From: George Smith Sent: 12 July 2022 17:28 To: James Kirkham Subject: Planning Application - 22/01682/F

Dear James,

I am writing to you regarding the proposed solar farm in Noke (Planning Application - 22/01682/F), which I am opposed to for the following reasons.

The land selected for solar panels is on high yielding productive farmland that is and has been used to successfully grow wheat, barley, oilseed rape and beans to help feed the UK population.

In the interest of eating more sustainably and reducing food miles we should not be removing large areas of productive farmland. Doing so will only increase our reliance on food imports and increase carbon being released into the atmosphere.

Whilst there is a need for renewable energy sources, productive arable land should not be destroyed to meet this demand because although it helps to solve one issue it creates another. Solar panels, if they are to be installed at ground level, should be located on areas of land that are not used for food production. The importance of producing our own food has been highlighted by the war in Ukraine which has put at risk global wheat supplies causing prices to rise.

The area of land is located next to the Otmoor RSPB nature reserve that attracts bird watchers and walkers to the area. Building of the solar farm would have a significant visual impact on those visiting the area. The footpath that currently runs alongside farmland will be encircled by solar panels (2.8m tall), fences (2.1m tall) and security cameras (3.2m tall) which will ruin this stretch of footpath. The land towards Logg Farm and Oddington is lower than the solar panel location which will make the solar farm visible and a scar on the landscape from the village.

Additionally, the ground is on a North facing slope which is undesirable for solar farms with many solar farm companies only developing flat or south sloping land. The solar panels in this proposal must be excessively tall to compensate for the north facing slope. Tracking solar panels are more efficient and should be used for future development because they can be up to 15% more efficient however this is not possible on this land because of its north facing slope (Ref 1). This land was not and would not have been chosen by a solar company for solar panels because of its north facing slope, footpaths, proximity to Otmoor RSPB nature reserve and local heritage assets that will be compromised, the only reason for the proposal is because the landowner went to Green Nation asking to put panels on his land for his own economic gain.

The plans do not benefit locals in the neighbouring villages (Noke, Islip, Oddington). In fact, this proposal will ruin the beautiful and open footpath between Oddington and Noke. The power is being fed directly back into the national grid and not supplying local residents with power which is another negative. The 3 villages have a lot of historic value that attracts tourists and locals to explore them and walk between them on the footpaths.

Many locals and tourists visit the area to explore the circular route around the RSPB nature reserve and the solar panels would greatly reduce the nature, biodiversity and visual appearance of the area.

Green Nation state that they ideally use brownfield sites for solar farms and if no brownfield sites are available, they would use low grade agricultural land. From the Gov.uk website low grade agricultural land would be grade 4 "poor quality land" or lower. The land quality in the area proposed has successfully grown high yielding crops of oil seed rape, wheat and spring beans which should not be possible according to the <u>gov.uk</u> website if it were truly poor-quality land. Thus, this land should not be used for a solar farm because it is productive and high yielding agricultural land. The land quality survey I believe to be biased and inaccurate and could have been influenced by the landowner and Green Nation when it was carried out because the fields and notably the most northern field that the footpath runs along next to the footpath is good quality and high yielding. It would likely be graded as 3a by a non-biased soil analysis company, making it unacceptable to put solar panels on.

The Oxfordshire way is a popular and historic walk with many points of interest in Islip and Noke that causes tourists and locals to love visiting the area and walking between the two villages (Ref 4). The highland that the footpath the Oxfordshire Way follows will look directly down onto the solar farm with all the panels being visible to walkers. This section of path from Islip to Noke is historically known as "The Wake" or "Coffin" path and is mentioned as a point of interest on the Oxfordshire County Council website. It would be a shame for such historic villages to be in such close proximity to the panels and ruin the view from the Oxfordshire way down towards the River Ray and Otmoor RSPB nature reserve.

The solar farm in such proximity to the RSPB nature reserve could cause issues for the high number and diversity of birds in the area. Paper by Natural England 2017 suggests not to build solar farms near protected areas such as an RSPB nature reserve (Ref 5), but research into the potential effects are still ongoing.

