

From:

Sent: 14 July 2022 21:36

To:

Subject: Objection to Planning application 22/01682/F

Dear Mr Kirkham,

I am writing to express my strong opposition to the proposed solar development at Manor Farm Noke (planning application 22/01682/F) for the following reasons:

1) It is in the Green Belt.

2) The totally unacceptable adverse impacts this application would have on a priceless rural landscape located within the Green Belt in close proximity to Otmoor. I am sure the arguments for this have been eloquently described by others so I will try to avoid going over the same ground. As an Oddington resident I fully subscribe to the objections put forward in the comments made on behalf of Oddington village. We should consider ourselves custodians of this this unique and valued rural location and take responsibility to protect it for the future.

3) The significantly misleading information used in the many of the Green Nation consultation documents, especially in relation to the value of the agricultural land and it's soil quality, and biodiversity.

Green Belt

As I am sure you are aware, the Government's National Planning Policy Framework states that: *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Additionally, 'When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development'*. This development simply cannot be justified in this location.

Significant adverse visual impacts

The Renewable Energy Hub UK (<https://www.renewableenergyhub.co.uk/blog/everything-you-need-to-know-about-solar-farm-requirements/>) states that 'The prime spots for solar farms are either on flat land or on a south facing slope' and 'Planners will encourage the development of brownfield and previously unused land wherever possible'

This proposal does not fulfil either of those criteria. The northern fields of the site rise up from the River Ray as one walks southwards and thus these fields have a north facing aspect. This is far from ideal as a solar location and as a result the height of the top of the panels need to be excessively high (2.8m) in order for the panels themselves to be orientated to the south. Green Nation make much of the 'screening' they propose in order to hide the panels from view. Their photomontages are misleading representation of the current landscape and, having looked closely at some of their planting plans I have serious doubts that screening of any significance will be achieved in the timescale described. I also lack confidence in their understanding of the amount of ongoing maintenance their ideal scenarios will take to achieve. Planting narrow strips of wildflower meadow mix between a native hedge and a security fence, or under shrubs, as proposed (Detailed Soft Landscape Proposal documents), is never going to be viable to maintain longer term. The scenarios depicted in the Illustrative Landscape Sections A C document look perfectly acceptable for a city park but are out of place here and are far removed from our valued and far-ranging rural vistas. These unrealistic planting scenarios are used to evaluate their biodiversity enhancement proposals. Even if

screening such as is proposed were achievable, it will in no way compensate for the loss of the wide, open vistas which are characteristic of the area.

Additionally, no amount of screening will hide this desecration of the landscape from surrounding higher land. It will be clearly visible from the Islip to Noke section of The Oxfordshire Way footpath. This path is detailed in a downloadable document on the Oxfordshire County Council website as a point of interest

(<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/environmentandplanning/countryside/walksandrides/oxfordshireway/OWpoi.pdf>). *'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.'*

If this huge proposal were to be permitted it would be a visual blight on the wide unspoilt panorama walkers are currently able to enjoy.

Quality of Agricultural land

The Government guidance on solar installations (<https://www.gov.uk/guidance/renewable-and-low-carbon-energy#solar-farms>) states:

'Particular factors a local planning authority will need to consider include:

encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;

And 'where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land'

Green Nation have done their best to paint this farmland as of poor quality, yet the fact remains that it is in fact valuable agricultural land which produces good yields of a variety of crops, both autumn and spring sown, including milling wheat, oil-seed rape, beans and linseed. Interestingly there are soils under the same ownership which are more challenging to farm (those to the far west and far east of the site) but these are not being included in this proposed development. This causes me great concern because if development in this productive arable location is permitted then, in my opinion, a precedent will have been set and there will be nothing to stop further development on the lesser value agricultural land,(despite assurances in the Consultation Statement that there are no plans for this at present.

I would like to draw your attention to how the farm was described just 3 years ago, on sales particulars https://assets.savills.com/properties/GBOXRASUS180261/SUS180261_SUS18004046.PDF as 'productive arable land' and bounded by 'mature hedgerows'. Please use the link to view the aerial photographs showing the crops growing well and the beautiful distinctive open landscape of the Otmoor area.

Recent global events have highlighted the need to at least maintain, if not improve, our national food security so to take agricultural land out of production at this time is foolhardy and shortsighted. The recent Government Food Strategy policy paper includes a stated aim to *'maintain the current level of food we produce domestically'*.

On Green Nation's own website they state that '*Sites should ideally be brownfield land, or low-grade agricultural land*', yet they classify the land at Noke as Grade 3 (good to moderate) agricultural land which goes against their stated aim.

