

Gaydon Parish Council Response to Application no. 22/03361/FUL – JLR Solar Array

Summary

Gaydon Parish Council wants Jaguar Land Rover (JLR) to be a successful volume car manufacturer. We applaud the intent of JLR to achieve net zero and recognise that developing a solar array to reduce its carbon emissions via solar power can be a valuable component of that drive. We have a similar net zero ambition for the village of Gaydon, the location for the headquarters for JLR.

This planning application is exceptional in scale. It would be the largest private solar array in the UK, with all of its power output for the exclusive use of JLR in its operations. JLR has chosen a site for the array which does not yet pass the test of being demonstrably the best. In particular, JLR's peer group, when faced with the same challenge of building what amounts to industrial power plants for their own exclusive use have chosen to place their solar arrays on their own core site. JLR have yet to demonstrate with the requisite certainty that these same options would not be applicable for them, despite having a site with enough land to easily accommodate a solar array of 28 Ha. many times over.

We find the Sequential Test carried out as part of the planning application to be lacking a comparison to JLR's peer group of car manufacturers, let alone wider UK industry. Also, the depth of the due diligence is less than we would expect for such a vital comparison of options for siting the solar array.

To conclude beyond doubt that the proposed greenfield site, within 200 metres of the rural village of Gaydon is the best site will require an exceptionally robust test, to match the exceptional nature of the development. This application does not achieve that benchmark. An exceptional test is all the more necessary when taking into account the fact that the solar array will eliminate 28 Ha. of productive arable agricultural land, a site which dwarfs the 21 Ha. village of Gaydon. It must also be remembered that there is an asymmetry and an opportunity cost for the wider community: if JLR use this land for their own solar array, the village of Gaydon is prevented from using this land for over 40 years for other purposes. The local community does not have the option to site an array on JLR's core land as an alternative; JLR do.

We request That JLR carries out a much more robust Sequential Test, one that meets the criteria of exceptionality that we believe pertains here.

Despite our repeated requests, JLR have been unable to provide any demonstrable benefit to the village of Gaydon, whilst simultaneously depriving the residents of Gaydon from achieving our own potential vision for a sustainable future for the village by dint of using a highly valuable greenfield site immediately adjacent to the village of Gaydon. The site under consideration is an attractive tract of land, adjacent to our village, which could be used for a variety of alternative potentially innovative rural schemes, for example an imaginative blend of agriculture and solar farm, an agrivoltaic project, the synergistic combination of lower intensity renewables with arable agriculture, which has a much higher biodiversity gain than this application for the benefit of the village and of the wider community.

We hope that Stratford District Council will support the needs of Gaydon's residents for a sustainable energy future and oblige JLR to find ways to site this array on alternative land, especially on their own existing core site.

If, after exhaustively excluding any other options to JLR's and SDC's satisfaction, then Gaydon Parish Council would enter in good faith with a fall-back option, where we ask that Stratford District Council brings JLR and representatives of Gaydon Parish Council together, to help find a win/win that will allow this site to be developed for the mutual benefit of JLR and the village community of Gaydon.

Fit with Stratford District Council Core Strategy

The Core Strategy sets out the District Council's development strategy and planning policies. Core Strategy policy CS.3 is particularly relevant to the proposed development since it relates to Sustainable Energy. The Council's Renewable Energy Landscape Sensitivity Assessment is also relevant when interpreting and implementing the Core Strategy policies.

There is no doubt that the provision of renewable energy schemes is hugely environmentally important. However, it is equally important that the provision is not at the unnecessary expense of agricultural activity, biodiversity, landscape character and visual amenity. The overall balance of outcomes from such schemes should be positive for local communities as per Core Strategy policy CS.3.

The proposed development relates to a very large solar array for private use by JLR on a site covering approx. 28 hectares of undulating arable farmland with boundary hedgerows and mature trees as well as species-rich neutral grassland and broadleaved plantation woodland. It is inevitable therefore that a significant amount of agriculture land will be lost, biodiversity will be impacted and landscape character will be altered. In addition, the local community does not appear set to benefit from the development.

The proposed development will result in a complete loss of approx. 28 hectares of grade 3 agricultural land. It must be considered whether the impact of this loss is acceptable under Core Strategy policy CS.3 when it appears possible to locate a solar array in alternative non-agricultural settings on JLR-owned land, e.g. in the form of solar carports.

As per Core Strategy policy CS.3, the overarching aim is that the overall balance of outcomes from renewable energy projects should be positive for local communities. JLR have considered the request from Gaydon Parish Council to 'donate' 1.5MW of energy to the village. However, this has not been considered viable and yet no alternative has been offered. As of yet, it does not appear that any positive effects will be felt locally, contrary to Core Strategy policy CS.3.

