

Objection from Save Otmoor

I represent the campaign group Save Otmoor, originally formed to submit evidence to Highways England during the consultation period for the Oxford-Cambridge Expressway. Our parliamentary petition attracted over 10,000 votes from 594 constituencies, giving some idea of just how important Otmoor is as a national, as opposed to a purely local, resource.

Otmoor is best thought of as a series of concentric circles, like a dartboard. At the centre is a 22 hectare reedbed, the largest in the region, around which is the nature reserve, mostly flooded grazing marsh. Around that are mostly damp meadows, many of which have been voluntarily managed for conservation by landowners since being designated an Environmentally Sensitive Area (ESA) in 1995. Around that in turn are the historic 'seven towns of Otmoor', of which Noke is one, and finally there are fragments of a ring of ancient forest, the remains of Bern Wood, a Norman royal hunting area. Protecting all of these circles is important, as they are all interdependent and form one fragile landscape, but they become increasingly important the closer they are to the centre. Thus flat wet farmland north of Noke, yards from the River Ray, especially needs to be protected in its pre-industrial form, in order to maintain the unspoiled uniqueness of this entire historic landscape.

That this application is not sited in any of Otmoor's many SSSIs or in the RSPB nature reserve is largely irrelevant – it is all of Otmoor that jointly comprises the landscape, the importance of which is far greater than the sum of its protected parts. The District Councils which control planning across the moor and its environs therefore have a special duty to work together to preserve and enhance it.

In addition to this overarching point, we have four specific objections:

- the impairment caused to the unique historical atmosphere of the Otmoor landscape for walkers and other recreational users
- the impairment to one of the most important and accessible public views of Otmoor from the B4027 at Noke Hill
- the impairment to any future expansion of the managed conservation area
- the currently-unquantifiable potential for risk to wildlife

Impairment to a unique landscape

Otmoor is known as a haven for wildlife, but it is also a haven for people. In addition to birdwatchers, the eerie, silent quality of remoteness that Otmoor conveys attracts walkers, riders, cyclists, artists, writers, photographers and many others to enjoy this wilderness just a short distance from Oxford City Centre.

John Buchan used Otmoor's landscape as the setting for his novels *The Blanket of the Dark* and *Midwinter*. But his most evocative description comes from *Memory Hold-the-Door* (1940):

Otmoor is divided by rough hedges, but it is undrained and perhaps undrainable. In a wet winter it is one vast lagoon: in summer it is a waste of lush grass, and a few mud tracks are pitted and ribbed like the seracs of a glacier. Once it was the preserve of the Seven Towns of Otmoor which pastured their geese on it, and there were riots early in the last century when it was enclosed. Now the Royal Air Force has a bombing-station there, and by day it is apt to be a noisy place, but at night and in wild weather it recovers its loneliness. To ride or walk there in an autumn twilight is to find oneself in a place as removed from man as Barra or Knoydart.

Other writers inspired by Otmoor include Evelyn Waugh, Aldous Huxley, Robert Graves, RD Blackmore, AE Coppard, JRR Tolkien and Susan Hill. But these famous names are simply the tip of the iceberg. An online search reveals many thousands of amateur poets, bloggers, memoirists, photographers and painters who have been touched in some way by a visit to this magical, untouched region, a semi-wilderness of landlocked fenland marsh somehow preserved unchanged through the centuries.

Otmoor's unique landscape, and in particular its historical integrity, was the deciding factor in the route of the M40 motorway. Following a Public Enquiry in 1985, the Inspector found that it was "an historical and unique setting":

I accept the DTp's contention that there are other matters to take into account besides landscape, but in an area where there are extremely important historical landscapes, ancient forests, SSSIs, and rare species of flora and fauna which need conservation then the landscape situation in my view becomes of paramount importance...

Ot Moor and the Bernwood Forest Complex in my opinion constitute the most important landscape setting affected by the whole route of the motorway. I accept the evidence of the conservation and entomological organisations that these areas should be avoided in order that conservation of an historical and unique setting (Ot Moor) and other wildlife habitats are preserved and not disturbed... [It would be] an unacceptable intrusion into, and destruction of, a coherent landscape setting with its surrounding villages.

Footpaths across Otmoor, which has been uncrossed by any road since Roman times, are relatively scarce, so the footpath and bridleway across and alongside the proposed site are particularly important, as is the nearby section of Oxfordshire Way. Walking between or in parallel to 2.1M high chainlink security fences, topped by 3.2M CCTV cameras guarding tens of thousands of 2.8M high solar panels, and accompanied by the noise from inverters in an otherwise tranquil environment, is inevitably going to colour the experience negatively for any visitor, while the proposed associated infrastructure is completely incongruous with a landscape in all other respects almost unchanged since Buchan's day.

