Industrial Solar South site Summer 2021 viewed from Milton Road

A yield of ***9.13 tonnes per hectare*** of high-quality milling wheat was achieved (sold to Heygates, the local mill) - considerably greater than the UK average yield which is c.8.1 tonnes per hectare

East Midlands Region

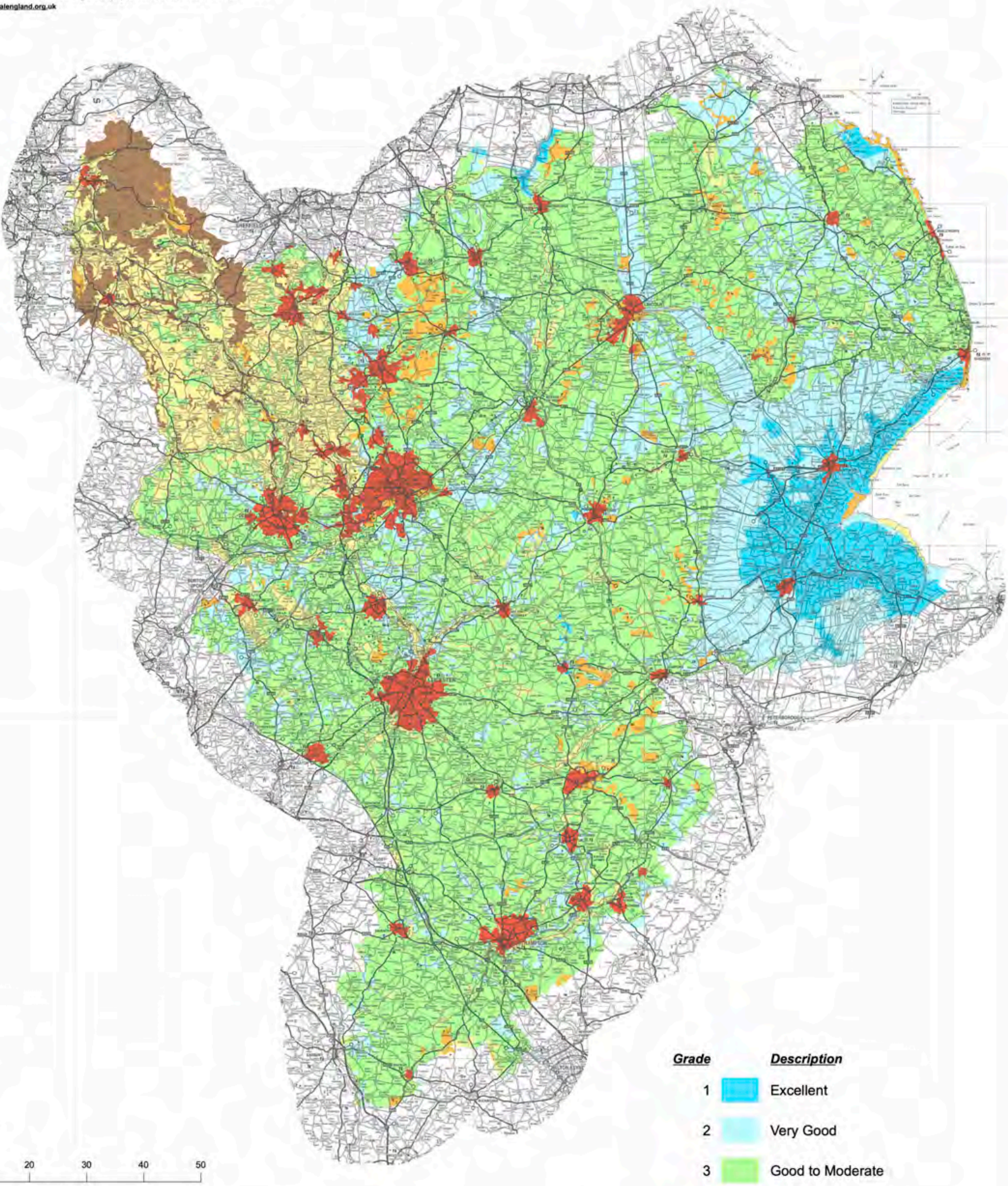
1:250 000 Series Agricultural Land Classification

This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

1:250 000 at A0

Further information
Details of the system of grading can be found in: Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land. **www.defra.gov.uk**

For further information about the availability of Agricultural Land Classification data, including more detailed local surveys, please contact the Natural England Enquiry Service on 0845 600 3078 or e-mail **enquiries@naturalengland.org.uk**



1:250,000 at A0

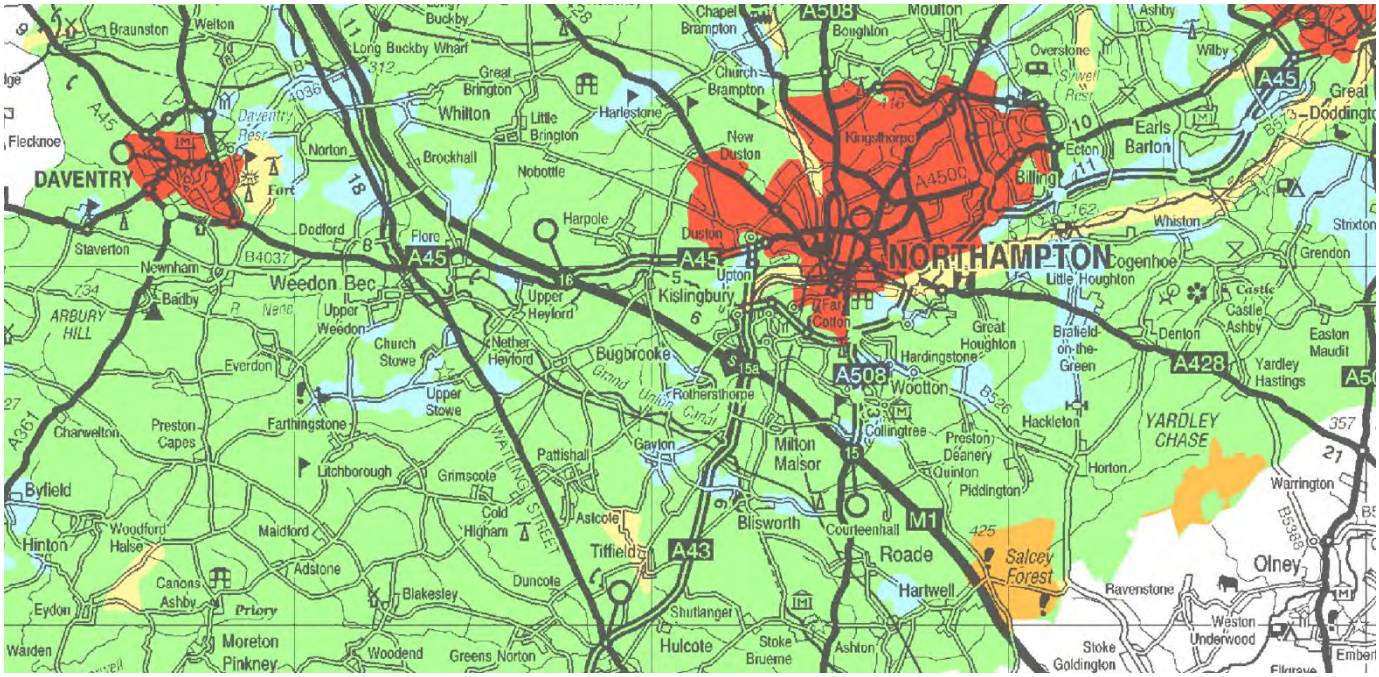
0 5 10 20 30 40 50
Kilometers

0 5 10 20 30 40 50
Miles

Grade	***Description***
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

Non-Agricultural Land

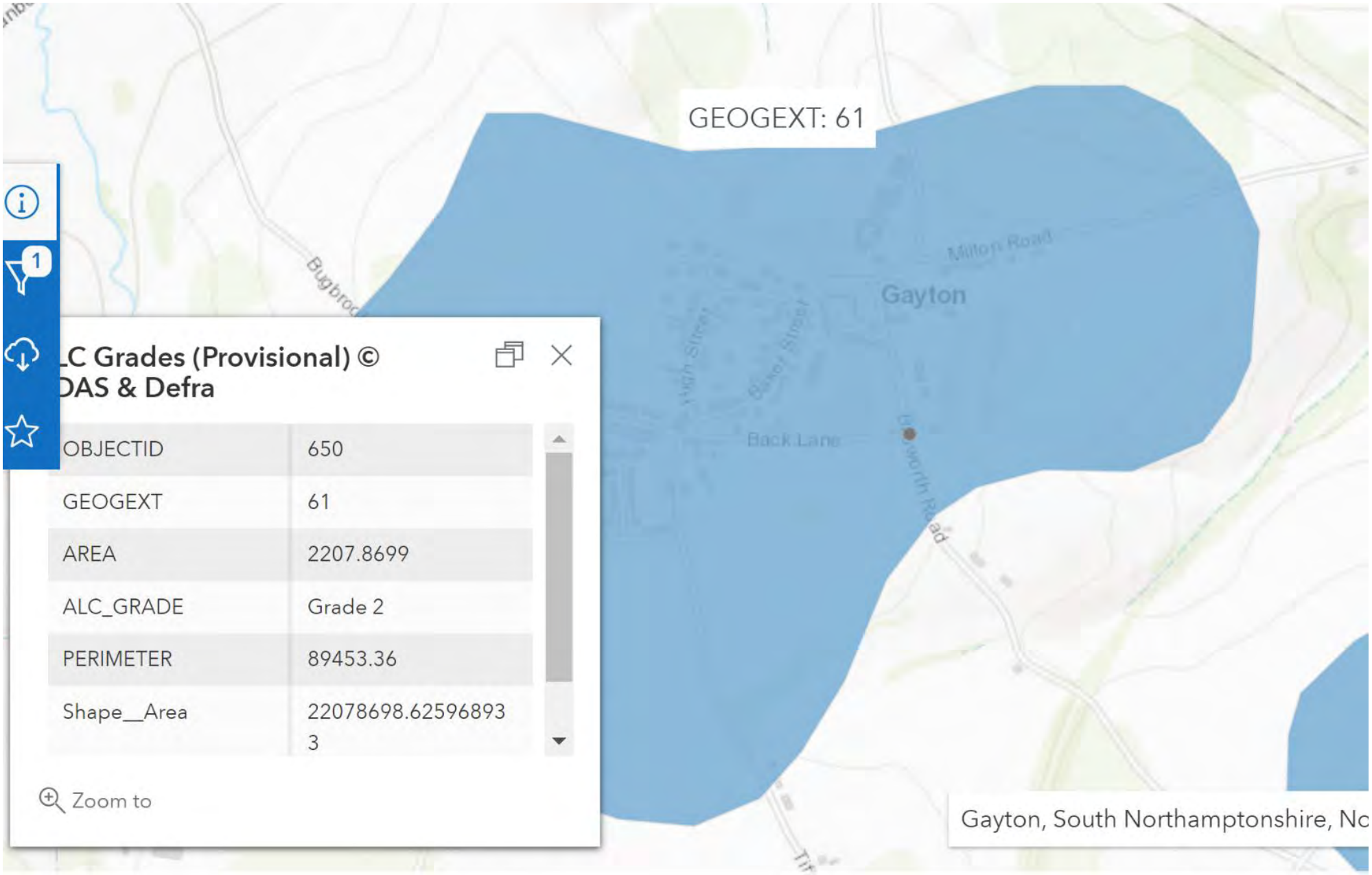
- Other land primarily in non-agricultural use
- Land predominantly in urban use



Map extract from DEFRA East Midlands ALC – blue shaded areas are Grade 2; note Gayton and surrounding fields below and see close-up map extract on next page.