Gaydon Parish's Own Sustainability Needs

The Parish of Gaydon has been developing its own sustainability vision, and whilst still in draft form, this provides an important context in which to balance the needs of JLR for cheap solar power, with the needs of residents for this too and also our wider sustainability needs. People live in Gaydon because they have chosen to live in a green and pleasant rural village and overwhelmingly do not wish it to be urbanised or industrialised. They would most like greener areas around the village, more public footpaths and if possible a net zero village. The JLR Solar Array – their industrial power plant, for their own exclusive use, on a prospective site for such

a development, in very close proximity to our village, prevents us from achieving our sustainable future on one of the most prospective parcels of land adjoining the village.

Some summary points

- Gaydon has over 400 residents and covers approx. 21 Ha. It is therefore dwarfed by this industrial power plant/solar array.
- Gaydon wishes to find ways to achieve net zero, not an easy task given our high carbon footprint of 24.8t CO₂e p.a. per-household, exacerbated by our rural location, poor public transport links and largely energy inefficient housing. Indeed, if we look at our territorial carbon footprint, taking the M40 transit through our parish, we have a colossal carbon footprint of 161.9t CO₂e p.a. per-household, dominated by road transport of users on the motorway.
- We know that the land around Junction 12 is likely to be highly sought-after, being Stratford District's only motorway junction. We understand that the land will be under developmental pressure for commercial and residential purposes. We wish that future to be a demonstration of net zero in action. We believe that the village is potentially in a good position to be a demonstrator for how to transition to net zero in a car-owning age, if we can harness all the resources around the village in a co-ordinated, sustainable manner.
- As our residents wish to balance rural life and a sustainable future, we have identified an innovative approach to solar arrays "agrivoltaics", a relatively new approach that allows the co-siting of a solar farm and traditional agriculture. We have been in discussion with Cambridge University's Carbon13 climate technology unity, who have confirmed that this is possible. An example of such a scheme is shown below. Stratford District is in a good position to be a world leader in this field, with the Warwick Crop Centre in Wellesbourne a world leader on the science of crop management and Warwick University being similarly well-placed in engineering and manufacturing. We have identified that the site JLR wish to use for the solar array may be a good location for such a scheme, which would be more in keeping with the heritage and future of Gaydon. Should the JLR solar array go ahead, we would lose this option.



Public Consultation

We wish to put on public record our thanks to Una Sommerville, the lead planning consultant of Mabbett's, who has been outstanding in her efforts to inform the parish of the planned development. Una has listened carefully to points raised by residents and the Parish Council alike and documented our ideas and concerns thoroughly. Nevertheless, we have the following concerns on the public consultation.

- Several residents directly overlook this proposed solar array and they have not all been consulted nor do the visual perspectives take the views from their properties into account and these residents are very concerned on all aspects of the project. The lack of a visual perspective from some of the properties most affected means that the glint and glare survey is incomplete, as are some of other reports commissioned by the project.
- Despite repeated requests in writing by the Parish Council for a site access visit, and JLR's own site, so that we too can see the reasons for their statements in the Sequential Test, JLR have refused to consent to a visit to either site. We consider this refusal unreasonable. We wish to conduct a site visit to both see the greenfield site for ourselves and also to look at the views back to our village and to confirm the properties directly affected, so that we can ensure the residents in these properties are fully consulted.

Our request is for JLR to host a site visit and also to the sites rejected in the Sequential Test for the Parish Council and key Stratford District Council (SDC) personnel, so that we can understand and assess the potential sites for a solar array and thereby be better informed as to their suitability or otherwise.

Community Amenity

Gaydon Parish Council has worked tirelessly to engage with JLR and to keep looking for win/win ways to make this solar array scheme mutually beneficial to both JLR and local residents. Despite our best efforts, JLR's modus operandi has yet to be sufficiently collaborative. Rather, it has been to listen to us, to then develop their response in private and finally to tell us what their response is. For example, they asked what we wanted to make their project valuable to the village. We said 1.5MW of clean solar energy. Despite repeated requests for updates and engagement, they kept us at arm's length, telling the Parish Council that "they were working on it", which we appreciated, as this showed apparent good faith, but they provided us with no detail. Their next substantive communication with us on this subject was to tell us it could not be done and the reasons why not. At no stage was there an invitation for the Parish Council to sit down with JLR and to discuss their findings regarding the 1.5MW request and to then explore more creative options for a win/win.

JLR next asked Gaydon Parish Council what else we would like as a contribution instead of the 1.5MW of solar power. We have suggested that JLR might instead like to contribute to a Green Gaydon Fund, administered by the Parish Council and to be used exclusively for green and sustainable purposes in the village. We have given them examples of how the monies might be used e.g. for refurbishing the village hall to a higher energy standard, to provide LED streetlights, to provide grants for community sustainability projects in the village, inter alia. In December, JLR indicated that they would brief their senior management, and seek to potentially secure funds for this. We have yet to receive their invitation to do so or indeed to

be told the outcome of their discussions with senior management. We remain concerned that the process followed with our request for the 1.5MW will simply repeat itself and that will leave our residents with zero benefit and only downside arising for them from this scheme.

