

# Comment for planning application 22/01682/F

<b>Application Number</b>	22/01682/F
<b>Location</b>	Land North Of Manor Farm Noke
<b>Proposal</b>	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.
<b>Case Officer</b>	James Kirkham
<b>Organisation Name</b>	Smith Dixon
<b>Address</b>	Hill End Farm, Street Through Noke, Noke, Oxford, OX3 9TX
<b>Type of Comment</b>	Objection
<b>Type</b>	neighbour
<b>Comments</b>	<p>As adjoining landowners, we did not receive notification of this planning application. Whilst we recognise the imperative to support renewable energy (we installed roof mounted solar panels on our agricultural building in 2015), this is the wrong place for a ground mounted solar development of this size (area of 95.3 acres, panel height 2.8 metres) for the following reasons:</p> <p><b>Green Belt development</b> With development pressures on the Oxford Green Belt (OGB), this land should only be removed from the OGB if it is absolutely imperative [NPPF paragraph 155 states that "When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed.] [NPPF requires (paragraph 2) that "applications for planning permission be determined in accordance with the development plan". Cherwell Policy ESD5 has predetermined that renewable energy is a general benefit but that it will be permitted on a particular site only where "any adverse effects can be addressed satisfactorily" and additionally, with regard to the Green Belt, "particularly visual impacts on openness".] Whilst renewable energy is vital, there are compelling reasons to turn down this application. It extends into Oxfordshire's Target Conservation Area. The locality is open countryside bordering the unique wetlands of Otmoor. The neighbouring Otmoor RSPB Reserve is of national importance attracting high numbers of breeding ground nesting birds and waders. The choice of this site has not been informed by any planning strategy, it is opportunistic given the vicinity of high voltage powerline and speculative developers. Existing ground mounted solar developments along trunk roads (eg Arncott M40; A40 between Witney and Oxford, Wendlebury A34/M40) are less intrusive and similar sites must be considered. Once land has been removed from the Green Belt, it is highly unlikely to be restored. As has occurred with mobile phone masts, the site becomes a permanent part of the National Infrastructure. Granting permission for this development could set a precedent for other applications (as the National Grid infrastructure is up graded) as has been the case in both Dorset and Devon. The application must be refused in line with Cherwell Policy ESD5.</p> <p><b>Visual impact and public amenity</b> The applicants' assessment of the 'landscape quality of the site and its local landscape context is generally poor.' [Landscape &amp; Visual Impact Assessment p62] is a gross under-estimation. The site is set in the Otmoor basin with extensive views of open countryside to and from the surrounding higher ground. Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust's website describes the River Ray and Otmoor locality as containing 'some of the best-preserved natural environment in southern England, with ancient woodland and nationally-scarce floodplain meadows'. Public enjoyment of both well used Noke-Oddington footpath traversing this site and the adjacent Oxfordshire Way between Islip and Noke; will be adversely affected by 2.8 metre panels, security fencing and infrastructure. The development will be clearly visible from vantage points in Islip, Beckley and Oddington. The proposed landscape planting will take 10 years [Landscape &amp; Visual Impact Assessment p70] to provide hedge/tree screening. Native deciduous trees will provide minimal screening in winter and high percentage of evergreen species will stand out adversely in the landscape.</p> <p><b>Renewable energy and food security</b> The figures quoted in the application for estimated power generation capacity over the</p>

lifetime of the panels have been disputed (including CPRE comments) and at least require further investigation. The proposed development must be carefully balanced with the need for plant based food production. This land has been farmed for hundreds of years. It is currently farmed under contract and if this development goes ahead the local farming economy will be weakened and food production reduced at a time of increasing concern over food security. As part of cereal rotation, it is already contributing to renewable energy by producing biofuels (including in a local biomass plant). The contract farmer is increasingly using regenerative farming methods. The proposed sheep grazing under panels, switching from cereal to meat production, appears to conflict with Cherwell's zero carbon target. In addition could pose animal welfare issues as ailing sheep often hide and are obscured from view by the panel infrastructure.

#### Biodiversity

The applicant's BSG ecology Ecological Appraisal does not consider the impact of the solar development on the wider environs. Our neighbouring grassland farm has been under Agri-Environment schemes since 1999. The River Ray, wooded area on the river banks and ancient river meadows on the north side are important for biodiversity. The surrounding arable fields provide a rich mosaic of feeding grounds for overwintering waders such as lapwing and golden plover, as well as mammals and invertebrates. The applicant's calculation of biodiversity net gain (BNG) through mitigation works is not convincing, and is not evidence based as there is a lack of robust published research on BNG. There are concerns that solar PV panels will have a direct negative impact on birds, bats and some flying invertebrates such as water beetles. Research is yet to be conducted into the effects but Natural England cautions that "protected areas should be avoided when considering site selection of solar PV developments, with some sources suggesting that locations close to protected areas should also be avoided.. Solar panels have the capacity to reflect polarised light, which can attract polarotactic insects, which has the potential to impact their reproductive biology. The polarising effect of solar panels may also induce drinking behaviour in some bird taxa, where the birds mistake the panels for water.." [Harrison et al. (2017) Natural England Report, NEER012]. More research is needed before developments extending into Target Conservation Areas can go ahead.

#### In conclusion

In making a balanced planning decision, we urge the committee to reject this application.

**Received Date**

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**Attachments**