

Consultee Comment for planning application 22/01682/F

Application Number	<input type="text" value="22/01682/F"/>
Location	<input type="text" value="Land North Of Manor Farm Noke"/>
Proposal	<input type="text" value="Development of a ground mounted solar farm incorporating the installation of solar PV panels, associated infrastructure and access, as well as landscape planting and designated ecological enhancement areas."/>
Case Officer	<input type="text" value="James Kirkham"/>
Organisation	<input type="text" value="Clerk to Oddington PC"/>
Name	<input type="text" value="Dr Adrian Young"/>
Address	<input type="text" value="Wirepool Cottage Oddington Kidlington Oxfordshire OX5 2RA"/>
Type of Comment	<input type="text" value="Object"/>
Type	<input type="text"/>
Comments	<p>Good afternoon.</p> <p>I attach as a pdf file the substantive response to this application from Oddington Parish Meeting. Our residents, I think without exception, are very strongly opposed to the application and ask that permission be refused. The loss of this beautiful, open, agricultural landscape crisscrossed by public footpaths, and its industrialisation, is terrible to contemplate. It would cause permanent damage to the Green Belt. It would be a huge blow to biodiversity and to production of valuable and (now more than ever) much needed crops. I ask you and your colleagues to carefully consider the many points we make in our submission, and to refuse the application.</p> <p>Please confirm safe receipt.</p> <p>Kind regards,</p> <p>Dr. Adrian Young Chair, Oddington Parish Meeting oddingtonpm@gmail.com 01865 331284</p>
Received Date	<input type="text" value="12/07/2022 14:46:51"/>
Attachments	<p>The following files have been uploaded: Submission by Oddington Parish re. application for solar farm, Noke parish.pdf</p>

Planning Application 22/01682/F by Oxford New Energy

The proposal: - Development of a ground mounted solar farm incorporating the installation of solar PV panels, associated infrastructure and access, as well as landscape planting and designated ecological enhancement areas, on land North of Manor Farm, Noke Parish.

On behalf of the residents of Oddington Parish, and with their overwhelming support, as Chair of Oddington Parish Meeting I strongly oppose the application. We, the residents of Oddington, submit that, taken together, the adverse effects, even after the mitigation measures proposed in the application, will far outweigh the benefits of the actual likely production of renewable energy

Summary of Case:-

Cherwell Policy ESD5 states that renewable energy development is supported only “wherever any adverse effects can be addressed satisfactorily” and where there is “no unacceptable adverse impact, including cumulatively”. The policy is absolute, and is not subject to consideration of the general benefit of renewable energy, which has been taken as read. That is to say, it is concerned only with whether there are adverse effects which cannot be addressed satisfactorily. Should such adverse effects result from the development then permission must be refused.

Adverse effects are acknowledged by the applicant to exist. We will show that they are understated, and that no satisfactory resolution is proposed. The application is therefore contrary to Cherwell and relevant NPPF policy and should be refused. Our reasons are below.

Impact on the completely open, Green Belt, site:-

The application site is a wide plain of outstandingly beautiful open low-lying Green Belt farmland south of the River Ray, surrounded by higher ground with clear open views into and out of the site from the Oxfordshire Way, as far away as from Islip, Beckley, Horton cum Studley and Brill, from the public highway between Islip and Beckley, and from Noke and Oddington. Please see a video of the area at:- <https://www.youtube.com/watch?v=P9KNaY5PFMk>

From the lower levels, but not from the ridge as the land rises towards Noke, these views are partially ‘filtered’ by existing vegetation in summer but not at all for the winter months when trees and hedges are bare. See below the view towards the site to the south from Logg Farm in Oddington, in March 2021, showing only partial ‘filtering’ of the view of the proposed site:-



A number of public footpaths pass through the centre of, and immediately adjacent to, the site. A number of listed buildings, conspicuously the Church of St. Andrew in Oddington and the main residence at Logg Farm in Oddington, overlook the site and would have their setting compromised by the development proposed. The original residence at Logg Farm is Grade 2 listed and has views over the site to the south, about 300 metres distant.

The applicant acknowledges that the solar development will have an adverse affect, and that even after mitigation through planting eventually becomes effective after ten years the adverse impact will still be minor to moderate. (See Landscape and Visual Impact Assessment, page 75 onwards: view points 1,2,3,5,6 all of which are in proximity to the site retain minor to moderate impacts; the remainder which have nil/negligible impacts are distant and largely inappropriate as a test). In the Green Belt, as ESD5 states, visual effects on openness are of particular significance. Although accepting that harm will still remain the applicant's statement underplays its impact.