We recognise that it is in all parties' interests to find a positive way forward. We remain open at all times to sit down to discuss next steps with JLR.

If, after exhaustively excluding any other options to JLR's and SDC's satisfaction, then Gaydon Parish Council would enter in good faith with a fall-back option, where we ask that Stratford District Council brings JLR and representatives of Gaydon Parish Council together, to help find a win/win that will allow this site to be developed for the mutual benefit of JLR and the village community of Gaydon.

Sequential Test – Comparing Alternative Options And Their Consequences

We recognise that the use of a Sequential Test is much more established process for application to flood plain assessment, for example, than for solar farms and therefore may be subject to more iterations before reaching the same level of conclusiveness.

We have major concerns on the validity and robustness of the Sequential Test. The assessment criteria for this test do not take into account the loss of amenity to the local community of losing this greenfield land for other potential purposes. JLR has options to site this array on other land that they already own, including brownfield locations like car parks: the local community does not. This is not explicitly part of the assessment criteria and it should be. The lack of this factor leads to a skewed result and one that favours using up greenfield land, as this is always likely to be the cheapest route, and not in this case the most appropriate.

Other manufacturers in the UK car industry are many years ahead of JLR in their deployment of solar arrays, so there are existing comparable planning applications against which to compare the JLR Solar Array. Without exception, these other manufacturers, i.e. Nissan Sunderland, Bentley Crewe and Toyota have recognised that because their solar arrays are to meet their exclusive private industrial needs for power, they needed to find a way to accommodate the arrays on their own site, inside existing boundaries. JLR are therefore the outlier in seeking to build a solar array on greenfield, outside their existing site; especially one so close to housing.

We note that the timeline for completion of the Sequential Test lays it open to the claim of being less than fully objective. It was completed at the end of the process of developing the planning documents and this can too easily lead to being seen as a post-hoc rationalisation of a decision already taken on where to site the solar array, having already committed considerable money and time to the site for which planning is sought, vs. a truly objective and creative test to find a way to make it work on their current site.

Event	Estimated Date
JLR purchase land for potential solar array	2015
JLR commence informal discussions with Stratford District Council's Planning Department	Late 2021
JLR communicate the potential for a solar array on the land for which planning is now sought	Jan/Feb 2022
JLR present their solar array plans in detail to Gaydon Parish Council of the	June 2022
JLR complete Sequential Test	October 2022

Siting a Solar Array Inside JLR's Test Track

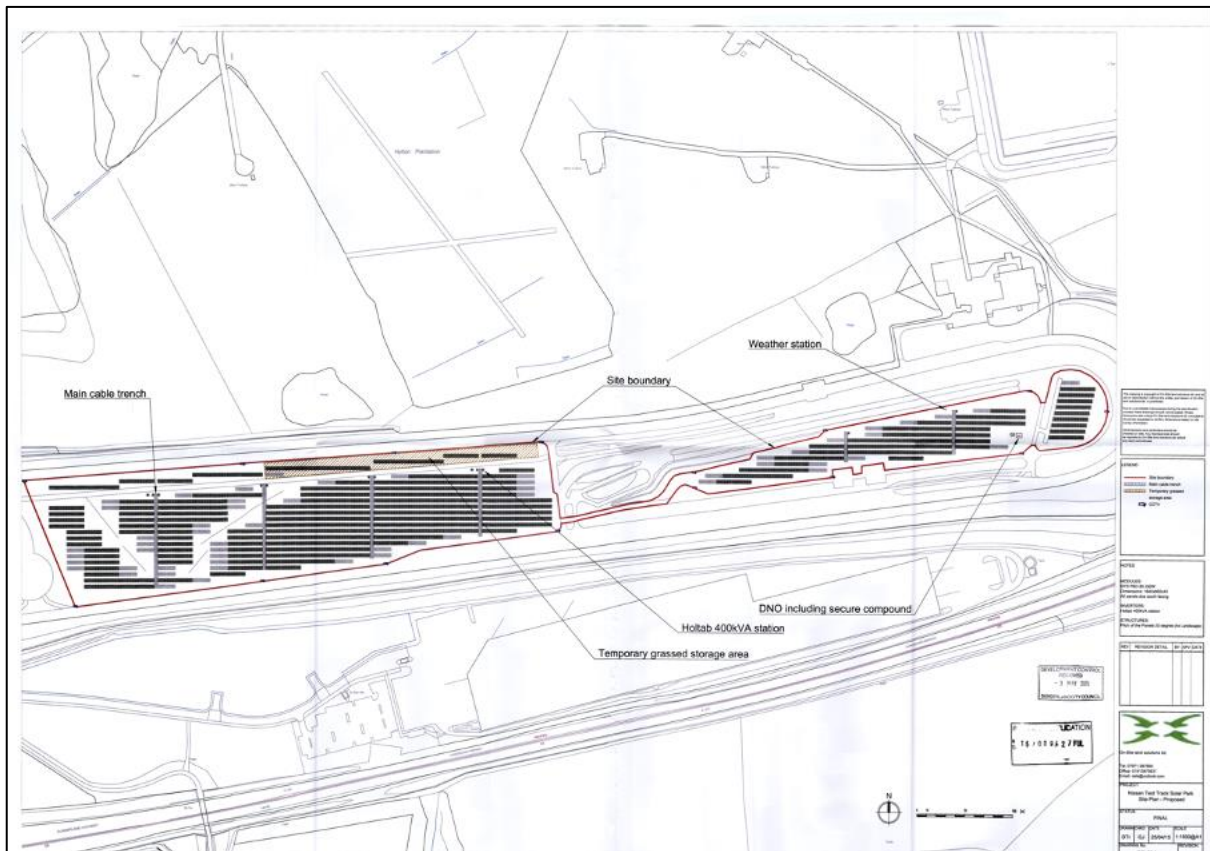
JLR dismiss the idea out of hand of installing the solar array inside their test track, citing a variety of major operational and cost issues that would be involved. They seem to convey the idea that the test track area is somehow not to be touched. Ever. The area inside the Gaydon test track is estimated at 33.7 Ha, comfortably enough to site the entire JLR solar array.

