

CPRE, The Countryside Charity, Oxfordshire

Campaigning to Protect our Rural County

Mr James Kirkham,
Cherwell District Council

14th July 2022

By email to james.kirkham@cherwell-dc.gov.uk

Re Noke Solar Farm application 22/01682/F

Dear Mr Kirkham,

CPRE considers that the scale of the damage this development would cause would overwhelm any benefit it might provide and that this application should therefore be refused.

From walking the site, it is obvious that it lies within a wide, low lying, open Green Belt plateau of productive farmland on historic Otmoor, and beside the River Ray. There are extensive views into and across the site from the villages and Oxfordshire Way on the higher surrounding land, and from within the site and its public footpath towards the higher land, the Otmoor villages of Noke, Oddington and Beckley, and towards Islip. The video at <https://www.youtube.com/watch?v=P9KNaY5PFMk> is based on the Manor House at Noke and includes extensive aerial views of the area in which the applications site is situated.

If the development were to be permitted, all the views into the valley would be blighted with inappropriate industrialisation, which it is not possible to satisfactorily shield, and views out of the site and from its public footpath across the countryside and towards the surrounding ridge would be blocked with nine foot hedging – itself inappropriate development in this rural setting.

There would be severe damage to the Green Belt, its openness and to views into and within it, contrary to national and local policy, and loss of productive best and most versatile agricultural land, growing vital crops including renewable bio-mass. The core issue is whether the miniscule gain in terms of renewable energy goes anywhere near offsetting the damage from the development proposed.

1. The Green Belt and Landscape

The site is a model of people's vision of what the Green Belt should ideally be like, open, untouched, productive, agricultural land with extensive rural views into it, out of it, and across it. It is part of Broad Area 3 in the 2015 Green Belt Study in which it was given the maximum assessment for safeguarding the countryside from encroachment.

CPRE's policy is that ground-based solar farms should not be permitted in the Green Belt, where solar energy production should be confined to new or existing roofs.

The NPPF at para 155 notes 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. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".

The 2014 PPG advises that "local topography is an important factor in assessing whether solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominantly flat landscapes as in hilly areas". This site combines both characteristics, being a wide, open, plain surrounded by higher land.

In the Green Belt, the NPPF leaves the local authority to determine the balance between the inevitable harm such development would cause and any public benefit that might arise from the renewable energy it might provide (the very special circumstances).

The NPPF however also requires at para 2 that “applications for planning permission be determined in accordance with the development plan”.

The development plan in this case is Cherwell Policy ESD5. Policy ESD5 has predetermined that renewable energy is a general benefit but that it will be permitted on a particular site ONLY (our emphasis) where “any adverse effects can be addressed satisfactorily” and, in the Green Belt, “particularly visual impacts on openness”.

That therefore is the test to be employed.

It is common ground that the development of a large scale solar farm on a wide open undeveloped site like this would of itself have substantial adverse effects.

The issue is whether these are, or even could be, addressed satisfactorily.

The applicant proposes that existing vegetation, and notably the wooded land beside the River Ray, would in part naturally conceal the development, and in the Design and Access report that this would be supplemented by nine foot high (the height of the panels) evergreen hedging around the site, and on each side of the public footpath through it.

Looking first at the existing vegetation, this provides only partial screening, in some cases filtering rather than blocking views, in summer and, being deciduous, effectively no screening at all in winter. Even in summer it will not block views from higher ground surrounding the site as the angle of sight towards the panels will often be above the vegetation.

Secondly, the applicant acknowledges that the hedging within the site will take ten years to become effective, that is, to grow to a height and density at which it would shield the panels from nearby, including from the right of way. During that ten years it will have minimal value, and after it, even when fully grown, it will have no significant effect in shielding the panels from views from higher ground, the hedging being little higher than the vast expanse of panels themselves.

Meanwhile it will cause visual harm of its own in other ways.

Formal evergreen hedging is not only in itself alien and inappropriate in a deciduous countryside, but viewed from higher land would accentuate the urban nature of the project whilst doing nothing to conceal it. Conversely it would entirely eliminate the present wide views from the public right of way, effectively confining walkers to a green tunnel, instead of the wide vistas of waving grain and hilltop villages they now enjoy.

To some extent these effects could be reduced by choosing loose deciduous hedging rather than suburban evergreen, but then the panels would not be concealed at all for the winter months, half the year, from the footpath within the site.

The acknowledged adverse effects of the development on the Green Belt and on landscape views are therefore not addressed satisfactorily.

Given the “bowl” within which the development is located, and the higher viewpoints surrounding it, they are almost certainly not capable of being satisfactorily addressed. Therefore the application must be refused in line with Cherwell Policy ESD5.

Little if any weight should be given to the fact that the application is for temporary use, as forty years of blight is more than a whole generation.

In any case, there is every likelihood that at the end of the term permission would be renewed if the site was in viable production. In any case granting permission for this industrial use could set a precedent for other applications.

2. Agricultural Land Value

The applicant assesses the land as being in small part Best and Most Versatile Grade 3a with the larger balance being 3b, the half grade below. The difference between the two sub-grades is narrow and subjective. The Welsh Government describes it in the following terms:

3a Moderate to high yields of narrow range of arable crops (e.g. cereals), or moderate yields of grass, oilseed rape, potatoes, sugar beet and less demanding horticultural crops. 3b Moderate yields of cereals, grass and lower yields other crops.

The site is presently and obviously growing high yields of cereal, and of bio-mass linseed.

The applicants have assessed the site as primarily 3b on their consultant's incorrect assumption in the Land Quality Report that flooding would preclude spring sowing.

The actual farmers of the land however 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 these fields. 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'.

