

Representation Submitted by LNT Group/Aviation & Blyton Park Driving Centre March 2023

Thank you for your letter dated 15 February 2023 addressed to The Secretary of LNT Aviation Limited advising of the above application for a Development Consent Order to build a solar and energy storage project comprising Cottam 1, 2, 3a and 3b : Four Solar Array sites.

It is understood that the application for a Development Consent Order has been accepted for examination by the Planning Inspectorate (PINS) and relates to what has been classified as a Nationally Significant Infrastructure Project (NSIP). Furthermore, it is understood that LNT Aviation Limited has been identified as a prescribed body and/or a person with an interest in Land (PIL) for the purposes of Section 56 of the Act and/or Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

LNT Aviation Limited – is part of the LNT Group of Companies – including Ginetta Cars Ltd, which are owners and operators of **Blyton Park Driving Centre**, off Kirton Road, to the north east of Blyton Village, immediately to the north of the area referred to within the application as Cottam 3a.

Blyton Park Driving Centre:

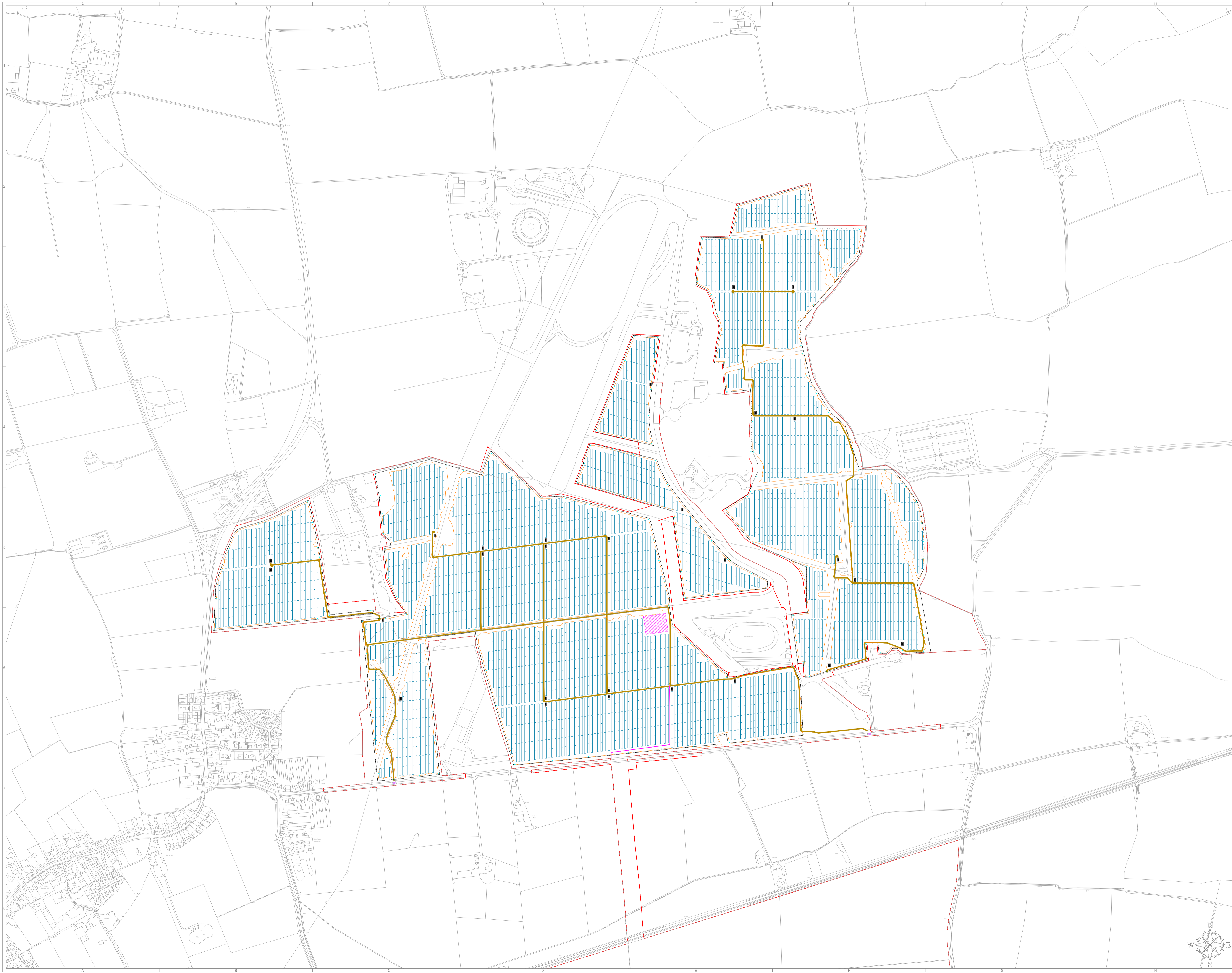
- Blyton Park Driving Centre is a long established Driving Centre utilising the former runways of RAF Blyton, since as long ago as the 1950's
- The Driving Centre usage was formally established in the early 1990's and has developed in this location over a long period of years.
- It currently accommodates a thriving business enterprise with an almost full calendar of driving events and motor sports activity, all year round.
- It is used for driver training; research and development as a well as multiple recreational driving uses and represents a rare opportunity for such automotive uses.
- Planning permission was recently granted by WLDC in March 2022, for development of the Driving Centre as a Automotive Research and Development Centre for new electric vehicle and other automotive technologies.
- The development of the Driving Centre was granted on the basis of positive contribution to the local economy and employment generation and as a facility that would attract visitors and additional tourism to the area.