A significant area of the southern field, directly adjacent to the Village, is currently classed as Grade 2

The DEFRA ALC mapping was updated 2019



From DEFRA - Blue shaded area indicates DEFRA ALC Grade 2 Land at Milton Road, Gayton covering the majority of the industrial solar south site

2. Negative Landscape Impact

The Applicant is incorrect in their claim that their scheme will not have 'undue or unacceptable effects on landscape character and visual amenity'. Due to the rolling South Northamptonshire topography of the Gayton Village location and the surrounding arable fields, rising to 130m AOD, the sites are highly visually prominent throughout the local and wider Northamptonshire area with views up to the south site, adjacent to the Village boundary, and down into the north site fields. The south site is one of the highest points in South Northamptonshire clearly visible from as far distant as the railway line into Northampton over 3Km away.

The Applicant has been selective in the imagery they have submitted, whereas the range of photographs and viewpoints shown attached below clearly demonstrate the true impact of these proposals. The images have all been taken using standard photographic equipment with views at head height from either public highways, public footpaths or canal towpaths (except for the two aerial images). They clearly illustrate the impact of 170-acres of industrial solar installations on the wider Northamptonshire landscape and the local environment. They also highlight the impact on the character and setting of both historic Conservation Areas associated with the Village – Gayton Village Conservation Area and the Grand Union Canal Conservation Area.

The topography, high elevation and landform emphasise the initial view taken by WNC that the scale and extent of this proposal mean that it will be difficult to accommodate or mitigate in any way. Gayton Parish Council would be more than happy to meet with WNC Officers, Councillors and the Strategic Planning Committee Members for a site meeting to discuss and walk the ground. We feel this would be extremely beneficial for the WNC team to get a true perspective for the area and the vast extent of these proposals. We would urge this offer to be taken up due to the significant scale of the proposals, the rolling high ground topography of the area and the extremely close proximity to the Village.

Our opinion is supported by WNC policies listed below and identified within the Northampton Borough Council 'Northampton Urban Fringe Landscape Character and Sensitivity Study November 2018' (NBC Study extracts attached below). NBC commissioned this Study to identify and rank all the areas around the town throughout South Northamptonshire for their visual importance and landscape sensitivity. Not surprisingly, due to the quality of the countryside around Gayton, the Village itself and the high elevation of the Village including the surrounding open fields, Gayton is one of the very few sites highlighted as having 'High Landscape Sensitivity' and therefore of significant importance to the wider area around the town. No doubt protecting this landscape will become even more critical to NBC if the 'City status' bid is submitted.

Finally, the significant negative visual impacts of the proposals are further emphasised by their proximity to local rights of way, straddling key routes into the Village spanning Blisworth Road to Milton Road. Over **3km** of highways, public footpaths and canal towpaths would run adjacent to, or through, the 2.4m steel security fenced 170-acres of solar installations, sub-station and transformers (and, although not mentioned by the Applicant, large scale industrial battery storage which will no doubt be required if the scheme is consented). Even with the areas of existing mature foliage or the mitigations proposed by the Applicant, it will not be possible to successfully screen 170-acres of industrial development in this highly sensitive location.

Refer to WNC Policy –

- **G1**
- **G3 (1), (3), (4) & (12)**
- **EV10-V1**

- EV1 (1), (2), (3) & (4)
- E7

See below –

- Gayton Viewpoints
- Northampton Borough Council Northampton Landscape Sensitivity Study 2018 extract

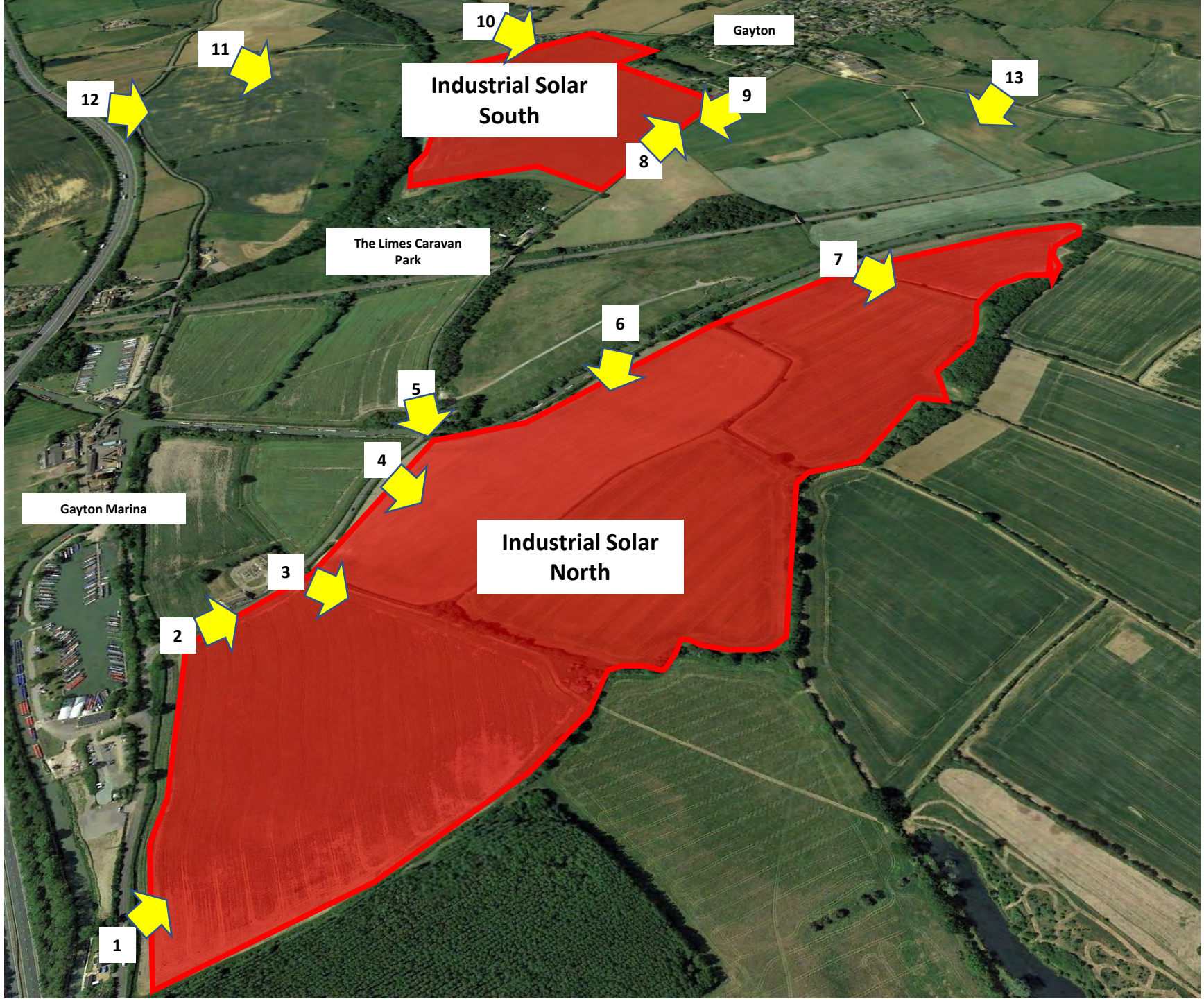
Local Viewpoint Positions

The following images are taken using standard photographic equipment with views at head height from either public highways, public footpaths or canal towpaths (except for the aerial image)

Illustrates the impact of the 170 acres industrial solar installations on the wider Northamptonshire landscape and the local environment

Also illustrates the impact on the character and setting of both Historic Conservation Areas

The rolling topography, landform and elevated position of Gayton emphasise the view taken by WNC that the scale and extent of this proposal mean that it will be difficult to accommodate or mitigate




1. Industrial Solar North viewed from Milton Road


2. Industrial Solar North
viewed from Milton Road

3. The public footpath to Rothersthorpe running directly across Industrial Solar North


4. Indusrial Solar North viewed from Milton Road and *adjacen*t to the Grand Union Conservation Area

5. Industrial Solar North viewed from inside the Grand Union Canal Conservation Area, directly from Milton Road on the Grade 2 Listed ‘Turnover’ Bridge

6. Industrial Solar North viewed from inside the Grand Union Canal Conservation Area on the canal towpath – Industrial Solar North extends for approximately *1km* alongside the Conservation Area and towpath