It is therefore strongly arguable that the grade of the site has been under-estimated in the application, and that a greater part of it, if not the majority of it, has the characteristics of Best and Most Versatile 3a.

Be that as it may, it is obviously in high yield production of important crops including wheat, of which there is a world-wide shortage, and linseed which is a bio-mass crop which is itself addressing carbon neutrality.

The applicants advance the claim that agriculture will continue as sheep grazing will graze amongst the panels. Not only is sheep grazing Grade 5, the lowest grade of agricultural use where no other use is possible, but contrary to a carbon neutral strategy as a reduction in meat consumption is part of the adopted Pathways to a Zero Carbon Oxfordshire.

The proposed development will remove a large swathe of productive land from agricultural use. Para 174 of the NPPF encourages decision makers to "conserve and enhance the natural and local environment" including by "recognising the economic and other benefits of best and most versatile land". Due to the applicant's land classification error, the site is likely to be predominantly 3a, best and most versatile, rather than 3b, as claimed by the applicants. Any balance is no lower than 3b, on the cusp of best and most versatile.

Whatever the classification it is a fact that it is in strong and successful production of globally important crops, including linseed bio-mass which itself assists Climate Emergency targets.

3. Provision of Renewable Energy.

The assumption in favour of renewable energy is already included in the development plan policy ESD5, provided that its provision does not create adverse effects that cannot be addressed satisfactorily, so its quantum is not directly relevant to the planning balance.

However, the District has recently adopted a Climate Emergency resolution with an objective of energy supply across the District as a whole being zero carbon by 2030.

It is therefore relevant to consider what we believe to be the very minor extent to which the development might have assisted in that objective

The capacity of the site is variously claimed to be 25 megawatts and 26.6 megawatts, although these figures are the maximum capacity of the panels on the longest and sunniest day that they might experience, wherever in the world they might be located, and then only when they are new.

The applicants acknowledge in their Network Availability Assessment that the capacity of the panels will halve over the forty years proposed.

Output is constrained by the capacity of the grid connection to 18 megawatts but this is again a maximum unlikely to be achieved with any frequency, and could never be reached after the capacity of the panels fell below it in twenty years or so.

It will be extremely rare that even the longest and sunniest day on Otmoor approached the maximum capacity of the panels, and a mid winter day has only a seventh of the irradiation of an average mid-summer one.

That means that there will be far less renewable energy during the winter than the summer, albeit winter is the time of maximum demand for heating.

The solar industry expresses the output in terms of “homes powered”, in this case 7,000, which expresses the expected actual electricity output from the site in terms of multiples of the average annual electricity usage of a typical home.

The zero neutral objective is however concerned not just with electricity, but with all energy. More than two thirds of the energy that “powers” an average home is not electricity but gas, or, in the countryside, oil.

That means that the output from the solar farm actually “powers” the equivalent of 2,000 homes, not 7,000.

2,000 homes is 4% of Cherwell’s current housing stock, but it is not 4% of Cherwell’s energy usage.

Typically only a third of all energy is used in homes, the rest in transport, offices, factories and elsewhere. That means that the Noke solar farm – even if the claimed output was correct – would provide only 1.3% of Cherwell’s energy needs.

Additionally in their Network Availability Assessment the applicants say that by the end of the forty years of use the panels capacity and therefore output would have deteriorated from 25 megawatts to 10. That would mean that by the end of the permitted forty years they would be meeting less than 0.52% of the District’s current energy needs.

On top of which, the energy use of the District will have grown over the same period. At the current rate of housing completions for instance, 1,000 a year, there could be 40,000 more households, and therefore employment, and energy use, reducing the 0.52% to 0.28%.

Looking so far ahead these calculations are necessarily subject to wide margins of error, but are illustrative of the actual extent to which the Noke development would meet Cherwell’s renewable energy needs.

In achieving net zero, it may be said that “every little helps”, but the help from the Noke development would be very little indeed in relation to the damage it would create to the Green Belt, the countryside, and people’s enjoyment of it, and to agricultural production, some of which is itself renewable energy in the form of biomass.

4. Other issues

a. Heritage and footpaths

There are concerns about the impact on heritage assets. The entry to St Andrews Oddington would be marred in winter by side views of the solar farm through the bare tree branches and views of listed Logg Farm would be similarly compromised.

General views of St Nicholas at Islip from the higher land would be blighted by the solar farm background and views from within the site would be marred by the tall and inappropriate evergreen hedging, even though it is understood the applicant intends to leave one sight line clear.

Views from the Oxfordshire Way over the presently open countryside would be compromised.

b. Bio-Diversity

If sheep are to be grazed amongst the panels, due to sheep's proclivity to eat almost anything, there will be little bio-diversity in comparison to that in the present agricultural use.

The fields presently have wide wildlife borders and the present woodlands beside the River are already wildlife friendly.

It is proposed to leave a small corner of one field (outside the application site) uncultivated, but local opinion is that this will not offset the impact of the solar panels on the developed site, not least in blocking the sunlight on which life depends.

There is concern at the potential the effect on the adjacent RSPB reserve, especially as rare cranes are now nesting. Hopefully you will ensure that RSPB are consultees.

5. Summary and Conclusions

The proposed solar farm would have a highly damaging impact on a glorious open rural landscape; on the Oxford Green Belt; and on the production of vital crops, including bio-mass.

The resulting generation of renewable energy would be effectively insignificant in relation to the District's net zero objective.

Permission for a development such as this, in this place, would be demonstrably contrary to both Council Policy and the wider public interest.

CPRE urge that this application be refused.

Yours faithfully



Michael Tyce

Executive Committee Member

