From: francis and charlotte josephs Sent: 12 July 2022 10:28 To: Planning Subject: Planning application 22/01682/F

Dear James Kirkham

I wish to oppose the proposed Solar Farm at Manor Farm Noke. (planning application 22/01682/F) My argument falls into two parts:

- The Green Nation Consultation Document contains highly misleading and incorrect arguments and information
- The application will have an unacceptable adverse impact on the a truly unique and stunning environment, according to the criteria in your own CDC policy ESD5

The Green Nation application consistently downgrades the area by claiming that "the landscape quality of the site, and its landscape context is generally poor" (6.18). Later it says that "any impact on the Green Belt in landscape and visual terms will be limited." (5.14). I absolutely dispute this. It's a beautiful and haunting area, teeming with wildlife, with lovely 360 degree views. The solar factory will destroy views on the ground, as walkers will be surrounded by tall hedges and security fences; views from the surrounding hills will be greatly damaged by the sea of panels.

I have little faith in the photomontage of how invisible the panels will be from all sides, as the photos of the existing site in the Consultation are highly misleading. I suspect some are taken from very low down to make the views unimpressive. There seems to be a pattern of highlighting the very few unattractive features in the area: a large ugly concrete wall by Rectory farm, some damaged hedgerows, and views with broken metal fences or wheelie bins prominent in the foreground. I assume this is done, as they are aware that CDC maintains that there should be exceptional circumstances to allow development in the Green Belt.

Green Nation's Table A6 (p 13) seems crucial to me:

Significance of Effect	Description The proposed development would:	
Major Adverse (Negative) Effect	Be at substantial variance with the character of the receiving landscape.	
	Result in the total loss of a range of characteristic elements and features.	
	Damage the sense of place.	
Moderate Adverse (Negative) Effect	Be at variance or inconsistency with the character of the receiving landscape.	
	Degrade or diminish the integrity of a range of characteristic elements and features.	
	Detract from the sense of place.	
Minor Adverse (Negative) Effect	Not quite fit the character of the receiving landscape.	
	Have some variance with characteristic elements and features.	
	Have a limited influence on sense of place.	
Neutral/Negligible Effect	Maintain the character of the receiving landscape.	
	Blend in with characteristic elements and features.	
	Enable the sense of place to be retained.	
Minor Beneficial (Positive) Effect	Complement the character of the receiving landscape.	
	Maintain or enhance characteristic elements and features.	
	Enable some sense of place to be restored.	

Table A 5: Criteria for	determining significance	of landscane offects
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Green Nation concludes at 8.9 (p92) that the effects on landscape character will be Minor Adverse, and by year 10 Negligible to Minor Adverse. This means that they believe that the solar farm "will maintain the character of the receiving landscape; blend in with characteristic elements and features; enable the sense of place to be retained."

This seems nonsense to me. I'd say that the impact will be more like Major Adverse/Moderate Adverse in Table A6. It would certainly "damage/detract from the sense of place", as well as "degrading the integrity of a range of characteristic elements and features".

I understand that the CDC policy is largely in favour of solar energy, but does take into account landscape considerations. Its key policy (ESD 5) is:

Planning applications involving renewable energy development will be encouraged provided that there is no unacceptable adverse impact, including cumulative impact, on the following issues, which are considered to be of particular local significance in Cherwell: Landscape and biodiversity including designations, protected habitats and species, and Conservation Target Areas, Visual impacts on local landscapes, The historic environment including designated and non designated assets and their settings, The Green Belt, particularly visual impacts on openness, Aviation activities, Highways and access issues, and Residential amenity.

It seems to me that this application would result in unacceptable adverse impact on many items listed above: landscape and biodiversity; protected habitats and species; the historic environment; the Green Belt; and visual impact on openness.

Also worth thinking about is the longer-term future. The present application is to cover about half of Manor Farm with solar panels. If this is successful, it's not implausible that a second application will follow in later years to cover the remaining half of the farm (another 120 acres / 49 hectares). In future, all the area covered by panels will be considered 'brownfield land' and would be ripe for redevelopment with something else, such as housing. At all events, any land that is used for the solar farm now will almost certainly never be green again.