7. Industrial Solar North viewed from the public footpath to Rothersthorpe

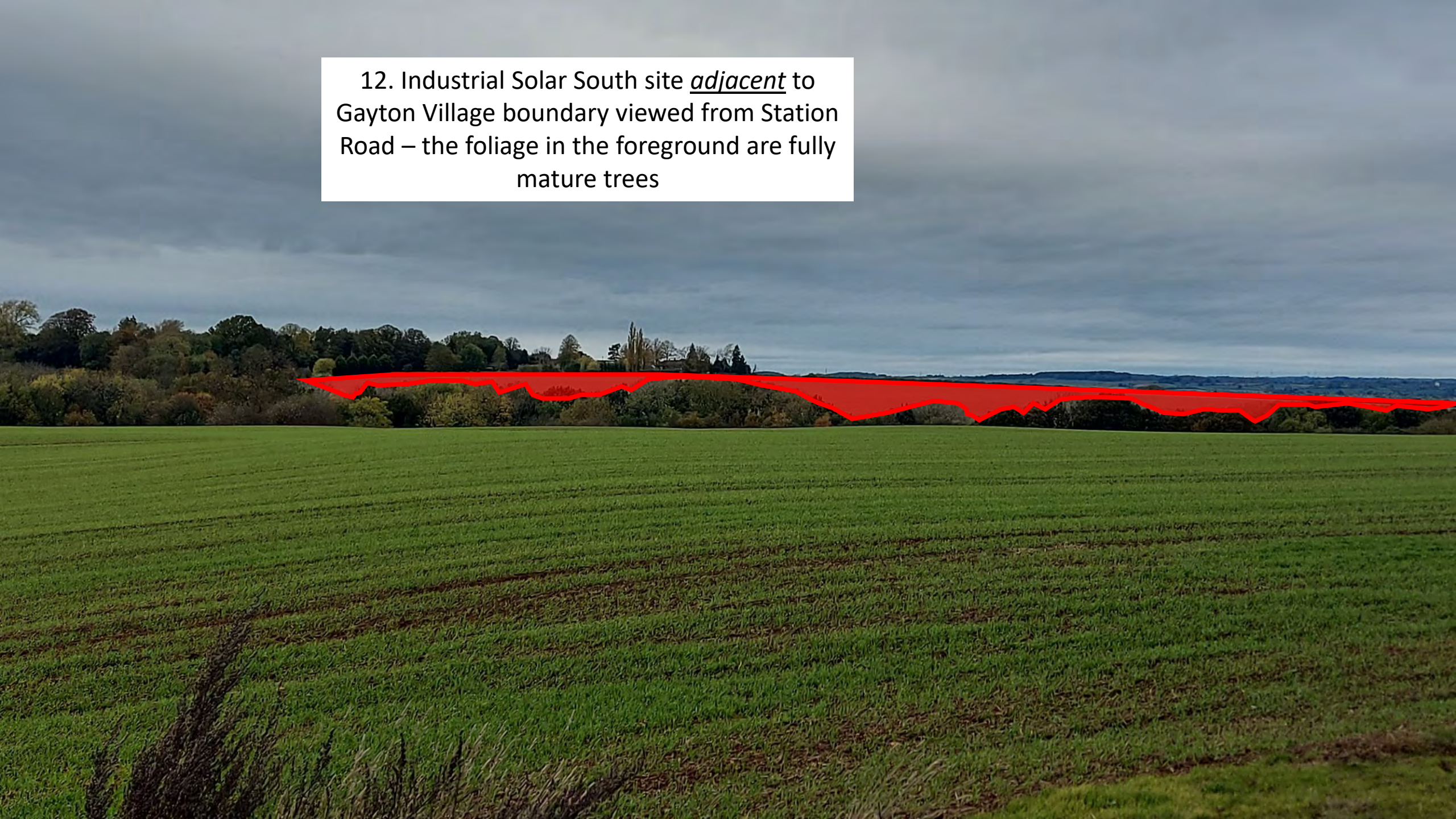
8. Industrial Solar South directly *abutting* Gayton Village boundary and local homes, and in very close proximity to the historic Conservation Area viewed from the edge of the Milton Road verge


9. Industrial Solar South viewed from Milton Road *adjacent* to Gayton Village boundary

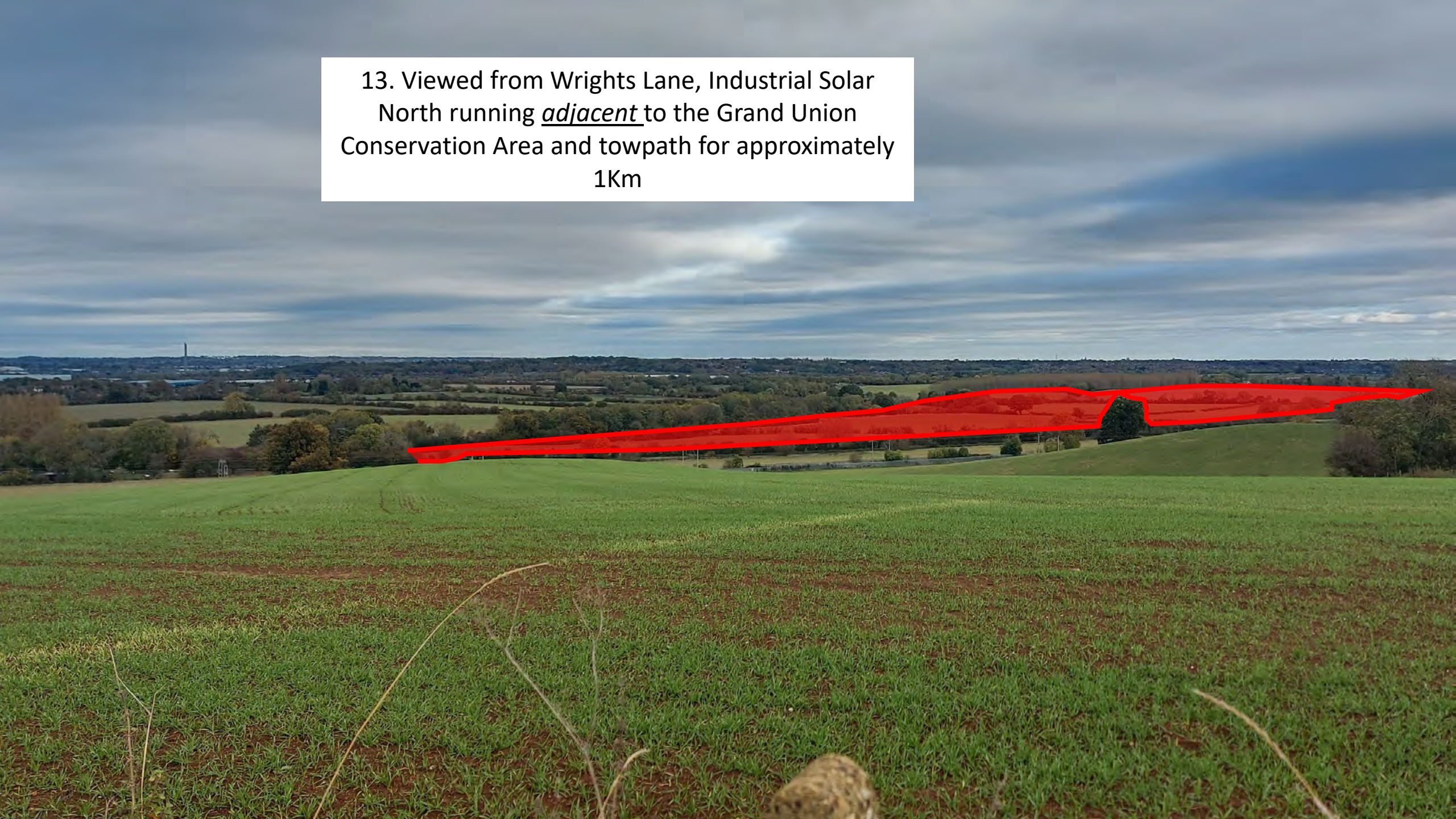
10. Aerial photography illustrating the impact of Industrial Solar South on the character and setting of Gayton, located on high ground visible from over 3km away on the Northampton rail line

Site is ***adjacent*** to the Village boundary and local homes, and in very close proximity to the historic Conservation Area


11. Industrial Solar South site *adjacent* to Gayton Village boundary and local homes viewed from Blisworth Road – the foliage in the foreground are fully mature trees


12. Industrial Solar South site *adjacent* to Gayton Village boundary viewed from Station Road – the foliage in the foreground are fully mature trees

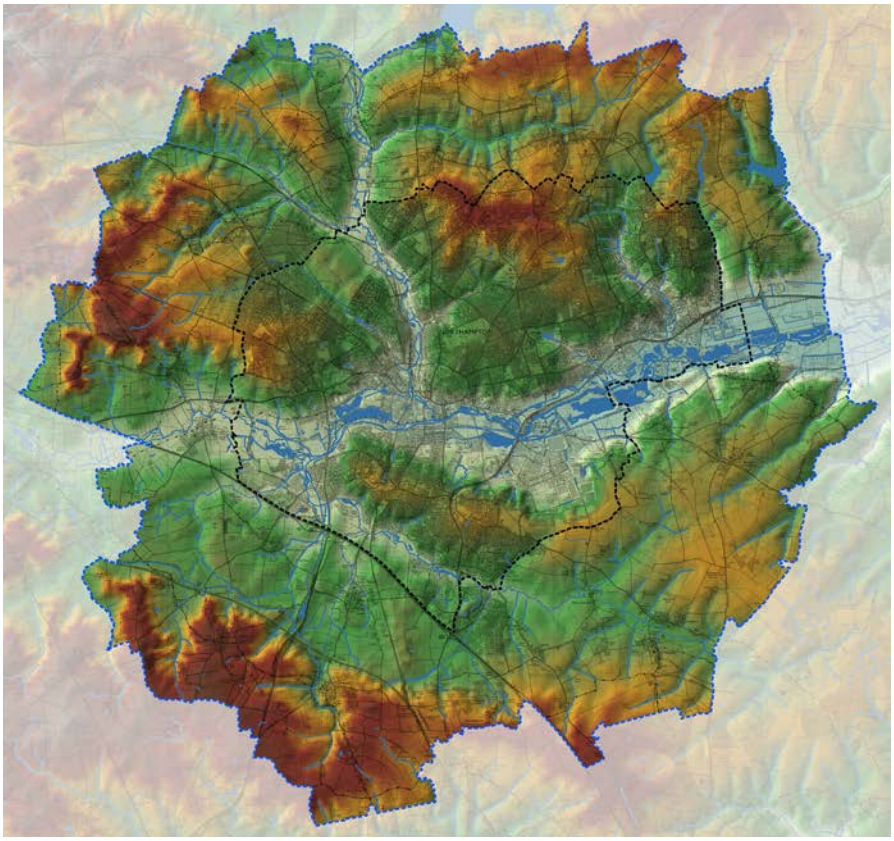
13. Viewed from Wrights Lane, Industrial Solar North running *adjacent* to the Grand Union Conservation Area and towpath for approximately 1Km



CHRIS BLANDFORD ASSOCIATES
landscape | environment | heritage

Northampton Borough Council

Northampton Urban Fringe Landscape Character & Sensitivity Study



November 2018

Executive Summary

Background

In May 2018, Northampton Borough Council commissioned Chris Blandford Associates to prepare the Northampton Urban Fringe Landscape Character & Sensitivity Study.