Proposed Solar & Energy Storage Project

- Prior to receipt of the letter dated 15 February 2023, it is understood that there was no prior consultation with LNT Aviation Limited or the Blyton Park Driving Centre in relation to the proposed Solar project.
- It is understood that the area to the south and east of Blyton Park Driving Centre is proposed to accommodate both an extensive and intensive array of ground mounted solar panels
- Cottam 3a is proposed to the north of Kirton Road and immediately up to the southern and eastern boundaries of the Driving Centre.
- The proposed Solar scheme is intended to cover a significant number of hectares of currently productive agricultural land, attractive countryside and rural landscape.
- The solar panels it is proposed to be installed in the form of -Tracking Panels and/or Fixed Panels, the height of which will be up to 4.5m and typically only some 0.4m above the ground.

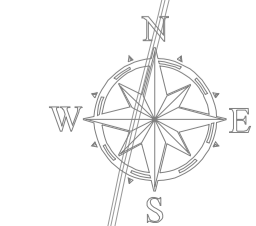
LNT Aviation Ltd/The LNT Group/ Blyton Park Driving Centre wish to STRONGLY OBJECT to the Cottam 3a part of the proposed solar project for the following reasons: -

- The detrimental impact on the character and appearance of the countryside and landscape character to the north-east of Blyton Village and as a consequence to the attractive rural character and setting of the well-established Blyton Park Driving Centre business and premises. Notably the Driving Centre has recently been granted planning permission for appropriate development and enhancement, as a Research & Development facility for new Automotive Technologies.
- Its likely harmful impact as a consequence of the introduction of such a large array of acoustically reflective surfaces and development, in such close proximity to the long established Driving Centre and Motor Vehicle activity that has been successfully restricted and managed in terms of its acoustic impact, over a long period of years and likely significant adverse impact on the amenity of the occupants of nearby residential properties and the acceptance and viability of the adjacent Driving Centre business and its approved future development.
- The impact of glint & glare from the reflective surfaces of such a large array of solar panels in such extremely close proximity to the long established Driving Centre business and motor vehicle activity that will have a significantly detrimental effect in relation to enjoyment of drivers attending the adjacent Driving Centre and most importantly from a health and safety perspective of drivers using the adjacent driving centre and associated circuit, only metres to the north and west of the proposed solar panel arrays.
- The likely detrimental impediment on currently unrestricted access to the established Driving Centre business and circuit, of operatives and visitors, that currently benefit from legal rights of access to, off Kirton Road to the Driving Centre, at all times.
- The likely harmful effects of strong electromagnetic fields generated as a consequence of the proposed solar panels arrays and associated development, on the users of the adjacent Driving Centre and those taking part in any adjacent motor vehicle activity and in relation to the development of the Driving Centre as a new Research & Development facility for New Automotive technologies, including electric vehicles and autonomous vehicle technology development.