The Agricultural Quality of Land Report commissioned by Green Nation states attempts to downplay the agricultural value of this land:

Para 3.6 'Wetness is the main limitation on the land in the north and east of the site. The combination of a moderately high topsoil clay content and imperfect to poor drainage means that this land will be too wet to cultivate in spring, limiting arable use of the land to autumn-sown crops'.

This is untrue as the land successfully grows spring crops, especially with the use of our direct drilling techniques which minimise soil disturbance. The reduced number of passes over the soil with this type of farming limits any compaction and saves fuel. In dry summers such as we are experiencing this year any extra soil moisture is of huge benefit to the growing crop.

Para 3.7 'Also included is most of the land in the south-west, which has shallow stony soils over hard limestone bedrock. The combination of stony soils and shallow rooting depth means that under the local climate this land does not supply adequate moisture reserves to support crop growth, and average yields of cereals are likely to be low'.

Another untrue statements as cereal yields on this land are not low, in fact they are at least average, and often above average. Use of a direct drill minimises soil disturbance which in turn maintains soil moisture and over time will improve the soil structure and organic matter.

In the Consultation Statement document, it is stated on that '*For clarity, regarding specific queries related to the plausibility of sheep grazing at the Site, the landowner and agricultural tenant have confirmed that sheep grazing can and will take place at the Site as part of the ongoing use of the Site in conjunction with the solar farm.*' I would like to further clarify this statement and say that although the possibility of sheep grazing beneath the panels was discussed with the share farmer, to my knowledge there is no agreement in place to confirm that this will occur.

Biodiversity

Green Nation make much of their 'green' credentials and claim that they will improve biodiversity yet not a single photograph currently (14/07/2022) on their website demonstrates this. The solar panels pictured stand over a monoculture of grass with no evidence of additional 'biodiversity enhancement' planting of any sort. <https://greennation.co.uk/>

One of Green Nation's supporting documents, Manor Farm - Ecological Appraisal March 2022.pdf, states on p11: '*This is largely in intensive agricultural management with very few field margins over 1m. During the surveys, most of these were either bare having recently been ploughed or stubble with brassica growth*'. I dispute this information; the land has not been ploughed for at least 7 years and almost 50% of the proposed solar area currently has field margins of over 1m. This is yet another example of attempting to downgrade the current land value. It is hard to place any faith in an ecological assessment that can't distinguish between ploughed land, recently drilled land and land left undisturbed overwinter for the benefit of soil and wildlife.

Green Nation's headline biodiversity increase (of 50% 'habitat units') which they propose to achieve here is also misleading as the increase is overwhelmingly made up of the switch from 40 hectares of cereal crops to a similar area of grassland which will grow under the panels. (see Manor Farm Noke. Biodiversity Metric.xlsx).

Looking to the future, without solar panels on this land I believe it will be possible for biodiversity gains to be made, whilst still producing food, by participation in the new Government Environmental Land Management Schemes (ELMS). The first of these, the Sustainable Farming Initiative (SFI) opened this year, and in the future there will be Local Nature Recovery and Landscape Recovery schemes. These future opportunities will be lost if the land is covered in solar panels.

It is interesting to note that their commissioned ecological surveys (Ecological Appraisal Report by BSG) were conducted at times of year '*outside the optimal period*' to show the site in the worst possible light. An example of this is demonstrated by the fact that the document states that only a single brown hare was seen, whereas I and other local people who walk the area regularly, and at all times of year, know that it is home to a thriving number of brown hares. The report notes that although there are no badger setts on the site, '*the field margins, hedgerows and woodland, and to a lesser extent the arable land, offer suitable foraging for this species*'. In fact, the footbridge over the River Ray on the Oddington to Noke footpath is regularly used by badgers from multiple setts on Logg Farm as a river crossing point for their nightly foraging on the Noke side of the river. The fences enclosing the proposed solar installation would seriously impact the foraging area of these badgers by excluding them from the open fields they currently traverse and thus confining them to field edges and footpaths.

In conclusion

I do not dispute the fact that we have a global energy crisis which needs addressing, but food security is equally as important and I believe it should not be compromised by landowners seeking profit under the guise of being 'green'. This land was not selected by Green Nation themselves as it is not an ideal location for a solar farm. In my opinion all their many supporting documents have been commissioned in order to make the site appear to be an acceptable location for this development, when in fact it is not.

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'.

I believe this proposal, despite the best efforts of the proposers, has very many adverse effects on the area, none of which can be addressed satisfactorily. I therefore urge you to reject the application.

Yours sincerely
Heidi Smith, PhD

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