The applicant relies entirely for mitigation on the effect of existing vegetation screening the site and the eventual effect of further screening to be planted around and within it.

The existing tree and hedge screening would only have a filtering effect on the industrial structures involved in a solar farm, doing little to mask their alien and industrial nature – and then only in the summer when leaves are on the trees. This cannot be addressed by planting alien evergreen hedges or conifer trees which would be inappropriate in a rural setting like this.

As the applicant acknowledges, the new screening proposed along the public footpaths through the site will not become effective for ten years. Even then it will only be likely filter views (as the applicants own exhibits show) and then only in summer. It will also create new harm by creating a tunnel blocking walkers' views of the whole area, and of the otherwise open Green Belt land. At the same time it will do little if anything to prevent the visual impact of the industrial development from the Oxfordshire Way, the public highway between Islip and Beckley, or the surrounding villages. The existing screening, as the photographs show, will have only a filtering effect in summer; the new hedges will not grow for ten years and when they do will block views of the surrounding countryside from within the site, but do nothing to protect the elevated surrounding villages and Oxfordshire Way from the harm the industrial development will have on an unspoilt Green Belt landscape, and the character of Otmoor.

Renewable Energy:-

The application is for a solar farm with a stated capacity of approximately 25MW, said to provide enough energy to power approximately 7,000 homes.

However, in the Network Availability Assessment 18 MW not 25 MW is stated to be the peak to export to the grid, and also that lower figure will itself reduce to 10 MW after forty years as the efficiency of the solar panels declines. That is an average capacity over the lifetime of the project of 14MW, only just over half the claimed 25 MW. None of these figures were challenged by the applicant's agent at a recent meeting in Noke.

Additionally, those figures are peak output, not merely in summer but on the very sunniest (most irradiated) foreseeable day in summer. Summer irradiation is five times as high in the summer months as the winter, so the average output over the lifetime of the project would be around 7 MW. The seasonal nature of solar energy production means that it requires back up from other more reliable sources for most of the year.

All these factors mean that the renewable energy produced by the site would be insignificant both in terms of Cherwell overall usage, and the District's Climate Emergency objective of zero carbon by 2030.

The site's insignificant and intermittent contribution to the District's zero carbon objectives would be wholly inadequate to outweigh the cumulative adverse consequences of the development.

Impact on agriculture:-

Paragraph 174 of the National Planning Policy Framework requires planning decisions to recognise the benefits of the best and most versatile agricultural land (grades 1-3a.)

The applicants assess the site as mostly grade 3b, so classified on the basis that it is too wet for spring sowing, with two small areas of 3a. However they accept that there are other small patches of 3a.

The boundary between 3a and 3b is subjective. Local informed opinion, and observation of the quality of the crops presently growing on the site, is that the balance towards 3a is very considerably greater, and it is a fact that it is mostly sowable in spring, contrary to the assertion of the applicants, as the current crop of linseed testifies (only planted after the archaeological works in April 2022).

The present farmers of the land report 'At present the majority of the site is maturing wheat sown in the autumn (2021), directly into linseed stubble and bean stubble. A lesser area of linseed, now flowering, was sown this spring (2022). Last year (2021) spring sown beans and linseed were grown in the fields under the planning proposal. In 2020 spring sown wheat was grown. Planting decisions depend on the weather at harvest time (whether it is a late or early harvest) and where we are in the crop rotation, not any limitations due to the soil'.

The solar farm would therefore remove a site which is presently growing a large area of wheat (of which there is a global shortage) and linseed (which is a bio-mass crop where the seeds go to bio-fuel and the stems to heating, and therefore already contributing to Cherwell's Climate Emergency objectives). Food can be produced only on suitably good, fertile, agricultural land, which this demonstrably is.

Much is made of the claim that the site will continue in agricultural use with sheep grazing under the panels. But sheep grazing is the least productive and efficient form of agriculture where cultivation is otherwise unfeasible, as on hill farms, and is no substitute for the high quality arable crops the site is presently producing. In any case Climate Emergency strategies require a reduction in meat consumption.

Sheep grazing is, in fact, contradictory to the claimed benefit of bio-diversity since sheep will eat anything and everything unless fenced off. The proposal contains no information on sheep management for the purposes of enhancing biodiversity.

Bio-diversity:-

Wide field boundaries and alongside the public paths already provide bio-diversity, as does the tree cover of the site and the nearby River Ray. It is proposed to leave one very small corner of one field adjacent to the solar farm site untouched, and it is asserted that bio-diversity will be improved by new flora and fauna under and between the panels. But this cannot be expected to offset the considerable impact on the rest of the site of the erection of the solar panels or their continuing presence blocking light.