General Legend:	
	Order Limits
	Fence
	Potential Development Area
	Mounting Structures and Solar PV Modules
	Conversion Units
	Electrical Substation
	High Voltage Electricity Cable
	Maintenance Tracks
	Gates
	Site Access
	CCTV

Project:	Cottam 3A Solar Project																								
Project Location:	Land at Kilton Road, Blyton, Gainsborough Lincolnshire, DN21 3QA, England																								
Ownership:	Cottam Solar Project Ltd																								
Discriminant Title:	Figure 4.6 Illustrative Site Layout Plan Cottam 3a (APP/IC6.4.4.6) (APPF Regulation 5(2)(a))																								
Sheet format:	A1 "841 x 594"																								
Scale:	1:5000																								
Document versions:	<table border="1"> <thead> <tr> <th>Version</th> <th>Date</th> <th>Author</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>v.2</td> <td>10/04/2022</td> <td>A.A.</td> <td>Updated Layout</td> </tr> <tr> <td>v.3</td> <td>04/05/2022</td> <td>A.A.</td> <td>Final Layout</td> </tr> <tr> <td>v.4</td> <td>14/10/2022</td> <td>A.A.</td> <td>Updated Application Boundary</td> </tr> <tr> <td>v.5</td> <td>20/12/2022</td> <td>A.A.</td> <td>Layout for Submission</td> </tr> <tr> <td>v.6</td> <td>03/01/2023</td> <td>A.A.</td> <td>Layout for Submission</td> </tr> </tbody> </table>	Version	Date	Author	Comments	v.2	10/04/2022	A.A.	Updated Layout	v.3	04/05/2022	A.A.	Final Layout	v.4	14/10/2022	A.A.	Updated Application Boundary	v.5	20/12/2022	A.A.	Layout for Submission	v.6	03/01/2023	A.A.	Layout for Submission
Version	Date	Author	Comments																						
v.2	10/04/2022	A.A.	Updated Layout																						
v.3	04/05/2022	A.A.	Final Layout																						
v.4	14/10/2022	A.A.	Updated Application Boundary																						
v.5	20/12/2022	A.A.	Layout for Submission																						
v.6	03/01/2023	A.A.	Layout for Submission																						
Company:	Island Green Power UK Limited Unit 20.2, Coda Studios 189 Munster Road, London SW6 6AW																								



I did register back in March on behalf of LNT Group /LNT Aviation / Blyton Park Driving Centre to take part in the decision-making process in relation to this project (Registration ID No. 20037132) and did make representations at that time.

It is important to all concerned to be aware that Blyton Park Driving Centre operates on the full extent of the former Airfield to the north-east of the village of Blyton and has done so in a less formal manner from the late 1950's and in a more formal sense since the early 1990's. It utilises the full extent of what remains of the former runways for driver training/practice and is regularly attended by a series of motor racing teams from across the country; general events in respect of the automotive industry; as well as by the emergency services and many others.

It appears clear from the submissions made by the Applicants, in which they made little or no reference to the Driving Centre and airfield activities, that they were somehow unaware of the Driving Centre. The Driving Centre, although set well back from Kirton Road, is a long established and nationally important facility for driver training and practice that is in operation on a daily and intensive basis. Blyton Park is acknowledged by the local Councils as an important contributor to the local economy of West Lyndsey and to the automotive industry and motor racing fraternity across the country. It is one of few such facilities in the country and particularly valuable in a series of ways because of this and includes high speed motor vehicle activity on a very regular basis.