Anecdotally, we understand that new 4x4's have been parked inside the test track in the past, and that fully laden car transporters may have accessed the site via the so-called weak bridge. JLR has a second test track at Fen End and they therefore have other options for vehicle testing while the work is being carried out.

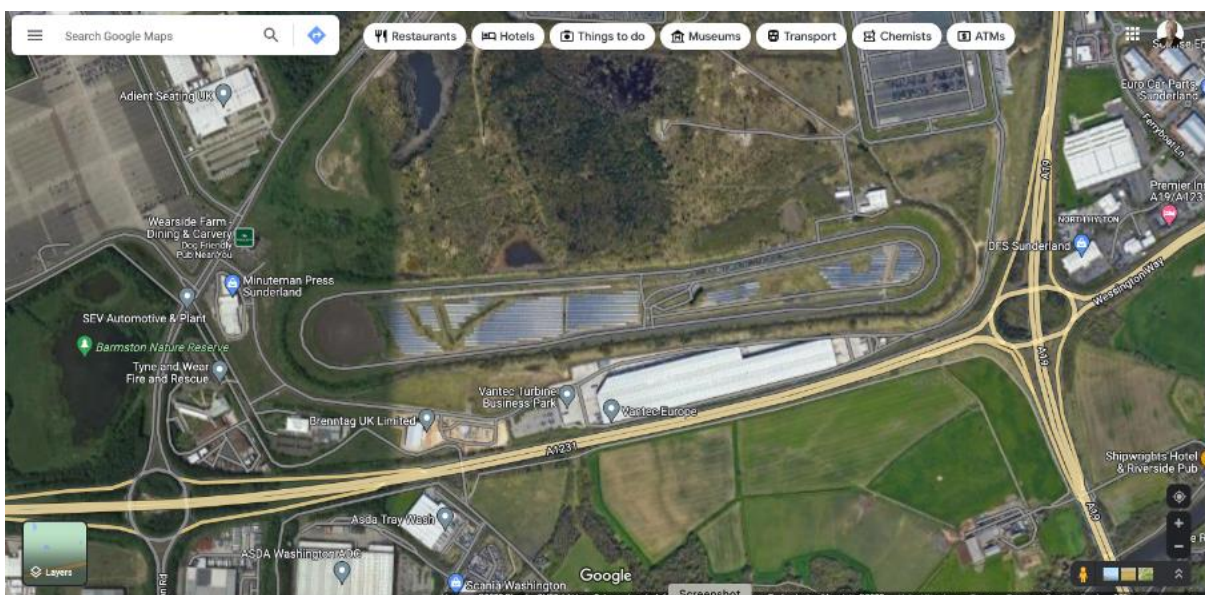
We note with interest that the first solar installation at Nissan Sunderland was a 4.75MW solar farm inside their test track in 2015. They must therefore have overcome any operational, health and safety concerns. The URL for the Nissan planning application is here:

<https://online-applications.sunderland.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NNRKITBB85000>

Nissan Test Track Solar Farm –Site Layout (taken from their planning documents)



The following image is taken from Google Maps on 10/12/22 and shows the Nissan Solar Array sited inside their test track and operational today.