The key purpose of the Study is to provide a detailed understanding of the character and sensitivity of the landscapes within and surrounding Northampton. The updated evidence base will be used by the Council to inform the assessment and allocation of sites for the emerging Northampton Borough Local Plan Part 2. It aims to assist in managing change to the character of Northampton's urban fringe landscapes by providing advice on the sensitivities of the landscape to accommodate development, and offering guidance on opportunities to help protect and enhance landscape character.

The Study Area was drawn widely to incorporate not only landscapes and townscapes within Northampton Borough, but also encompasses rural landscapes within the neighbouring authority areas of Daventry District, Wellingborough Borough and South Northamptonshire District. This evidence was commissioned by Northampton Borough Council. It should not be considered to be a material consideration for planning applications relating to land outside Northampton.

Landscape Sensitivity within the Study Area

The key findings of the assessment of the sensitivity of Local Landscape Character Areas within the Study Area to development-led change are summarised below:

Local Landscape Character Area (see Figure 2.9)	**Overall Landscape Sensitivity** (see Figure 3.1)
4a Harlestone Heath	Medium Landscape Sensitivity
4b The Bramptons	Medium-High Landscape Sensitivity
4c Pitsford	Medium Landscape Sensitivity
4d Boughton & Moulton	Medium-High Landscape Sensitivity
4e Overstone Park	Medium-High Landscape Sensitivity
4f Ecton	Medium-High Landscape Sensitivity
5a East of Pitsford	Low-Medium Landscape Sensitivity
17a Brampton Arm Valley & Kingsthorpe Meadow	Low-Medium Landscape Sensitivity
13a Holdenby	Medium-High Landscape Sensitivity
13b Althorpe Park	Medium-High Landscape Sensitivity
13c Nobottle	Medium-High Landscape Sensitivity
13d Harpole	Medium-High Landscape Sensitivity
13e Rothersthorpe	Medium Landscape Sensitivity
13f Gayton	High Landscape Sensitivity
13g Milton Malsor	Medium-High Landscape Sensitivity
18a Nene Valley – Kislingbury	Medium-High Landscape Sensitivity
18b Nene Valley - Hunsbury Meadows	Medium Landscape Sensitivity
18c Nene Valley - Delapre	Medium-High Landscape Sensitivity
18d Nene Valley – The Washlands	Low-Medium Landscape Sensitivity
12a Great Houghton	Medium-High Landscape Sensitivity
12b Cogenhoe	Medium-High Landscape Sensitivity

LANDSCAPE SENSITIVITY WITHIN THE STUDY AREA				LANDSCAPE CAPACITY OF LAND WITHIN NORTHAMPTON BOROUGH		
Local Landscape Character Area (see Figure 2.9)	**County Landscape Character Type** (see Figure 2.9)	**Landscape Value**	**Overall Landscape Sensitivity** (see Figure 3.1)	**Land Parcel**	**Indicative Landscape Capacity** (see Figure 3.2)	**Recommended Development Scale**[23]
13e Rothersthorpe	Undulating Hills & Valleys	***Category:*** Medium-High Landscape Value ***Justification:*** LLCA 13e is evaluated as being of Medium-High Landscape Value. This is due to a combination of factors, including the presence of the historic village at Rothersthorpe, which contributes to strength of character. The Grand Union Canal, including a short stretch with a number of locks, is also a distinctive historic feature in the landscape. The LLCA is of value for recreational activity. Although the M1 motorway locally encroaches upon sense of tranquillity, and the landscape condition is moderate; the scenic quality of the landscape and the sense of tranquillity in places further from main transport routes contribute positively to landscape value.	***Category:*** Medium Landscape Sensitivity ***Justification:*** LLCA 13e is evaluated as being of Medium Landscape Sensitivity. This is due to its medium-high landscape value; largely 19th Century or later time depth, in combination with the presence of some distinctive features, which contributes to its strength of character; and the predominantly insignificant landform and intermittent tree cover, which largely makes intervisibility fairly low.	13e(i)	***Category:*** High Landscape Capacity ***Justification:*** Land Parcel 13e(i) is evaluated as being of High Landscape Capacity. Whilst the land parcel falls within an area identified as having medium-high value and medium sensitivity, this Parcel within the LLCA lacks the distinctive features found in the wider area, has recent time depth and has moderate to weak landscape condition. The parcel also has a significant quantity of industrial development already present, and the scenic quality of the area is fairly low. These local factors within the land parcel are thus judged to significantly reduce landscape sensitivity and value relative to LLCA 13e as a whole, giving a capacity of high.	Large-scale and/or Small-scale
				13e(ii)	***Category:*** High Landscape Capacity ***Justification:*** Land Parcel 13e(ii) is evaluated as being of High Landscape Capacity. Whilst the land parcel falls within an area identified as having medium-high value and medium sensitivity, this Parcel within the LLCA lacks the distinctive features found in the wider area, has recent time depth and has moderate to weak landscape condition. The parcel also has a significant quantity of industrial development already present, and the scenic quality of the area is fairly low. These local factors within the land parcel are thus judged to significantly reduce landscape sensitivity and value relative to LLCA 13e as a whole, giving a capacity of high.	Large-scale and/or Small-scale
13f Gayton	Undulating Hills & Valleys	***Category:*** Medium-High Landscape Value ***Justification:*** LLCA 13f is evaluated as being of Medium-High Landscape Value. This is due to a combination of factors, including the presence of the historic village at Gayton, which contributes to strength of character. The dismantled railway is also a distinctive historic feature in this landscape. Landscape condition is moderate to good, the scenic quality of the landscape, and the sense of tranquillity in places further from main transport routes contribute positively to the landscape value. The LLCA is also of value for recreational activity.	***Category:*** High Landscape Sensitivity ***Justification:*** LLCA 13f is evaluated as being of High Landscape Sensitivity. This is due to its medium-high landscape value; largely 19th Century or later time depth, in combination with the presence of some distinctive features, which contributes to its strength of character; and the predominantly dominant landform and intermittent tree cover, which largely makes intervisibility fairly high.	N/A	N/A	N/A

3. Loss of Open Field Wildlife Habitats and Ecology Impacts

All the many fields that will be lost under these proposals provide vital habitats for wildlife that require open arable fields to survive, including a range of rare birds and many other wildlife species. The fields themselves also provide habitat for a wide and varied range of existing plant species. In conjunction with this, the importance of the area extends well beyond the boundary of these proposals with the open fields supporting many migratory species that move through the area onto the various key Local Wildlife Sites (LWS). The Applicant's submitted information demonstrates some confusion over the extent of the various wildlife area consultation zones in the vicinity which will be impacted by 170-acres of industrial solar installations. They downplay the importance of the loss of these fields to the Upper Nene Valley Gravel Pits SSSI, other LWS and incorrectly assess the severe ecological impact as being 'moderate'.

If 170-acres of fields are covered, an extremely important area of traditional habitat will be lost impacting native and migratory species, not least many birds of prey, and Golden Plovers, Lapwings and Skylarks, all three of which are classed as endangered species. The Bedfordshire, Cambridge and Northamptonshire Wildlife Trusts also focus on this location including both sites entirely within their 2021 Plover and Lapwing Study Area (Wildlife Trust extract attached below – note Study Area map covering Gayton). Likewise, protected species such as Great Crested Newts and Brown Hares will have their habitats disturbed if not lost. The mitigations proposed do little to address, and in some cases will contribute to, such impacts. The loss of open field habitats for breeding and grazing birds, and other flora and fauna, cannot be compensated for by limited grass sowing.

Gayton Parish Council can see no justification within the planning application for removing such a significant area out of important habitats. The studies carried out by the Applicant have been very limited in nature and timescale, obviously not covering any range of the seasons for differing wildlife conditions.

Impact on Local Wildlife Sites

The SSSI Upper Nene Valley Gravel Pits SPA (SPD extracts attached below) is a site of international importance, hosting flocks in excess of 20,000 migratory birds. While the importance of this is acknowledged by the Applicant, other areas, including the Grand Union Canal Buffer Zone, which lies within the site, and the many other LWS that surround the area, are given little consideration. This confused message continues with the proximity of the site to the WNC Nene Valley Nature Improvement Zone not mentioned, although clearly shown on the Applicant's Map Fig. 3.1.

The development site has been wrongly declared on the same map as being outside an 8km consultation zone. This confusion may have arisen because the Applicant states the development site as being 7.2km from the SPA, but elsewhere determines the western extreme of the SPA to be Clifford's Hill (8km distant). Had this been correctly measured from the nearest gravel pit at (SP 78419 59696) then it would have been clear that the development site falls well within the limits of an 8km band. In any event, this is not the correct assessment for industrial solar installations of this scale. Consultation should have focussed on a **10km** zone which the sites are well within, as required in the WNC SPD.

Flora

The methodology for implementing the proposed wildflower planting regime will potentially have a negative effect on the unique biodiversity and quality of the land. The Applicant states that preparation of the soil for planting will entail 300mm deep disc harrowing and the removal of stones from the site. However, evidence from similar developments undertaken by the Applicant suggest that the entire 170-

acre site, including the perimeter grassland buffers, would be subject to topsoil strip, removing the existing species rich meadow already present. The Applicant denies this, but the photographs below, taken from one of their local recent schemes, shows that this is the case throughout their construction phases. This will change the characteristics of the site and it will be difficult to return it to its present condition at the decommissioning stage (although no decommissioning plan has been included).

Total site strip (Blisworth site) removing all vegetation on Applicant's industrial solar site at initial construction phase

Panel installation phase with whole site remaining bare (Blisworth site)

The Applicant's regime for wildflower planting could in fact reduce the species list by possibly 50% from the 60 species already present (see Gayton Existing Wildflower Survey 2021 attached below) to the 32 species in the EM10 grass mix that is proposed. This potential reduction would undoubtedly be emphasised with the new farming practices that are to be implemented from 2022 onwards, following the Government's new farming biodiversity White Paper. The White Paper is designed to encourage farmers to improve the biodiversity of their land through incentive schemes laid out in DEFRA's Sustainable Farming Incentive, Local Nature Recovery schemes and the Landscape Recovery scheme. These Government initiatives will drive far greater biodiversity than offered by industrial solar schemes whose developers have no incentive to enhance the sites they cover with industrial development.

Anecdotally, the local long standing tenant farming family, who currently farms one of the sites, fully intend to take up the biodiversity enhancing opportunities provided by the new White Paper. Clearly, this will not happen on the site if the industrial solar installation is consented.

Fauna

The mitigation strategies proposed by the Applicant for the severe disturbance to wildlife (birds, mammals and invertebrates and reptiles) are also inadequate and may even in some cases have a negative or, at best, neutral impact on the character and diversity of the site and could be labelled as 'green-washing'. For example, their inclusion of a Barn Owl nesting box when there is already one within the site and another 300m away.