I have attached a Plan Layout drawing of illustrating the Driving Centre's layout, with the old airfield runways that are utilised shaded in blue, from which I hope the driving circuit is appreciable. Also attached is the Proposed Layout Plan recently provided by the applicants for the proposed Solar Farm relatively recently, that identifies a clear and extremely concerning conflict between what is proposed and the continued operation of the Driving Centre. A short site meeting was held with a singular representative of Island Green Power at the Driving Centre in early September, when this conflict was discussed and very clearly illustrated.

It was at this meeting that the detailed extent of the solar panels and proximity to the driving circuit became known to us, which was somewhat of a surprise as this has never, as I could see in any of the information we had seen previously. The Solar Panels were explained as being likely to be 3.5 m in height and planned to be erected on piled foundations suggesting robust construction and are proposed almost immediately up to the edge of the driving circuit at its southern and eastern extent. I cannot stress enough how serious our concern is about this from a health & safety perspective and see extremely significant driver safety concerns, potentially fatal concerns and impacts on the continued operation of the very-well established business activity of the Driving Centre.

It must be appreciated that vehicle speeds on the driving circuit regularly exceed 100mph and given the extent of the driving circuit and lack of development around it, in certain key areas to the south and east of the circuit, drivers are able to make errors and run-off the circuit onto adjacent land, without serious consequences. This has occurred on a continuous basis for as long as the driving activities have gone on at Blyton Park. The proximity of the Solar Panels to the driving circuit is therefore a very serious concern, to which the applicants have not responded since our site meeting with their representative in September. At this stage, we must as LNT Group; LNT Aviation; and Blyton Park, state our objections in the strongest possible terms to the proposed development, as planned at present.

This above has become our most immediate concern about the development in addition to the previously indicated glint and glare concern for drivers and potential for the deflection of noise from the large areas of hard surfacing that would be provided by the solar panel. This all signifies, in our opinion, that the applicants have had little appreciation of the driving/business activities at the former airfield, that we believe must be addressed in the context of their current application as the 'Agents of Change' and must be considered in any decision making, at least in relation to Cottam 3A and that part of the project planned, in proximity to Blyton Park.

We had hoped for better communication from the applicants about their application with us as LNT Group & Aviation and with the Blyton Park Driving Centre, but this has not occurred and somehow our very serious concerns must form part of the decision-making process here. I can also advise that to date we are not satisfied with the applicant's response on the glint and glare issue and have had no meaningful response from them, on the matter of potential noise deflection from the activities on the driving circuit that we have successfully managed and balanced with the local community over many years, to date.