Indeed, unlike JLR, Nissan concluded that this installation is perfectly compatible with the test track's operations. The following quotation is taken verbatim from the Nissan planning application Planning Statement/Overview, comment 6:

"The use of the Site as a solar PV array will allow continued use of the Nissan Test Track for the duration of its operational lifetime."

JLR appear not to have the same attitude to finding ways to make this work on their own site.

One further specific that we note is JLR's statement that they would need HGV access over a weight-limited bridge, in order to gain delivery access to a potential test track location. This therefore precludes the delivery to a site of the solar panels. Nissan found a way to address this by having HGV's deliver to a storage compound just outside of their test track and then using smaller vehicles to take panels from there onto the site for site assembly. (See Nissan planning document: transport information 723210.pdf in their planning application). This is not a ground-breaking concept to manage the logistics of delivering to such a site, in fact it is standard practice and obvious. We do not understand why it has not even been considered an option.

Our questions are then:

- 1. "If it was technically, operationally and commercially feasible for Nissan to build their solar array inside their test track in 2015, when solar panels were much more expensive than in 2022, why can't JLR find a way?"**
- 2. "Why did JLR so comprehensively dismiss the option of installing a solar array inside their test track, when there is plenty of land available, when there is precedent in building such a scheme from Nissan Sunderland, and why did JLR not find a way to manage this delivery access to a test track location when an obvious option is available?"**

Our request is: "Can JLR please seriously look at this option of installing the entire solar array inside their test track and carry-out robust due diligence this time that will satisfy us that they have tried hard and creatively to find a solution, and are not merely justifying a pre-selected choice, i.e. their greenfield solar array application"

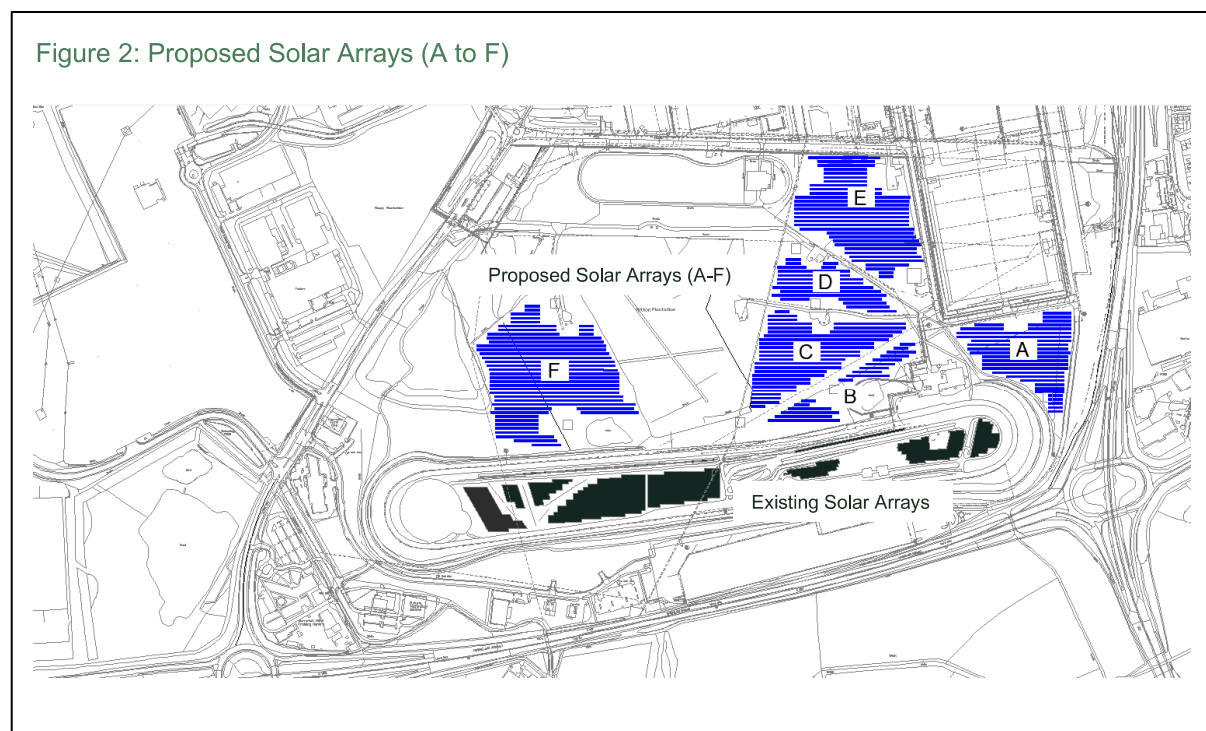
Other Options For Siting Solar Arrays on JLR's own site

Nissan have recently received planning consent for a large private solar farm, some 20MW. See The Sunderland City application 21/02381/FUL. URL:

<https://online-applications.sunderland.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=R0NZV4BBIVH00>

This is wholly inside their own site, as one would expect for a private industrial power plant like this. We note JLR's dismissal of any options that the split the array into smaller, dispersed sites within their premises. The Nissan solar farm, as shown the figure below, taken from their own planning documentation, has the solar array spread across 6 non-contiguous blocks. We expect JLR to consider such options on their own site and thereby find options to site some or all of it on their own core site, before concluding their entire solar array has to be in a contiguous block, and especially before concluding that it simply has to be on the site under consideration in their planning application.