Having attended Green Nation meetings during the planning of this solar farm and reading the surveys carried out the information they put forward towards this solar farm is incredibly unrepresentative and they are clearly doing anything in their power to mislead the public and planners to complete the development. For example, when questioned about who would manage the temporary footpath, they would not give a straight answer even when I questioned them multiple times. I have this recorded if you would like to listen to it. They made much of their proposal to boost the biodiversity on the island however the west end of it is currently left natural as a flower meadow so there will be very little increase in biodiversity by sowing a few more different flower species on it. The rest of the island has a mixture of mature trees and dense undergrowth. The planting suggested around the solar panels will never completely hide the panels when walking alongside the footpath and will transform this typical English countryside with wide ranging distant views into something akin to a city park.

They suggested planting a turtle dove mix however there have been no turtle doves in the area for many years! The temporary road to the solar panels will cause lots of issues for Noke because the single entrance and exit to Noke is a single-track road that the work traffic will have to go down.

Coming down here with a tractor to enter the field during summer you would typically meet someone, and it would be difficult to pass causing congestion even though it is not a long distance before you can enter the field.

The location of the solar panels in relation to the Oxfordshire way, Oddington and Noke can be seen in the images below. The solar farm will be visible from the historic St Andrews church in Oddington, grade 2 listed Rectory Farm House and grade 2 listed Logg Farm House.

To see the images and the extracts taken from each reference please open the attached PDF.

Ref 1: <u>https://www.renewableenergyhub.co.uk/blog/everything-you-need-to-know-about-solar-farm-requirements/</u>

Ref 2: https://greennation.co.uk/asset-development/#development

**Ref 3**: <u>https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-</u><u>development/guide-to-assessing-development-proposals-on-agricultural-land</u>

**Ref 4**: <u>https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/walks-and-rides/oxfordshire-way</u>

Ref 5: http://publications.naturalengland.org.uk/publication/6384664523046912

Thank you for taking the time to read this email. Please would you consider opposing this development proposal.

Kind regards,

George Smith Logg Mead House Oddington Kidlington Oxfordshire OX5 2QU

#### I object to the proposal for the following reasons:

The land selected for solar panels is on high yielding productive farmland that is and has been used to successfully grow wheat, barley, oilseed rape and beans to help feed the UK population.

In the interest of eating more sustainably and reducing food miles we should not be removing large areas of productive farmland. Doing so will only increase our reliance on food imports and increase carbon being released into the atmosphere.

Whilst there is a need for renewable energy sources, productive arable land should not be destroyed to meet this demand because although it helps to solve one issue it creates another. Solar panels, if they are to be installed at ground level, should be located on areas of land that it not used for food production. The importance of producing our own food has been highlighted by the war in Ukraine which has put at risk global wheat supplies causing prices to rise.

The area of land is located next to the Otmoor RSPB nature reserve that attracts bird watchers and walkers to the area. Building of the solar farm would have a significant visual impact on those visiting the area. The footpath that currently runs alongside farmland will be encircled by solar panels (2.8m tall), fences (2.1m tall) and security cameras (3.2m tall) which will ruin this stretch of footpath. The land towards Logg Farm and Oddington is lower than the solar panel location which will make the solar farm visible and a scar on the landscape from the village. There are a high number of brown hares that live in these fields and hedge rows which would be badly impacted by the solar farm.

Additionally, the ground is on a North facing slope which is undesirable for solar farms with many solar farm companies only developing flat or south sloping land. The solar panels in this proposal must be excessively tall to compensate for the north facing slope. Tracking solar panels are more efficient and should be used for future development because they can be up to 15% more efficient however this is not possible on this land because of its north facing slope. This land was not and would not have been chosen by a solar company for solar panels because of its north facing slope, footpaths, proximity to Otmoor RSPB nature reserve and local heritage assets that will be compromised, the only reason for the proposal is because the landowner went to Green Nation asking to put panels on his land for his own economic gain.

indicator that a connection application may be successful. The further away a location is from the grid, the higher the cost of interconnection for the developer. Solar farms are normally built on rural land. There needs to be careful thought given as to the suitability of the land chosen for a solar farm. The prime spots for solar farms are either on flat land or on a south facing slope. Ground mounted solar panel systems of greater than 9m sq. (4-5 large solar panels) require planning permission. This means that all solar farms require planning permission. In order to get approval

## https://www.renewableenergyhub.co.uk/blog/everything-you-need-to-know-about-solar-farm-requirements/

The plans do not benefit locals in the neighbouring villages (Noke, Islip, Oddington). In fact, this proposal will ruin the beautiful and open footpath between Oddington and Noke. The power is being fed directly back into the national grid and not supplying local residents with power which is another negative. The 3 villages have a lot of historic value that attracts tourists and locals to explore them and walk between them on the footpaths.