The perimeter fencing around the site may have access points (no number specified) which will allow Brown Hare, Badger and Rabbits to enter the site, but once inside will be at greater risk of predation from Foxes given limited escape routes. Obviously, the 2.4m security and deer fencing will absolutely restrict Wild Deer species movements, regularly seen in the fields throughout the seasons (see photo below of Roe Deer in south site early 2021). Also potentially, the Applicant may require the use of a CCTV monitoring system to deter intruders. If installed, this will require mowing of the perimeter buffer zone to prevent false alarms, further impacting habitats.

Roe Deer crossing south site in early 2021

To support the obvious importance of the site as identified by its inclusion in the SSS1 Consultation Zone, local village residents and ornithologists regularly observe a wide range of species, not only local to the area such as Skylarks, but also migratory species such as Gold Plovers, Lapwings and a wide variety of Geese.

The Applicant is also dismissive of evidence of the presence of Great Crested Newts in the area and assumes that habitats will not be attractive since recorded sightings are not recent. However, a nearby site shown on the DEFRA mapping system (Magic) shows a GCN site less than 400m from the northern

site and there is anecdotal evidence of another population area covering a large part of the southern site.

The Applicant states that to avoid disturbance to nesting birds, a survey will be undertaken *if* work occurs between March and August. It is obvious that a 36-week construction period will inevitably extend into the season whenever the start date. Surveys must be mandatory and undertaken before any planning application is considered and certainly before any work starts and not dependant on a study being undertaken after work has started by which time nesting patterns will have already been disrupted.

In reality, if the scheme is consented, the substantial construction activity on site with plant rigs, multiple support pile installations, excavations for many km of cabling and the thousands of HGV movements will undoubtedly deter migratory birds and other local species from the site and the various LWS locations. The Applicant's assertion that it is unlikely that birds will frequent the site is probably true – they will have driven them away and the endangered migratory birds who thrive on the open fields around the SSSI will not return.

Conclusion

The Applicant makes various promises relating to wildlife surveys which will be undertaken either in the autumn/winter season to monitor the presence of migratory bird populations or in the spring/summer season to monitor hedgerow and ground nesting breeding. To accurately and correctly understand the area, a whole year of study will be needed to complete full analysis before any planning application can be considered, whereas their proposed study schedule would coincide with construction work which had already started and cannot reflect the true nature of the undisturbed land as it is currently.

Further detailed consultation must be undertaken regarding the Upper Nene Valley Gravel Pits SSSI/RAMSAR site as the development site t is clearly within 10km of the SSSI and other LWS.

The impact of the 2.4m perimeter security fencing and the fencing around public footpaths would have the effect of enclosing and sub-dividing the 170-acres of open field habitats, effectively isolating them from the wider local countryside environment and critical function as a wildlife corridor. Given the potentially significant negative impacts to biodiversity and existing flora and fauna, it is considered highly unlikely that the claimed overall enhancement to Biodiversity Metric 3.0 would ever be achieved.

Refer to WNC Policy –

- **Environmental Resources of the Area - Para 4.5**

See below –

- **Gayton Parish Council - Wildflower Survey**
- **Upper Nene Valley Gravel Pits SPA Supplementary Planning Document extract**
- **Bedfordshire, Cambridge and Northamptonshire Wildlife Trusts Upper Nene Valley Golden Plover and Lapwing Survey**

Gayton Parish Council - Wildflower Survey

Name of surveyor: Hilary Glanville (surveyor for National Plant Monitoring Scheme)

Date of survey: 5th June 2021

Grid ref for either end of 1km of hedgerow and field border: SP 71769 55321 - SP 70838 55546

Description: dense hawthorn hedge bordering arable field on one side and canal on other side.

Management: some mowing, weed killing, shoring up of bank where canal has leaked.

Height: generally up to 1m vegetation in border with hawthorn approx. 3m to 4m

Observed Species in Application Sites June 2021		
Cow Parsley	Spear Thistle	Dogrose
Hogweed	Bristly Ox-tongue	Woundwort
Common Vetch	Barren Brome	Rye Grass
Meadow Foxtail	Meadow Vetchling	Clover
Cleavers	Ivy	Cut Leaved Cranesbill
Creeping Thistle	Teasel	Mare's Tail
Bramble	Lesser Celandine	Ground Ivy
Hawthorn	Germander Speedwell	Herb Bennet
Herb Robert	Mayweed	Dandelion
Shepherd's Purse	Garlic Mustard	Great Plantain
Sloe	Pale Persicaria	Ash
Nettle	Brooklime	Burdock
Bulbous Buttercup	Greater Bittercress	Willow
Creeping Buttercup	Prickly Sowthistle	Meadowsweet
Field Forget-Me-Not	Knotgrass	White Dead Nettle
Nipplewort	Field Speedwell	Compact Rush
Yellow Rocket	Danish Scurvy Grass	Black Bryony
Broad-Leaved Willowherb	Celery Leaved Buttercup	Ragwort
Elder	Smooth Sowthistle	Moss
Cow Parsley	Hogsweed	Ragwort

Upper Nene Valley Golden Plover & Lapwing Survey

Bedfordshire
Cambridgeshire
Northamptonshire

Working in partnership with Natural England and the Northamptonshire Biodiversity Records Centre we are seeking to understand which areas and habitat types wintering populations of Golden Plover and Lapwing utilise outside of the Gravel Pits in the area. Both species forage for food and roost on a variety of sites including cropped fields, ploughed/stubble fields and pasture.

We are seeking records of both species until the **end of March 2021** from the area indicated in the attached map. This information will help us better understand the movements of these species during winter and identify areas or habitat types that are important to them. Spread the word #Northantsbirds

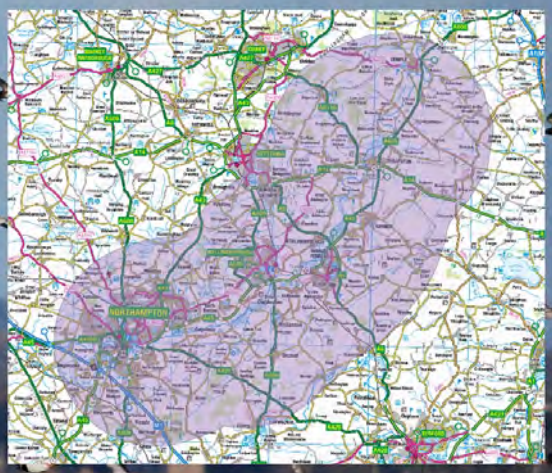
If you have seen any golden plover or lapwing please send your records to the NBRC via their website https://northantsbrc.org.uk/record/submit-a-sighting or via email nbrc@northantsbrc.org.uk.

Records should include:

- A count of each species
- Activity – feeding/roosting (if known)
- Date and time
- Location – grid reference*, map & description
- Habitat type – grassland/arable (if arable also a crop type and stage if known)
- Name of observer
- A photograph may be useful but is not essential

*biological records for this project are needed at high accuracy - we request **6 figure or above**

NBRC
Northamptonshire Biodiversity Records Centre



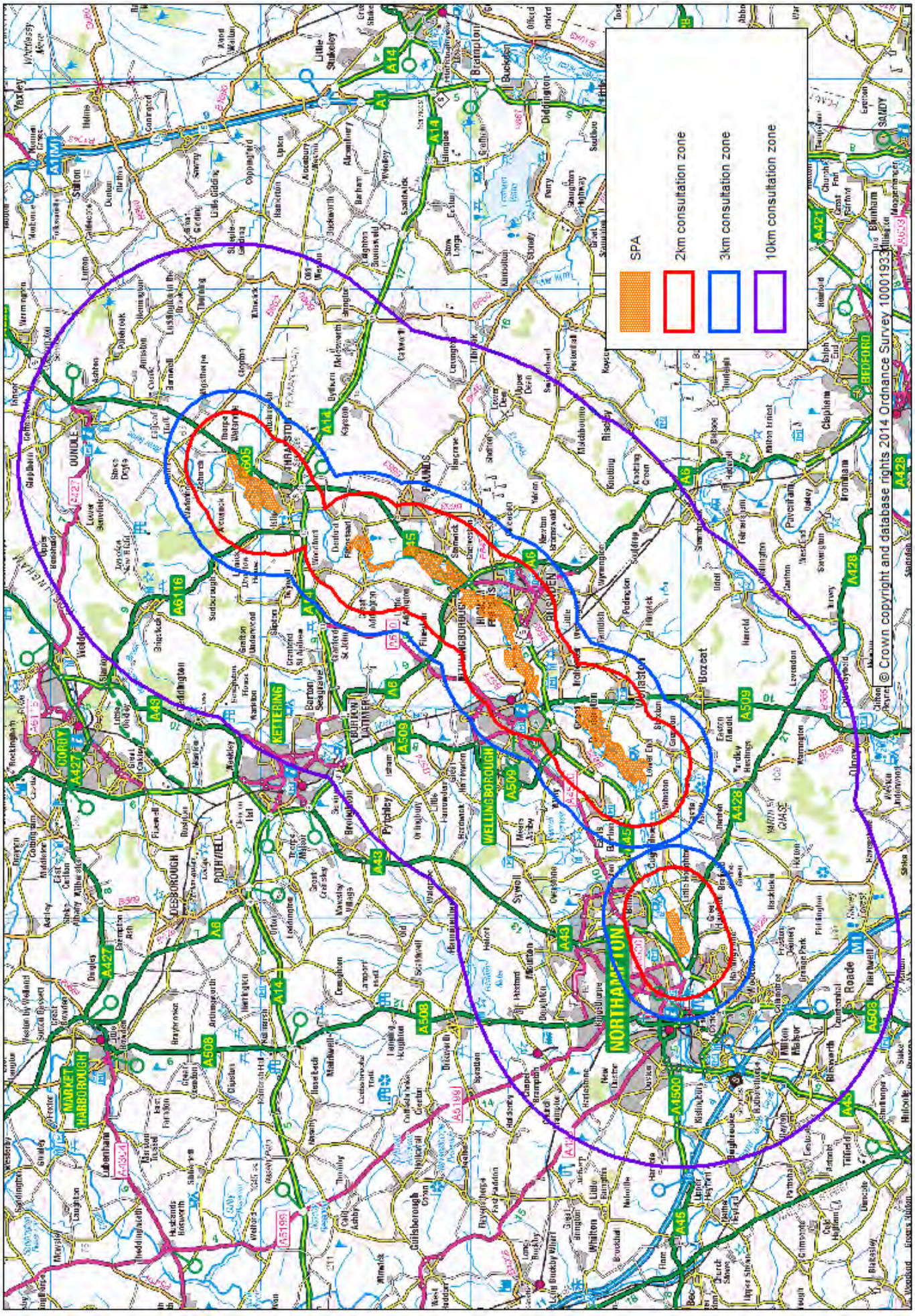
Upper Nene Valley Gravel Pits Special Protection Area

Supplementary Planning Document

Golden plover *Pluvialis apricaria*, Summer Leys Nature Reserve. Photo courtesy Nicholls of the Yard

August 2015

Appendix 4 SPA consultation zones



4. Negative Impact on Gayton Conservation Area

The Applicant claims that impact on the historic Gayton Conservation Area is limited and offers little mitigation in their proposals. This claim is incorrect. The Gayton Conservation Area Appraisal and Management Plan clearly sets out the importance of Gayton as 'a place of special character and historic interest'.