Nissan Sunderland 20MW Solar Array (in blue), also showing the existing array inside their test track (in black).



Siting Solar Arrays Over JLR Car Parks – Solar Car Ports

We understand that JLR has 19 hectares of car park which would be far more suitable from an overall sustainability perspective.

The Sequential Test report dated October 2022 also cites costs and construction methods as barriers for solar carports at JLR. However, it is noted that other UK-based car manufacturers have successfully managed to avoid solar development of greenfield sites. For example, Bentley in Cheshire have installed a solar carport and Toyota in Derbyshire have redeveloped industrial land for solar use.

Again, JLR are out of line with their peer group and the direction of travel on solar panels across the world, when it comes to placing solar panels over their car park. JLR cite excess cost and interruptions to operations as core objections. We are concerned that this seems to show JLR wanting the current application to go ahead, versus an objective and committed review of the options for solar power sited on JLR Gaydon's car parks: so-called solar car ports.

By way of comparison with their peers, in 2019 Bentley at Crewe finished installing solar panels over their car parks. The following quotation is taken from, FlexiSolar, the company responsible for the project.

"FlexiSolar, the innovative solar carport specialist based near Cambridge, is delighted to have constructed the UK's largest ever solar carport, which is now fully installed and being utilised at the headquarters of Bentley Motors in Crewe."

The large-scale solar carport consists of 10,000 solar panels, which have a capacity of 2.7MW, cover 1,378 car parking spaces and an area of 16,426m².”

This application is Cheshire East planning Reference Number 16/4268N “Installation of solar panels on a dedicated car ports situated on existing car park”. Decision date: 24/11/2016

<https://planning.cheshireeast.gov.uk/applicationdetails.aspx?pr=16/4268N&row=77&query=ab64a3f80e124b5ba4a1aa4d62ce804d&from=i>

The following image shows the project, which Bentley now claims is the UK’s largest ever solar-powered car port.

Bentley Crewe Solar Car Port



Source: <https://www.euronews.com/green/2019/05/02/bentley-builds-largest-solar-powered-car-port-uk>

It is noted from the applicant’s DAS dated October 2022, that the solar car ports were dismissed on the basis of “disturbance and loss of much needed car parking spaces”. Is this sufficient justification considering agricultural land (and the rest) is at stake? JLR appear not be operating at full on-site capacity following the pandemic and subsequent popularity of remote working. The reduction in rush-hour traffic on local roads would appear to support this. We understand that they currently have around 4000 staff on site so disruption would be minimal because of the number of parking spaces. They even have signage they can 'wheel out' telling staff which car park to access, as part of how this can be made to work and overcome operational issues.

Our questions are then:

1. “If it was technically, operationally and commercially feasible for Bentley to build a cost-effective solar array over their car park back in 2016, when photovoltaics were much more expensive, why can’t JLR find a way in 2022?”
2. “Why did JLR so comprehensively dismiss the option of installing solar arrays over their car parks, when there are many precedents for doing so, as exemplified by Bentley in Crewe and numerous other such installations in the world? This option will at the very least diminish the greenfield land requirement elsewhere for siting their solar array.
3. “Why did JLR not conclude that it could site at least part of the planned solar array as a solar carport, thereby reducing the area of greenfield agricultural land required?”

Our request is: “Can JLR please conduct a detailed engineering study to look at this option of solar carports, as at least a solution for a proportion of their solar array needs and carry-out robust due diligence this time that will satisfy us that they have tried creatively to find a solution, and are not merely justifying a pre-selected choice, i.e. their greenfield solar array application? ”

Siting Solar Arrays On JLR Rooves

Bentley Crewe also have solar cells on their factory roof, having already installed a substantial 20,815 solar panels over a large surface of their factory roof in 2013 and produce 5MW of power from the array.

Bentley Crewe Solar Array on Their Factory Roof

Source: <https://www.autoevolution.com/news/bentley-goes-green-with-largest-solar-panel-system-in-uk-57089.html>

This development is available for viewing on the Cheshire East Planning Portal, which features a number of solar arrays, which did not require detailed planning permission. See for example, application Reference Number 22/1494N, whose URL is here.