Increased bio-diversity under the panels would be inconsistent with keeping sheep, which are well known for eating almost anything, and the solar farm land will in any case be less productive for most flora and fauna, the purpose of the panels being to block the light which creates growth.

The very close proximity to the RSPB bird reserve and associated wetlands just a few hundred yards away, and the adverse effects on the very special wildlife there, are another major cause for concern. For example, rare cranes have nested successfully there in 2021 and 2022, for the first time in Oxfordshire in 500 years.

Impact on listed buildings:-

The impact on listed buildings must be measured by the impact of inappropriate development on views of the listed assets, to and from both near and far. Thus the Church of St. Andrew in Oddington will not only be viewed from across the valley over a solar farm, but visitors to the church will be distracted by the site of the solar farm from the entrance path. Although a very limited view of St. Nicholas' Church in Islip from a single location in the development has been preserved by the applicant, numerous other presently clear views of it will be lost as the footpaths are enclosed by panels and screening vegetation. All views of and from the proposed site, and from the public footpaths within it, will be harmed by the panels for the next ten years and every winter for ten years, until they are totally obscured by growth of the additional nine feet high screening vegetation proposed.

Green Belt:-

The stated fundamental aim of the Green Belt is to keep land permanently open, and that is also the thrust of ESD5 which requires adverse effects on the Green Belt, especially visible impacts on openness, to be avoided.

There are five subsidiary purposes of the Green Belt of which the most relevant as the applicant states, is purpose 3, (c) in the NPPF; to safeguard the countryside from encroachment.

As the applicant states, the site lies in Broad Area 3 of the Green Belt study where it is noted as making a high contribution to safeguarding the countryside from encroachment. This "broad area" is much wider than Otmoor itself and includes part of the M40, a gipsy camp, and other development. It can only be the present extraordinarily open and unspoilt characteristics of Otmoor and the nearby agricultural land that has lifted the whole broad area into the HIGH category.

A solar farm would be a particularly intrusive visual development because of its sheer size and industrial nature. The applicant claims that nearby Logg Farm offers a "context of built form" but farm buildings are wholly appropriate in the countryside, with a very small footprint, and not an alien industrialisation as a solar farm would be.

It will be clearly harmful to the perception of Green Belt openness from the high points surrounding the site – the Oxfordshire Way and the public highway between Islip and Beckley, for example. Lower down, the solar farm will be clearly visible for the ten years until the hedging screening has grown to the height of the panels. After that, views of the development may be filtered or partly screened but the alien presence will still be apparent, especially in winter. It is inescapable that as the height of screening increases, long distance views must decrease. Within the site from the public footpaths, the present sense of openness and the present long range views will be lost completely.

There will therefore clearly be a substantial adverse effect on the Green Belt, particularly in the form of visual impacts on openness, and in encroachment, and the development will therefore be contrary to ESD5.

It may have only a forty year life span unless permission is renewed but forty years is still more than a generation and this should not be given any significant weight. In any event, it seems unlikely that the land would ever be returned to agriculture; it is more likely the panels would be renewed.

The following pictures of the site, illustrating its openness and outstanding beauty, were all taken in early July 2022:-

View across the north-easterly field of proposed site towards south-west, from the public footpath, presently growing wheat sown in autumn 2021. This view would be entirely obscured by hedging, fencing and panels:-



Healthy, presently ripening, wheat in the north-easterly field:-



View across the westerly field of site from the public footpath, proposed to be enclosed by fences, hedging and panels. Presently growing wheat planted in autumn 2021:-



View of and from the public footpath between Noke and Oddington proposed to be enclosed by hedges and fencing and panels to both sides. The adjacent south-easterly field, to be covered by panels, is presently growing linseed sown in spring 2022:-



View of the south-easterly field of the site from the public footpath, looking towards Beckley. . This view will be entirely lost to hedging, fencing and panels. Linseed sown in spring 2022:-



Healthy linseed in the south-easterly field:-



View from the public footpath across the westerly field of the site towards Islip, showing St. Nicholas' church in the distance. Presently growing wheat sown in autumn 2021, this field is proposed to be entirely covered in panels, and the view from the footpath totally obscured by these and by fencing and hedging:-



While we support renewable energy that does not mean it needs to be everywhere, as both District and National Policy recognise. Unspoilt Green Belt Otmoor is a wholly inappropriate site.

In light of these comments and evidence, Planning Application 22/01682/F should be refused.

Dr. Adrian Young
Chair, Oddington Parish Meeting.
On behalf of the residents of Oddington.