Many locals and tourists visit the area to explore the circular route around the RSPB nature reserve and the solar panels would greatly reduce the nature, biodiversity and visual appearance of the area.

#### Development of Solar Farms and Storage Assets

As part of their efforts to achieve targets for decarbonised power generation, the UK and other countries need to build many more solar farms – as well as other renewable energy sources.

Green Nation is using its experience over the past decade of developing solar farms to play its part in this effort.

Solar farms are ground-mounted solar installations made up of solar panels fixed to metal frames and arranged in rows across an unshaded section of land. A typical solar farm produces peak renewable electricity output measured in the megawatts. We design them to blend into the countryside where they cause no disturbance and make no noise.

Sites should ideally be brownfield land, or low-grade agricultural land, with a connection to the electricity grid available nearby. If they are agricultural land, they can be grazed by sheep once the solar farm is in operation.

#### https://greennation.co.uk/asset-development/#development

#### 4.2 Grade 2 - very good quality agricultural land

Land with minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than grade 1.

#### 4.3 Grade 3 - good to moderate quality agricultural land

Land with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in grades 1 and 2.

#### 4.4 Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of crops including:

- cereals
- grass
- oilseed rape
- potatoes
- sugar beet
- less demanding horticultural crops

#### 4.5 Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally:

- cereals and grass
- lower yields of a wider range of crops
- high yields of grass which can be grazed or harvested over most of the year

#### 4.6 Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops or level of yields. It is mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought.

#### 4.7 Grade 5 - very poor quality agricultural land

Land with very severe limitations that restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.



Coleford Solar Farm Inverter-Transformer Station

https://www.gov.uk/government/publications/agricultural-land-assess-proposals-fordevelopment/guide-to-assessing-development-proposals-on-agricultural-land

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## **Oxfordshire Way**

Downloadable maps and directions for this 66 mile walk from the Cotswolds to the Chilterns.

The Oxfordshire Way winds through Oxfordshire from Bourton-on-the-Water in Gloucestershire to the banks of the River Thames in Henley. The route passes through a mosaic of contrasting landscapes and settlements including two areas of outstanding natural beauty; the pretty rolling Cotswold Hills and the Chilterns; plus some fascinating countryside in between.

#### There are a number of stiles along the route.

https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/walks-andrides/oxfordshire-way



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To be used in cross-reference with the letters marked on the map

### **Points of interest**

Islip has many attractive buildings including the Old Rectory, built in 1690 by the Rector Dr South who also founded and endowed the village school in 1710. Other buildings include Manor Farm in Upper Street (sixteenth century) and a house in High Street (seventeenth century), formerly the King's Head Inn. Islip lay on the coach route from London to Worcester and had at one time twenty-one inns. Now there are only two, the Red Lion and the Swan Inn. In the last field you crossed before entering the village once stood a palace of Ethelred the Unready, where in AD 1004 King Edward the Confessor was born. When King Edward built Westminster Abbey he gave it to the manor of Islip. Simon of Islip became Archbishop of Canterbury in 1348, and John of Islip became Prior of Westminster in 1500 and presided over the building of the Henry VII chapel. As befitting for a village with such history, Islip church dominates the village. In the Civil War, Islip was an important outpost in the Royalist defence of their headquarters at Oxford, and in 1645, Cromwell defeated he Royalist forces at Islip Bridge, the bridge over the River Ray at the southern end of the village. The old stone bridge was rebuilt in 1878. Until the latter part of the nineteenth century, when drainage and new cuttings partially tamed the River Ray, Islip was a prime source for fish supplies.

The name 'Noke' is derived from 'the oak tree', recalling the origin of the village as a clearway in the forest. There are still a few of the ancient oak trees surviving. The church dates

from the thirteenth century and was restored in 1883. When Edward the Confessor granted the fees of Islip to the Abbey of Westminster, part of the parish of Noke was included in the grant. Those who paid their tithes to Islip buried their dead in Islip churchyard and to this day the path from Islip to Noke is therefore known as the 'Wake' or 'Coffin' path. Manor Farm dates from the late sixteenth to eighteenth centuries and the Old Rectory has a central block dating from the seventeenth century with later extensions. The Plough Inn was originally a cottage and probably dates from the seventeenth century.