<https://planning.cheshireeast.gov.uk/applicationdetails.aspx?pr=22/1494N&row=6&query=ab64a3f80e124b5ba4a1aa4d62ce804d&from=i>

Bentley's headquarters in Crewe now cumulatively generate 7.7 megawatts of solar energy.

Our questions are then:

1. **"If it was technically, operationally and commercially feasible for Bentley to build a cost-effective solar array over their factory, which was itself built in 1940, why can't JLR find a way?"**
2. **"Why did JLR so comprehensively dismiss the option of installing solar arrays on their large and existing buildings' rooves, when there are many precedents for doing so, as exemplified by Bentley in Crewe, not to mention thousands of similar installations around the world?"**

Our request is: "Can JLR please conduct a detailed engineering assessment to look at these other options of solar arrays on rooves and carry-out robust due diligence this time that will satisfy us that they have tried creatively to find a solution, and are not merely justifying a pre-selected choice, i.e. their greenfield solar array application? "

Siting solar arrays on other parcels of Land

JLR have also identified other parcels of land within their site and another greenfield site towards Lighthorne. Again, these other sites are simply dismissed as being inferior to the Gaydon greenfield site. We find the evidence for this presumption lacking in detailed justification. Also, land adjacent to the site earmarked for JLR industrial use in the Core Strategy would surely be more suitable from a sustainability perspective than farmland.

Our questions are then:

1. **"Why did JLR so comprehensively dismiss these other options of installing solar arrays on other parcels of land?"**
2. **"Why do JLR so comprehensively dismiss the idea that the array could be split amongst different parcels of land on their site?"**

Our request is: "Can JLR please look again at these other options of siting solar arrays on their other land and carry-out a more robust due diligence this time that will satisfy us that they have tried creatively to find a solution, and are not merely justifying a pre-selected choice, i.e. their greenfield solar array application? "

Taken as a whole, in comparing JLR's Sequential Test with other UK motor manufacturers, let alone wider international comparisons, against which it would fare even more badly, it is hard to conclude that the Sequential Test is remotely fit for purpose given the ground-breaking nature of this development, the largest UK private solar farm, allied with JLR's desire to site it so close to a rural village. It needs much more detailed work to convince us that they have carried out the requisite due diligence commensurate with swallowing up the planned arable land associated with their planning application with glass and steel vs. building it on the JLR core site.

Biodiversity

It is noted from the Ecology reports dated March 2021, September 2021 and December 2022 that the applicant believes the proposed development will result in a net gain of biodiversity. This appears to be due to the newly created grassland that will be sown under and around

the solar arrays. However, the report itself notes that it will take 15 years before this grassland reaches its target condition. So, does this mean it will be 15 years before there is any real net biodiversity gain? The calculation of the supposed gain also appears to fail to take into account the risk to legally protected great crested newts, important nesting birds and deer as well as temporary/permanent damage to grassland and broadleaved plantation woodland during cable installation.

The report of a biodiversity gain therefore seems misleading, at least for almost one half of the solar array's existence (understood to be up to 40 years). Thus, we must question whether the impact on biodiversity has been made acceptable in accordance with Core Strategy policy CS.3.

In addition to the retention and protection of existing hedgerows and trees and the proposed additional hedgerow and grassland planting, JLR should extend the proposal to include the supposed existing Ecological Enhancement Area and attend to some much-needed ecological improvement of this area to help offset the adverse biodiversity impact of the development. This land is under JLR ownership and located directly to the south of the proposed development site. There should also be a condition that JLR is fully accountable for protecting and maintaining the ecological areas, trees and hedgerows etc. for the full duration of the solar array's existence so as to ensure their commitment to biodiversity enhancement is fulfilled long term.

We have a particular concern on JLR's ability to deliver on commitments of biodiversity. The bunds put in place to shield Gaydon from a previous development to the north of the village were left in a very poor state. The contractor simply dumped subsoil into a heap. This resulted in an eyesore, which continues to this day. There is minimal new growth on this bund, as there is no organic content to the surface soil and instead we are left with a scar on our landscape of bare subsoil. The promised biodiversity has not been delivered as it can gain no foothold on the land. We wish to see this rectified.