The Plan goes on to set out how to enhance and protect the Village highlighting the importance that any new development around the Conservation Area should not harm the 'character and setting of the Conservation Area itself' (WNC Gayton Conservation Area Plan extract attached below). The Plan also goes on to state that 'sources of renewable energy have the potential to harm the character and appearance of a conservation area'.

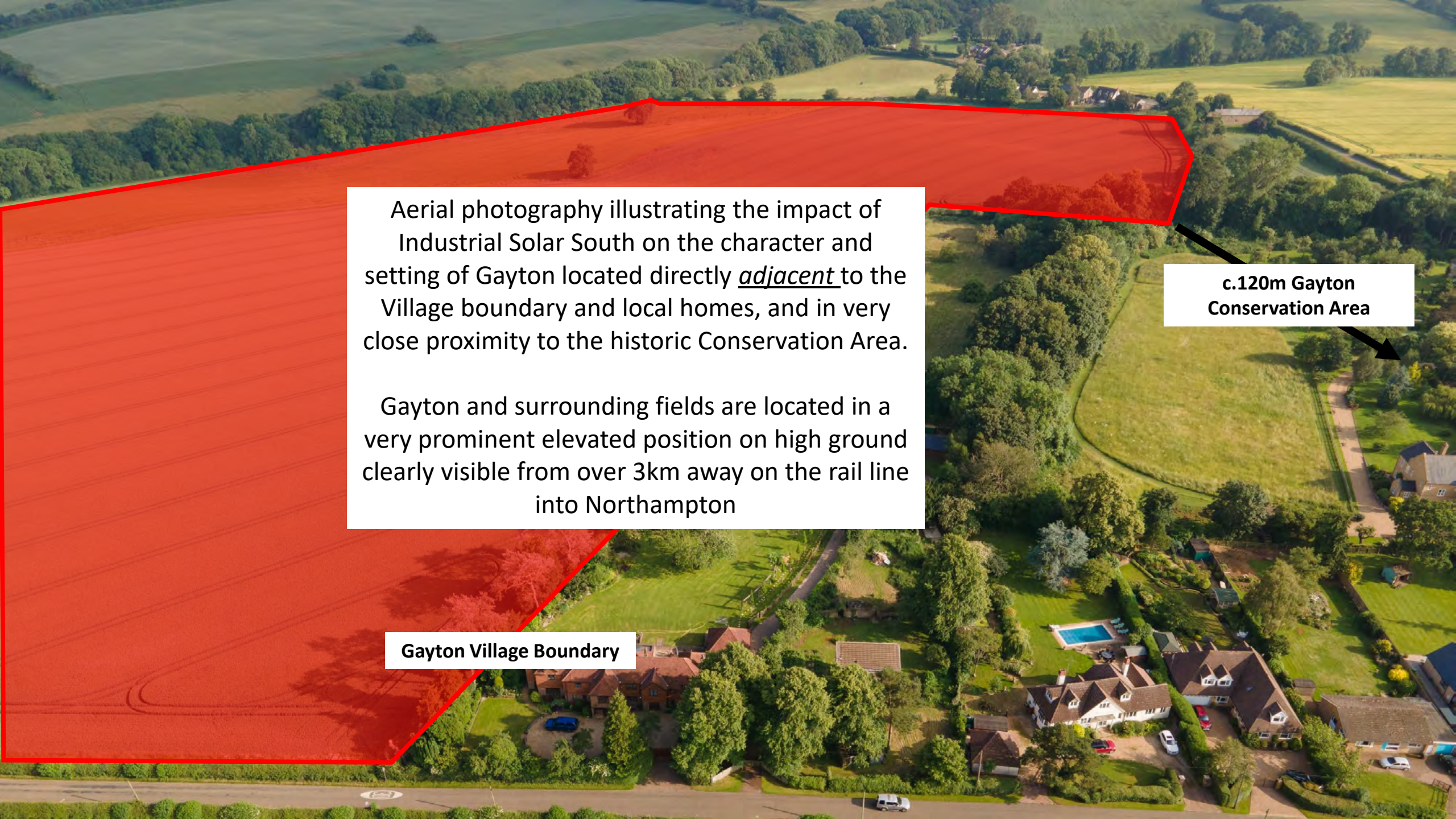
From the attached photographs in Section 2 of this Objection Letter and those below, the impact of 170-acres of industrial solar development can clearly be seen on the historic Gayton Conservation Area. Effectively, a massive industrial installation, over three times the size of the actual Village, located on open fields directly abutting the Village boundary, adjacent to residential areas and only c.120m from the Conservation Area cannot avoid having an extremely significant negative impact on the character and setting of the Conservation Area and the Village itself.

Refer to WNC Policy –

- **EV1 (1), (2), (3) & (4)**
- **EV7**
- **EV10-V1**
- **EV11**
- **RC7 – 7.25**

See below –

- **South Northamptonshire Council (now WNC) Gayton Conservation Area Appraisal and Management Plan March 2016 extract**


Aerial photography illustrating the impact of Industrial Solar South on the character and setting of Gayton located directly *adjacent* to the Village boundary and local homes, and in very close proximity to the historic Conservation Area.
Gayton and surrounding fields are located in a very prominent elevated position on high ground clearly visible from over 3km away on the rail line into Northampton
c.120m Gayton Conservation Area
Gayton Village Boundary

Gayton

CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN

Adopted March 2016

Gayton is a place of special character and historic interest. This appraisal and management plan sets out the features that contribute to its distinctiveness and identifies opportunities for its preservation and enhancement.

South Northamptonshire Council

9. Management Plan

3. Boundary walls

Boundary walls and strong boundary lines are a significant feature of Gayton Conservation Area. Any new boundaries should be constructed of suitable stone and be of an appropriate height and coursing to fit well with the existing walls.

Any new boundaries should be clearly delineated and be of an appropriate material and height. Any new or existing development that is set back from the highway should create strong boundary treatments to maintain and enhance the sense of enclosure and built form as seen across the conservation area.

Action 4:

Boundary walls which make a positive contribution to the character of the conservation area will be retained. New boundary treatments should fit with the character of existing boundaries.

Action 5:

Any new or existing development that is set back from the street should be encouraged to create strong boundary treatments to maintain a sense of enclosure.

4. Paving and surfacing

Opportunities should be taken to enhance areas of paving and kerbing where appropriate. Careful design and sensitive use of materials will be expected in any future resurfacing works of Gayton.

Action 6:

Encourage statutory undertakers to rationalise and remove unnecessary clutter within the conservation area and replace with appropriate solutions. Highways authorities should try to avoid the insertion of inappropriate kerbing and footpaths, which would have a harmful effect.

5. Open spaces

Open spaces play an important part in Gayton Conservation Area contributing to its historic and rural character. Opportunities should be taken to preserve and where appropriate enhance, the character and appearance of these spaces.

Action 7:

Promote the sympathetic management of open spaces, including verges and banks.

6. Renewable energy sources

Whilst the Council is supportive of the sustainable energy agenda it also recognises that many sources of renewable energy and micro-generation have the potential to harm the character and appearance of a conservation area. Care therefore needs to be taken to balance the needs of climate changes with the preservation of the historic environment.

Action 8:

Encourage the sympathetic location of solar panels, wind turbines etc to inconspicuous roofslopes and building elevations where they will not have a detrimental impact on the character of the conservation area.

7. Satellite antennas

Satellite and radio antennas are non-traditional features which have the potential to disfigure the appearance of traditional buildings. Care must be taken to ensure that they are located where they will not have an impact on the significance of heritage assets and the character and appearance of the conservation area.

Action 9:

Require the location of satellite antennas in inconspicuous sites to prevent harm to the historic character and visual appearance of the area.

9. Management Plan

8. Telegraph poles, lamp standards and overhead cables

The visual impact of overhead wires and telegraph poles has the potential to dominate and disfigure the character and appearance of the conservation area.

Action 10:

Encourage the undergrounding of cables and wires to reduce the visual impact caused by these on the historic streetscape.

9. Tree management

Conservation area designation affords protection to trees from unauthorised felling or lopping. They contribute to the scale and form across the village and promote the rural character of the settlement.

Action 11:

Large mature trees should be retained wherever possible in order to preserve the character of the conservation area.

10. Development affecting the setting of a conservation area

It is important that development around the conservation area does not harm the setting. Any development in or around Gayton which affects the setting of the conservation area should have regards to views in and out of it, the setting of positive buildings and the character of the landscape.

Action 12:

The impact of development on the character and appearance of the conservation area should be considered. This applies equally to development outside the conservation area if it is likely to affect the setting of the conservation area.

11. Protect archaeological remains

Gayton has been inhabited for many centuries and buried evidence of past occupation may survive in the village. Development proposals should take into account the potential for remains of archaeological interest. Professional advice should be sought and appropriate assessment undertaken.

Action 13:

Development which involves below-ground excavation must have regard to the potential remains of archaeological interest.

5. Negative Impact on Grand Union Canal Conservations Area

The Applicant claims that impact on the historic Grand Union Conservation Area is limited. In fact, the application north site directly abuts the Grand Union Canal Conservation Area for c.**1km** of the Conservation Area boundary. This is clearly identified in the South Northamptonshire Council Grand Union Canal Conservation Area Character Appraisal (see attached extract below).

The Grand Union Canal Conservation Area Plan has the objective to protect the surrounding countryside from any inappropriate new development which could adversely affect the setting of the Grand Union Canal. Clearly, being in such close proximity and of such massive scale, the 170-acre application sites will severely impact the Conservation Area with little ability to mitigate. Again, various photographs attached in Section 2 of this Objection Letter and attached below demonstrate this impact with views from the towpath and bridges within the Conservation Area directly into the proposed industrial solar north site.