Beckley stands on a ridge of the Oxford Heights, 350 feet above the plain of Otmoor. Otmoor contains a layer of Oxford clay and for centuries was a swamp, used for wildfowl and fish and ringed by rough pasture. This way of life persisted for centuries, until the moor was forcibly enclosed in 1830 and the Otmoor Riots that followed are famous. 'Progress' won in the end and the River Ray was rechannelled, although these measures were never wholly successful and the moor remains a haven for birds and plants. The church of St Mary was originally Norman, rebuilt in the fourteenth and fifteenth centuries. Beckley Park, now a listed building, was built around 1540, possibly as a hunting lodge, though the history of the site and three moats goes back many centuries before.





The Oxfordshire way is a popular and historic walk with many points of interest in Islip and Noke that causes tourists and locals to love visiting the area and walking between the two villages. The highland that the footpath the Oxfordshire Way follows will look directly down onto the solar farm with all the panels being visible to walkers. This section of path from Islip to Noke is historically known as "The Wake" or "Coffin" path and is mentioned as a point of interest on the Oxfordshire County Council website. It would be a shame for such historic villages to be in such close proximity to the panels and ruin the view from the Oxfordshire way down towards the River Ray and Otmoor RSPB nature reserve.

## Oxfordshire Way Map 22 - Islip to Beckley I (Islip to Noke)

# Evidence review of the impact of solar farms on birds, bats and general ecology 2016 (NEER012)

This record was published by Natural England on 9 March 2017.

Bats Birds - conservation and protection Natural England Evidence Reviews Renewable energy

The review aimed to gather and synthesise evidence from the scientific and grey literature in order to provide a comprehensive and cohesive report on current thinking towards the potential ecological impacts of solar PV developments. Special emphasis was given to the taxa Aves (birds) and Chiroptera (bats). Gaps in the literature were identified and suggestions were made for future research needs. In addition, planning applications and decisions for solar PV developments in the north west of England were reviewed in an attempt to identify reasons for the refusal of planning permission by local authorities, reflecting perceived negative impacts of solar PV determined whether the reasons were ecologically based.



#### http://publications.naturalengland.org.uk/publication/6384664523046912

When considering site selection for utility scale solar developments it is generally agreed that protected areas should be avoided. This is reflected in the scientific literature where modelling approaches include many factors such as economic considerations and visual impact but also often avoid protected areas such as SPAs. This is echoed by organisations such as Natural England and the RSPB that recommend that solar PV developments should not be built on or near protected areas. As sensitive species and habitats are not necessarily restricted to the geographical boundaries of protected areas, it is imperative that research is undertaken into the potential interactions between solar PV arrays and biodiversityespecially sensitive habitats and species. Quantifying the effect of solar PV developments as a function of distance to protected areas is equally as important as it would allow statutory bodies and ecological organisations to provide more detailed guidance on the placement of these developments where the conservation integrity of a protected area is potentially at risk. Research into the impacts that solar PV developments may have on biodiversity should be undertaken using a multiscale approach, allowing potential impacts to be understood both within the immediate vicinity of solar farms and within the wider landscape, taking into account ecologically functionally connected land and a wide selection of habitats.

The solar farm in such proximity to the RSPB nature reserve could cause issues for the high number and diversity of birds in the area. Paper by Natural England 2017 suggests not to build solar farms near protected areas such as an RSPB nature reserve, but research into the potential effects are still ongoing.

Having attended Green Nation meetings during the planning of this solar farm and reading the surveys carried out the information they put forward towards this solar farm is incredibly unrepresentative and they are clearly doing anything in their power to mislead the public and planners to complete the development. For example, when questioned about who would manage

the temporary footpath, they would not give a straight answer even when I questioned them multiple times. I have this recorded if you would like to listen to it. They made much of their proposal to boost the biodiversity on the island however the west end of it is currently left natural as a flower meadow so there will be very little increase in biodiversity by sowing a few more different flower species on it. The rest of the island has a mixture of mature trees and dense undergrowth. The planting suggested around the solar panels will never completely hide the panels when walking alongside the footpath and will transform this typical English countryside with wide ranging distant views into something akin to a city park.

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**Cross Section** 4 Modules in Landscape at 24° tilt



1 2 3m



Project: Noke Solar Farm Location: Land off B4027 Noke Woodeaton Oxford OX3 9TU

scale: 1:50 @ A3

The: PV Module Elevation and Cross Section DWG No.: REV: GN-NK-PLA-03 00