Our request is: "Can any application for a solar array for JLR please be subject to 2 stringent conditions. Namely:

- 1. JLR is made fully accountable for protecting and maintaining the ecological areas, trees and hedgerows etc. for the full duration of the solar array's existence so as to ensure their commitment to biodiversity enhancement is fulfilled long term.**
- 2. That as an additional condition, that JLR is obligated to fix the existing bunding to the north of Gaydon be finished-off properly with good quality topsoil and that good quality hedging and mature trees be planted to achieve the desired ecological enhancement."**

Landscape character and visual amenity

As per the Council's Renewable Energy Landscape Sensitivity Study, the proposed development is classed as a "very-large" development since it will cover an area greater than 25 ha. The size of a solar development becomes relevant when considering the sensitivity of the landscape to accommodate such schemes. In their Planning Statement dated October 2022, the applicant states that the proposed development is located in the Feldon Lias Uplands(?) but it is our understanding from the Council's study that the development site is in the Feldon Parklands. In the Feldon Parklands, the landscape is considered to have a high

sensitivity to very large solar developments, not the high/medium sensitivity that the applicant describes.

As pointed out by the applicant, the Council's study notes (in the context of the Feldon Parklands) that "The Jaguar Land Rover engineering centre and vehicle proving grounds at Gaydon lies on the plateau, screened by tree belts. Solar energy development within these tree belts may be appropriate". The study concludes that "The vehicle proving ground and flat areas directly to the north may be the only appropriate areas for large scale development" (*emphasis added*).

The proposed development is not located in the area considered to be possibly the only one appropriate for large scale development. Rather, it is located on undulating farmland to the south of the proving grounds and outside of the dense belt of coniferous trees.

There is therefore no substantial tree belt separating and screening the development from the village, and in particular from the closest residential properties. Thus, it must be considered whether the impact on the character of the landscape and on visual amenity is acceptable. Again, improvement of the existing Ecological Enhancement Area would go some way to help offset the adverse landscape impacts.

Gaydon Parish Council's position is that any development of land around the village must preserve the rural nature of the settlement. This will help to ensure that residents are not overwhelmed by commercial buildings and by its attendant light pollution. We need commitments from any developer to build a buffer of bands of mature trees around their developments.

Our request is: "Can JLR please include a mature tree buffer around the solar array site as part of its formal commitment."

Agricultural land

We note that the soil on the proposed solar array was tested by a company specialising in the assessment of contaminated land. Little comment was given to the agricultural productivity of this land and the loss of agricultural production.

The owners of Gaydon Farm, AMTEC, who own the fields directly adjoining the solar array land and have generations of experience of farming here have been asked to give their professional opinion of their land at Gaydon. They have given us permission to give this direct quotation and would be happy to be further consulted on the viability of the land under the proposed solar array for other arable agricultural purposes:

"We farm the land on both sides of the Kineton Road. The soil is grade 3 and is a slowly permeable, slightly acid but base-rich loam and clay soil. It is excellent soil for arable crop production having yielded on occasion more than 4.5 tonnes per acre of wheat. We have successfully grown winter and spring wheat, winter and spring oil seed rape, beans and barley as well as high quality hay for horses. The clay content gives excellent water holding properties which has meant consistently high yields in all crops even in drought years."

The loss of arable agriculture would therefore mean the potential loss of ca. 126 tonnes of wheat each year. Can the UK afford to lose this productivity at a time of high food price inflation?

Construction

We note the following on the construction phase proposed by the project team and request that they are fully addressed before this application can be considered fit for purpose.

- **Construction hours.** We object to the request for construction operations from 9-6pm. This is an unwanted intrusion on our residents' quality of life, all the more so given the very close proximity of the proposed solar array to the village of Gaydon. We accept 9.00-17.00 Monday to Friday inclusive.
- **Noise.** it appears there will be thousands of piles to be driven into the ground. How will JLR keep the noise to an acceptable level on the site boundary with residents? How will the noise be measured?
- **Air quality** with the probable dust being generated by construction. We wish to see a proper air quality baseline prior to construction commencement, and regular air quality monitoring and agreed points on the site boundary, especially on key points near residents' homes.
- **Site compound.** Our residents have experience of alarms going off in nearby site construction offices, often in the night and wish to have this issue addressed before it becomes a problem for this development.
- **Site security and lighting.** Gaydon has a large existing problem with light pollution from the B4100. We wish to understand how JLR will keep this problem to a minimum.
- **Overall.** What set up will JLR put in place to ensure that any operational issues affecting our residents can be rectified in hours, not days or weeks?

Operational Phase

During the operational phase we wish to see the following addressed.

- **Noise.** We are concerned about the potential for noise from the solar array inverters to create a background resonant hum, audible on the site boundary. How will JLR ensure that this noise is not a problem for nearby residents? What measurements will they make as part of the commissioning/ongoing operations to ensure that these noise levels remain acceptable?
- **Lighting.** Gaydon suffers major light pollution already, especially from lighting along the B4100 and from JLR's own site. We wish to ensure that any potential night-time lighting associated with the array, e.g. related to site security, is kept to an absolute minimum and preferably very smart, i.e. only switched on in the event of a potential intrusion and then automatically switches itself back off again.
- **Site security and cameras.** How will this be managed so as to keep impact on the village to an absolute minimum?