Also, there is a rare Grade 2 Listed canal bridge ('Turnover Bridge 47') located within the Grand Union Conservation Area that directly overlooks, from an elevated position, a significant section of the proposed industrial solar north site.

Refer to WNC Policy –

- **EV1 (1), (2), (3) & (4)**
- **EV7**
- **EV10-V1**
- **EV11**

See below –

- **South Northamptonshire Council Grand Union Canal Conservation Area Character Appraisal and Management Plan extract**


Grade 2 Listed ‘Turnover’ Bridge in the Grand Union Conservation Area *adjacent* to Industrial Solar North

Grand Union Canal
Conservation Area
Character Appraisal and Management Plan

Adopted April 2014

South Northamptonshire Council

www.southnorthants.gov.uk

6. Character Areas

This chapter analyses the special interest of the Grand Union Canal Conservation Area by dividing it up into eight 'Character Areas', based on a careful assessment of each Area's unique features relating to landscape setting, building form, uses, and historical development. These Character Areas are considered to be:

Character Area 1:
Stowehill to Blisworth Junction

Character Area 2:
Northampton Arm

Character Area 3:
From Blisworth Junction to Blisworth

Character Area 4:
Blisworth Tunnel

Character Area 5:
Stoke Bruerne

Character Area 6:
Stoke Bruerne to Cosgrove

Character Area 7:
Cosgrove to the River Great Ouse

Character Area 8:
Old Stratford Arm

Each Character Area is described and its special features (both positive and negative) noted, under the following headings:

- Key positive features
- Location
- History
- Uses
- Landscape setting and views
- Listed buildings
- Other significant buildings and features
- Key negative features and issues

6.1 Character Area 1: Stowehill to Blisworth Junction

Key positive features

- The attractive landscape setting with mature trees and open fields
- Long views out across this countryside
- The gentle curves of the Canal through this landscape
- The wild flowers and wild birds
- The surviving listed and unlisted historic bridges
- The historic groups of Canal-side buildings and sites
- The activity provided by the narrowboats
- Parts of the Canal are very peaceful and have a remote character

Figure 66: *The Canal between Stowehill and Nether Heyford*

Location

This section of the Canal stretches through some six miles of open countryside in a south-easterly direction from just south of Weedon, where it passes under Watling Street (the modern A5) at Stowehill, to Blisworth Junction, where the Northampton Arm branches off. It passes close to, but not through, the villages of Nether Heyford, Bugbrooke and Gayton.

History

This part of the Canal was constructed in the last few years of the 18th century. The section from Braunston to Blisworth was begun in 1793 and completed by 1796. A brickworks was provided in Braunston in 1793 which supplied the whole length of the Canal. Within a short period of time, a variety of industries set up close to or on the Canal including the lime kilns at Blisworth which are shown on an illustration of 1819 – the Canal encouraged the burning of lime for agricultural fertilisers by bringing in coal to the kilns and carrying away the lime for distribution.

Uses

Although the Canal passes through a rural landscape in agricultural use, along the line of the Canal are working boatyards, various businesses associated with the Canal, modern marinas, public houses (two), working farms, and residential property; some of it located in converted warehouses or other Canal-related buildings. Of special note are the many narrow boats which use the Canal for recreational purposes with, at least in high summer, a fairly constant flow of boats in either direction. Of note are:

- The two public houses - The Narrowboat Public House at Stowehill, and The Wharf Inn, Bugbrooke, a much extended historic building which is now a very popular public house
- The small moorings at Stowehill including a boatyard (Stowehill Workshop) and Rugbyboats, selling logs and coal
- A further moorings, slightly larger, at High House Wharf, Stowehill
- A caravan club certified site for five pitches on the edge of the Canal at Whitehall Farm
- The various activities at High House Wharf, Nether Heyford including a boat painters and signwriters (Spiderworks)
- The very large Heyford Fields Marina, between Nether Heyford and Bugbrooke

Figure 67: *Canal-related commercial activities at Stowehill*

Landscape setting and views

The Canal follows the 90 metre contour for most of this route, often on an embankment which overlooks the valley of the River Nene to the north-east, with rising land above the Canal to the south and west, containing the views. There is a cutting at Bugbrooke where the land rises slightly. The landscape is mainly open, with long views to the north and east although in the summer these are contained by the thick hawthorn hedge which lines most of the towpath which in this part of the Canal runs along the north and eastern sides. Of note are the various footpaths which lead off the adjoining fields from the towpath, which for most of this length is a simple earth-beaten grassy footway.

To the south and west, the opportunities for views are more varied, as sometimes they are prevented by large groups of trees. In some places along this side, the fields come right down to the edge of the Canal without any physical boundaries, so there are very pleasant longer views over the fields which in this section are mainly used for growing crops. The site of the former Bugbrooke Gas Works lies to the north of Bridge No 35 (Elliott's Bridge), but the buildings have been demolished and no evidence of their past presence remains.

Listed buildings (all grade II)

Full descriptions are included in Appendix 2.

- Bridge No 27
- Simon's Cottage, Nether Heyford
- Bridge No 33
- Bridge No 42
- Bridge No 43
- Bridge No 45
- Bridge No 47 – the 'turnover' bridge where horses could change from one side of the Canal to another
- Milepost, junction of the Grand Union Canal and the Northampton Arm

Figure 58: *Bridge No 27 at Flore Lane Wharf*

Figure 69: *Detail of the Turnover Bridge (Bridge No 47)*

Other significant buildings and features (from north to south)

- The Narrowboat Public House, Stowehill
- Sluices at Bridge No 27
- Whitehall Farm Barn, Stowehill, with its 'stripy' stone elevations
- High House Wharf, Nether Heyford, which still retains its character as a 19th century working wharf
- Swingbridge House, Nether Heyford, and the remains nearby of the old abutments to the bridge (now gone)

6. Undermining of Local Tenant Farm Businesses and Employment

The numerous fields that would be lost under the industrial solar installations have been successfully farmed for many generations by long standing local tenant farming families. Losing nearly 170 acres of productive, good quality, food producing arable land will significantly undermine these businesses and negatively impact a swathe of local employment. The loss of land impact on just one of the tenant farmers would represent a c.25% reduction in their available land for crop production, creating critical viability issues for their business. This at time when the farming industry nationally is struggling, yet now more than ever is vitally important to the UK.

It should be noted that this impact goes much further than just the actual tenant farm businesses that will lose the land. As noted in Section 1 of this Objection Letter, many other local SME's, employers and larger businesses rely on farm contracts with these local tenant farmers to support and grow their operations. For example, as was the case in 2021, Heygates of Bugbrooke regularly receive significant tonnages of corn harvested on the fields that will be lost with this proposal. There are often suggestions in industrial solar proposals of the 'green-washing' offer of sheep grazing around the sites to 'help' or somehow justify the loss of vital arable land. In reality, the truth is that on a normal field, farmers would hope to achieve sheep grazing densities in excess of 15 sheep per acre whereas the limited, poor quality grass under and around solar installations barely achieve a single sheep per acre. This 'fig-leaf' offer is practically worthless from a farming business perspective, especially when compared with the above average crop yields currently being achieved.

No mitigation is offered by the Applicant for this impact. If industrial solar schemes of this massive scale are consented and built on productive arable land, that supports both local rural employment and local community businesses, whilst producing significantly above average crop tonnages, then there will be a spiral of depredation in rural areas on a local level, coupled with a growing national crisis around increased reliance on international food markets. Ultimately, this will weaken the UK economy and leave the nation far more exposed to external food supply trade pressures and threats.

Refer to WNC Policy –

- **E7**

7. Impact on Local Tourist Businesses

The locations of the industrial solar installations will directly impact important local tourist businesses and employers, just as they struggle to recover from the Covid pandemic. Gayton Marina, a successful marina and canal boat holiday operator, and the Limes Caravan Club Camping Site are located directly adjacent to the application sites and Blisworth Marina is just to the east. These are long-standing successful local businesses, employing many local staff.

The scale and location of the proposals will effectively industrialise the area, changing it irrevocably from Northamptonshire open countryside, ideal for agriculture, wildlife and leisure pursuits. The sites either border, or are crossed by, over **3km** of narrow public countryside highways, public footpaths and canal towpaths. The aspect and character of these leisure areas, used by many local people and visitors to the area, will be dramatically negatively impacted with the industrial installations immediately visible, detracting from the enjoyment and considerable value for the wider community that the area currently provides.

This undoubtedly will hamper the continued success and future potential of these local tourist businesses by substantially changing the environment in which they currently operate and deterring general outdoor leisure pursuits. This is contrary to many WNC objectives where general adopted policy has been to support local rural businesses, employers and tourism to ensure local employment opportunities are encouraged and improved wherever possible.

Refer to WNC Policy –

- **RC7 – (7.25)**

8. Noise Generation

There is considerable available evidence to confirm that industrial solar installations, on the massive scale proposed, generate continuous noise. The Applicant makes vague reference to this but does not provide statements with conclusive support. Bearing in mind the extremely close proximity to Gayton, with the proposed location abutting the actual Village boundary and being directly adjacent to many local Village homes, Gayton Parish Council are surprised that such limited information is provided.

Before any application can be considered a detailed noise survey should be carried out to understand the potential disturbance to both the general local environment and local homes and gardens. This must be carried out to ensure differing weather conditions are covered, with the prevailing wind regularly changing around the high ground of Gayton such that background noise levels often differ considerably day to day. The survey should not be selective but should cover all scenarios and weather conditions.

9. Cumulative Development Impact

In the submissions previously made by the Applicant, in attempting to avoid the requirement for EIA, it is stated that the industrial solar scheme would have no cumulative impact. In fact, there are many new warehouse developments now under construction or operating along the M1 corridor between J15 and J16.

What Gayton Parish Council and many residents, not just in Gayton but also other villages throughout South Northamptonshire, find disappointing and short sighted is that few of these new developments seem to have any planning obligations, secured via S106 or condition, to incorporate meaningful elements of renewable energy generation. These sites represent ideal opportunities, with many thousands of square meters of roof, yard and parking areas that could accommodate solar panels. It does not seem sensible that we are complementing losing significant tracts of good productive arable land and negatively impacting local rural employment when these alternative, far greener solutions are available. This growing wider UK issue of serious concern has also been identified by a number of national institutions including the CPRE who recently highlighted the problem (and missed opportunity) in their recent November 2021 East Midlands Newsletter (see attached extract below).