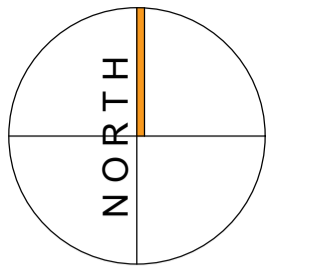
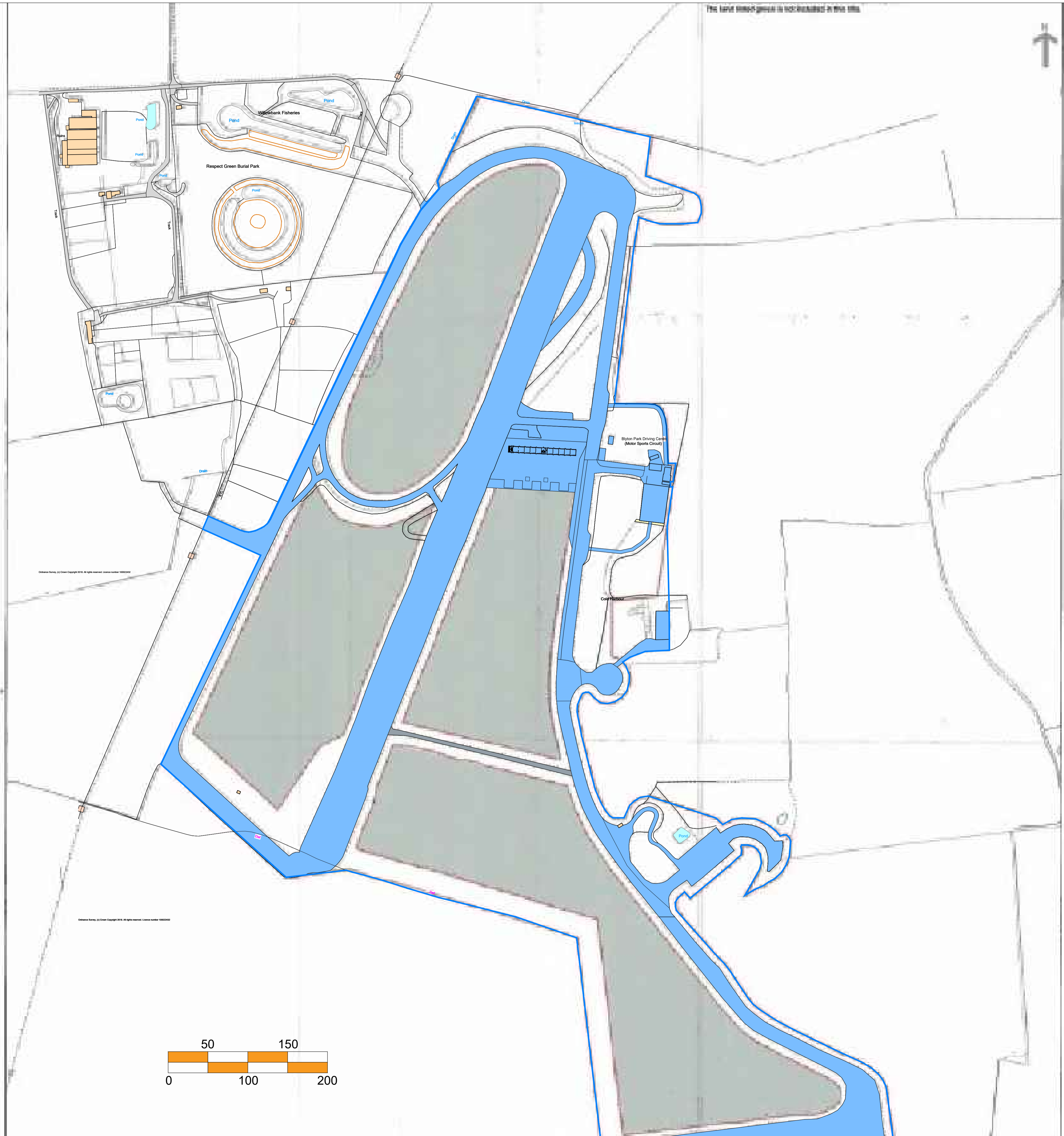
Simon, it is clear to be seen that we have very serious concerns about the proposed Solar Park development as currently planned and have not received any concern or satisfactory response from the applicants to date, therefore, we find that we must now engage in the decision-making process. Please can you advise how we must do this, at this stage.

Yours sincerely

Alistair Wood MA DipTP MRTPI

Planning & Development Manager

LNT Group/LNT Aviation/Blyton Park Driving Centre



REV	DATE	DETAILS OF AMENDMENTS	DRAWN
REVISIONS			

ALL MEASUREMENTS IN mm - DO NOT SCALE - IF IN DOUBT ASK



LNT CONSTRUCTION LTD
 UNIT 2, HELIOS 47
 ISABELLA ROAD
 GARFORTH
 LS25 2DY
 Tel: 0113 3853858
 Fax: 0113 3853859

CLIENT
 LNT AVIATION LTD.

SITE
 OLD BLYTON AIRFIELD
 KIRTON ROAD, BLYTON,
 GAINSBOROUGH

TITLE
 LOCATION PLAN

SCALE	1:2500	DATE	29-09-20
DRAWN	GB	DWG NO.	BLY-01A
DRAWING STATUS			
FEASIBILITY		PLANNING SUBMISSION	
PLANNING APPROVAL		REGULATION SUBMISSION	
REGULATION APPROVAL		CONSTRUCTION ISSUE	
CHECKED BY		DATE	
APPROVED BY		DATE	