Otmoor represents one of the largest undeveloped spaces that remain in Oxfordshire. It is a mere 4 kms from the Oxford ring road, offering a rare and accessible place of freedom and escape. You are probably aware of a <u>proposal</u> to make the whole of the Otmoor/Bernwood/River Ray catchment area (one of the last remaining traditional floodplain meadows in England) a regional park, with some of the best-preserved natural environments in southern England. Putting any sort of development in such an area, however worthy, would spoil it irretrievably.

I am particularly concerned about the proximity of the solar farm to the RSPB Bird Reserve on Otmoor, where cranes and marsh harriers bred successfully for the very first time in 600 years and 150 years respectively. The site is also home to bitterns, curlews and turtle doves . The solar farm would be less than 400metres away from the Bird Reserve and only just over 1 km away from the permanently flooded area within it. Wetland birds and insect life are attracted to the large shiny surfaces of water bodies. Over 100 acres of shiny panels could disorientate migrating and other birds; there is also evidence from the US that the noise created by the solar farm can affect birds. The Ecological Survey carried out for the developer concentrated on the wildlife recorded within the solar farm area and concluded that "impacts to any off-site designated sites are highly unlikely due to the distances and nature of the work". This is an unsubstantiated opinion for which there is absolutely no evidence at all. Both Friends of the Earth and the RSPB recommend that solar farms should avoid wildlife sites if at all possible.

A stand-out feature of Otmoor and the surrounding area is its open, undeveloped character, a rare haven for wildlife and humans alike. 108 acres of panelling would subvert its character considerably. If a solar farm is allowed here, in such a unique habitat, it would set a very disquieting precedent. I welcome solar farms - our challenge is to meet that environmental priority while not trampling on other ones: the preservation of precious landscapes and protection of fragile biodiversity. The solar park would fall entirely within the Green Belt. Para 151 of the NPPF (National Planning Policy Framework) states that renewable energy projects are inappropriate developments on Green Belt land, and should only be allowed in 'very special circumstances' – which I do not believe apply here. Otmoor is no sunnier than any other patch of land in southern England.

In its initial leaflet, Green Nation claimed that this was the only suitable site in CDC. We now learn that it chose this site only after the landowner approached them. We do need solar power, but there must be lots of alternative sites in CDC out of the green belt, perhaps by main roads or on brownfield sites, or on the many warehouse complexes in CDC, away from footpaths and from views enjoyed by the public. I do realise that Green Nation would then have to use more of its profits to connect to the grid.

However, it seems to me utterly wrong to choose a site in the green Belt with stunning views and right by the Oxfordshire way and other footpaths. I walk the site regularly in all seasons, and I have added below a brief video I took recently, in which you can only hear the wind and the skylarks. In it you will see the 360 degree views of fields and hills, including Beckley, Horton, Brill, Muswell and Noke. The fertile fields provide a habitat for many mammals, insects and birds, as well as providing the homegrown crops, of which the UK has a desperate need. Over the years I have seen or heard there over 34 species of birds, including cuckoo, curlew, buzzard, kingfisher, raven, linnet, yellowhammer, swift, swallow and hobby- and once, a pair of cranes flew over. There are many butterflies, bees and moths, as well as mammals such as hare, weasel, deer, grass snake and field mice. It's a site adjacent to the amazing RSPB Otmoor bird reserve, with its unique inland wetlands, and surrounded by SSSIs, woodlands, quiet lanes and peaceful historic villages. It's in the Conservation Target Area, and has recently been suggested as a part of a Regional Nature Park. It's an area that has had applications for development rejected by planning officers three times in the last 40 years. It was last built on by the Romans. I do hope that you can reject this application, and help to preserve this very special, haunting place for the next 2000 years.

I would be very happy to be contacted, if you wished to follow up any issues.

Yours sincerely

Francis Josephs, Manor Grounds, Noke, Oxford OX£ 9TX