It is stated policy for WNC to require new industrial buildings to utilise roof space for solar. This is where this proposal should be situated – not on productive farmland. No doubt claims by developers that this is 'not viable' will be made, but the evidence is readily available. Significantly uplifted land values are being achieved for industrial land compared with arable land prices and solar site rents are considerably in excess of arable rents. The land profit margin being achieved by the underlying landowners, land promoters and developers would go a long way to covering the costs of combining solar installations within built industrial space. Perhaps this should be enforced policy in a similar way to CIL or affordable housing provision requirements are applied to residential development planning.

Refer to WNC JCS Policy –

- **S10**

Whose tune are we dancing to in the new normal?

- Geoff Carverhill

As Northamptonshire emerges from a state of lockdown to varying levels of 'new normal', how many times have you heard the comment, or said to yourself, "When did that get built?" or "That wasn't there a year ago!". The fact is that while we were all locked away in our homes watching re-runs of Foyle's War or The Durrells, the construction industry was very busy indeed.

Boris Johnson's Build Back Better campaign has already opened the door to rapid and unchecked development in Northamptonshire, such as the vast M1 junction 15 warehouse developments and new housing estates where the developers have reneged on affordable housing, resulting in the loss of farmland, woodland, hedgerows and grassland. We are in a part of the country that relies solely on trees and hedgerows for carbon sequestration. Unlike the Highlands of Scotland, we don't have peat bogs!

I came to live and work in Northamptonshire forty-two years ago, to escape the dull suburban backdrop of West London. Fortunately, my father had instilled in me an appreciation and respect for the countryside and, being a keen cyclist, I was immediately taken with Northamptonshire's abundant and balanced rural character. Four decades on, however, the rural profile of the county is in crisis and under threat. As a new member to CPRE and a technical secretary for the South Northants area, I am constantly asking myself who is the beneficiary of all this development?

The simple answer is: developers, operators, shareholders and landowners. What about the people of Northamptonshire? In an area where we are witnessing more and more development of warehouse and distribution sites, due to the logistically advantageous central position of Northampton and the M1, are we in danger of becoming 'Shed County'. Have we gone a shed too far? According to the 2011 NOMIS census figures, only four per cent of the working population of South Northants actually work in the logistics industry.

All of these developments are in addition to that other, to quote a journalist colleague, "monument to greed and corruption" – HS2. This project, hastened by Boris Johnson and his ministerial cohorts, while we were in lockdown, will ruin parts of Northamptonshire, if the experience of farmers, landowners and villagers of Buckinghamshire is anything to go by.

Currently, CPRE Northamptonshire is monitoring several planning applications and consultations: a one million square foot warehouse complex for the logistics company DHL in Towcester and a hybrid planning application for a similar warehouse and fuel station complex adjacent to it. If granted they will cause significant environmental impact and visual intrusion to the adjacent village of Caldecote. CPRE Northamptonshire has stated in its response that it should be recommended for refusal. A vast proposed solar farm at Halse and one at Greatworth have also been recommended for refusal. These sites, which, as well as ruining areas of valuable farmland, would not be needed if warehouse developers were obliged, through planning legislation, to place solar panels on the roofs of warehouses. Other proposed developments that are under scrutiny are several large housing applications around villages in South Northants, all of which are outside village confines ... the list goes on.

We need to act quickly, by reinforcing both CPRE Northamptonshire and CPRE's national campaigns, to get Boris Johnson to keep his promise to build back better on *brownfield sites*, whether it be housing or warehousing.

A personal look at the changing rural face of Northamptonshire

A small light at the end of the tunnel for Northamptonshire is the Joint Core Strategy that was approved in 2014. It is now being reviewed under West Northamptonshire Council, with an options consultation that started in October 2021, for the period 2021 to 2050. As CPRE is a principal consultee, this is an opportunity for us to make sure that any new local plan will meet the housing and economic needs of the people of Northamptonshire, rather than the needs of developers. It's a tall order, but now more than ever, we have to get right that delicate balance between urban and rural life.

It's not going to be easy, but it's not impossible either

10. Traffic Impact on Highway Network and Local Villages

The Transport Statement (document R01 Transport Statement 2021 06 24) submitted by the Applicant in support of their application significantly underestimates the number and scale of transport movements, impact upon the Village, and the road access issues pursuant to the proposed development. The access described goes against the Transport Policy of the County Structure Plan.

Traffic movements

The Applicant states that during the construction stage there will be 8 commercial vehicles a day delivering over 92,000 panels to the site. Over the 36-week construction period this equates to 2,880 16.5m 40 tonne articulated HGV movements in both directions alone. However, this estimate is misleading as it understates the case and only relates to the panel deliveries and does not include:-

- Construction workers
- Management team
- Heavy plant
- Waste removal vehicles
- Delivery vehicles bringing in ancillary materials such as cabling and battery components

We believe that this figure is a gross understatement of the actual number of HGV and commercial traffic accessing the site, a more realistic figure being in excess of 7,500 over the period of the construction (see table below).

Calculation of Industrial Solar HGV and Service Vehicle Movements

Industrial Solar Potential Traffic Movements			
Construction Period 36 weeks			
Vehicle type	Purpose	One way Movements per day	Total Movements
40 tonne HGV	Panel Delivery	8	2880
40 tonne HGV	Ancillary Deliveries of build materials	3	1080
Light Commercial	Construction workers (20 onsite per day @ 2 per vehicle	10	3600
Heavy Plant	Allowance at start and end plus during period of build		56
		Total Traffic Movements	7616

Traffic Safety

Access to the site has been stated as using the following route:-

- A5123 from the M1
- A5076 east
- Towcester road south
- Station road
- Blisworth Street
- Milton Road

The Transport Statement concludes that the above is the shortest practicable route to and from the site. This is supported by the Applicant's claim that '*in this context, the addition of up to 16 further movements per day for a temporary period would not be expected to be detrimental to road safety*'.

Gayton Parish Council strongly dispute this as it would appear that the route has been determined by map study, but not in person as the proposed route has a number of physical and public highways safety issues, especially when considering the true volume of potential traffic movements:-

- Access via Station Road – this requires articulated HGVs to negotiate an angled single lane humpbacked canal bridge
- Station Road to Blisworth Road – this is a single-track road with blind corners and no passing places, unsuitable for HGVs and used daily by horse riders and cyclists
- Station Road/Blisworth Road Crossroads – this is a notoriously difficult crossroads with limited visibility. There appears to be no swept path analysis of this junction
- Blisworth Road – accessing Blisworth Road into the Village involves a number of road sections that are effectively single carriageway (certainly for large commercial vehicles) and the narrow redundant railway bridge
- Gayton Village – all construction traffic would be required to pass through the village directly in front of residential properties with many parked vehicles to negotiate
- Gayton Conservation area – all vehicles would be required to pass through the Conservation Area and within 30 metres of Gayton Parish Church, a point of historical interest
- Blisworth Road to Milton Road – the access to Milton Road is often difficult to negotiate for normal traffic due to the 90-degree aspect to the corner and parked vehicles attending the church, it would therefore be highly unsuitable for multiple HGV movements a day. Again, there is no swept path analysis
- Milton Road bridges – the railway bridge on Milton Road is single carriageway access and the Grade 2 Listed canal bridge is also single carriageway and weight restricted. To cross the listed bridge, HGV loads will need to split down meaning double-handling of loads and therefore significantly increasing the actual vehicle movements predicted

We would therefore conclude that whilst the construction period could be argued as short term, the proposed route is neither practical nor safe – see photographs below identified the Applicant's proposed HGV route.

Photographs of Proposed Route

Vehicle access over bridge on Station Road

Station Road to Blisworth Road showing a single-track road with blind corners and no passing places

Station Road / Blisworth Road Crossroads – impossible for HGV's to negotiate without crossing full width of lanes

Gayton Village showing residential parked vehicles approaching Milton Road in Conservation Area

Blisworth Road to Milton Road Corner is a 90 degree blind corner

11. Temporary Planning Use with Undefined Reinstatement

We note the term 'temporary' that the Applicant has stated with this application. We find the definition of 'temporary' to be a little strained in this instance at 40 years. If this use is to be genuinely temporary then an approved plan is required to be included in the application that sets out decommissioning, removal and safe disposal of the installations and the reinstatement of the site back to productive arable use. Our concerns centre on the highly toxic compounds that are used in panel manufacture and the serious problems now arising all over the world of redundant panel disposal, with many millions of tonnes being reported going to landfill.

WNC should also be challenging the Applicant's claims to fully understand the true lifecycle analysis of industrial solar. At point of generation, solar panels represent a low carbon source of energy generation. However, this does not at all represent the carbon emissions and toxic risk of the whole lifecycle of industrial solar installations. Life Cycle Analysis (LCA) is a tool to measure the environmental impact of a project throughout its full lifecycle. From the resources used in manufacture, to final disposal. This includes energy used in the production of the solar panels, the raw materials required for manufacture, transport, construction, and final safe disposal. Therefore, point of use generation maybe low carbon, but Gayton Parish Council would wish to understand the full environmental cost of the project. It is certainly not enough to simply say 'solar is a clean source of energy'. We would wish to see the full LCA for the project underpinned by a solid evidence base. We also need to see evidence that there is no other chemical, biological or environmental impact across the full lifecycle of the project and the technology used.

On a related issue, we understand that the Climate Change Committee's Sixth Carbon Budget recommendations to Central Government identified that the majority of clean energy demand 2019-2050 will be provided by offshore wind and therefore we would like to understand how the Applicant's plans have factored in how this scheme plays into the wider UK energy system. We would also like to understand if the 54MWh quoted by the Applicant in their EIA screening request is generating capacity on installation capacity and would like to see the calculations of CO2 emissions per annum.

In light of all the above, we are concerned regarding which responsible entity is likely to be around in 40-years time, to carry decommissioning, removal and safe disposal. We do not claim to know how industrial solar businesses operate, but we have noticed that a number of solar sites are often owned and run by subsidiary limited company single purpose vehicles (SPVs). Our concern is that this could create a situation where these SPVs either fail (and therefore don't exist in the future) or do not have the funds available to safely remove the installations when they have either ceased to function, been damaged or energy generation systems has moved on from solar, leaving the redundant installations in-situ with an increased major contamination risk for the local area and wider groundwater catchment.

Perhaps an approved costed plan for decommissioning, clean-up and reinstatement with sufficient funds provided by the Applicant now and held in an escrow account, under the control of WNC, should be a condition of any planning permission or captured within a S106 agreement. This problem of contamination risk and safe decommissioning of industrial solar is a major developing worldwide issue and, coupled with actually obtaining a better understanding of the true carbon footprint of solar panel manufacture, transportation, installation and use, we feel requires far more interrogation than is available in the 'justification' provided within this application.