The applicant's landscaping scheme shows they hope to mask some of the infrastructure by enclosing walkers within lines of trees 2.5M high on either side – even if they achieve this in

a reasonable timescale, they will have fundamentally altered the current experience of walking on Otmoor, which is to enjoy far-reaching open vistas of flat fenland. In fact, the landscaping will be an impairment to the landscape in its own right, blocking and impacting on views from the eastern side of the Ray towards Noke Hill that are currently open.

Otmoor is a jewel in Oxfordshire's crown, and with any application relating to it, the first question should be 'How does this proposal enhance it?' This one clearly does not.

Impairment to the most important public view of Otmoor

Lewis Carroll is said to have been inspired to create the chessboard landscape of *Through the Looking-Glass* by the view of Otmoor from Noke Hill (the President of Magdalen College, a relative of the Liddell family whose daughter was the inspiration for Alice, lived in Noke at the time).

They walked on in silence until they got to the top of the hill. For some minutes Alice stood without speaking, looking out in all directions over the country – and a most curious country it was. There were a number of tiny little brooks running straight across it from side to side, and the ground between was divided up into squares by a number of little green hedges that reached from brook to brook. "I declare it's marked out just like a large chess-board!" Alice said at last.

This is still the biggest and most breathtaking view over Otmoor, stretching some ten miles to the north-east, and the one afforded to the greatest number of people as they pass by on the B4027 between Beckley and Islip. The proposal would site the solar utility in the foreground – the only post-industrial feature that would be visible. It would also be a dominant and intrusive feature in the public view of Otmoor from the Common Road approach to Beckley.

Ecological importance of the wider landscape

The ecological importance of the moor has been confirmed by study after study, and applies to all of Otmoor, not just the nature reserve. A 2008 World Wildlife Trust report to Defra about the much larger Environmentally Sensitive Area designation (McInnes et al, *Management of the Otmoor protected area, NR0112*) noted:

The Otmoor protected area [ESA] covers approximately 1100 hectares of Oxfordshire farmland. The site represents one of the most important wetland areas in central-southern England

Wildlife Trusts says:

Once awash with wildflowers and alive with insects, our floodplain meadows have been drained, damaged and destroyed; now, only 1,600 hectares of these precious habitats are left in the whole of the UK...

The ecological survey commissioned by the applicant found few rare species of either flora or fauna on the site – but if the land were to be actively managed for conservation in the future, there is certainly ample scope for those species to spread from neighbouring farms and from the reserve. Uncommon insects found on Otmoor meadows where they are able to eat a particular food plant include the sawfly *Hartigia xanthosoma* on meadowsweet, the buprestid beetle *Trachys troglodytes* on Devils-bit Scabious, the longhorn beetle *Agapanthia villosviridescens* on marsh thistle, and the forester moth *Adscita statice* on common sorrel. (Source: World Wildlife Trust).

The ground beetle *Badister meridionalis* is only currently found in the UK at two locations: Otmoor and the surrounding area, and part of the Somerset Levels. (Luff, 1998). In 2009 the water beetle *Enochrus nigritus* (IUCN red list 'Vulnerable') was found in Greenaways field, as part of a survey by Dr Martin Drake that identified twenty-one nationally scarce or rare aquatic species in that location alone.

Uncommon, rare and protected butterflies found on farmland outside the current nature reserve include White-letter Hairstreak (UK red list 'Endangered'; UK BAP; NERC S41); Purple Hairstreak; Brown Argus (rare in farmed environments); Small Heath (UK BAP; NERC S41), Purple Emperor and White Admiral (both local BAP species) and Black Hairstreak. (Source: Butterfly Conservation Upper Thames Branch records).

Otmoor is especially rich in rare hymenoptera (bees and wasps). This includes eight species new to science and described from Otmoor specimens, two species new to Great Britain, and five species that were recorded in fewer than three sites globally (source: Otmoor M40 enquiry submissions). The Variable Damselfly is another uncommon species only found in Oxfordshire on Otmoor and near to Abingdon. At least 17 other species of dragonfly have been found around Otmoor, including the only Oxfordshire colony of hairy dragonfly, listed by Defra as 'nationally scarce'.

With regards to flora, the ecological consultant Dr Judith Webb highlights in particular the fen violet *Viola stagnina*, which is on the national red list of endangered species as well as the rare plants register, and is protected under Schedule 8 of the Wildlife and Countryside Act 1981; Otmoor's is the only significant population in the whole of the UK. Other red list or RPR species include true fox sedge *Carex vulpina*, downy sedge *Carex filiformis*, meadow thistle *Cirsium dissectum*, long stalked yellow sedge *Carex lepidocarpa*, flea sedge *Carex pulicaris*, tubular water dropwort *Oenanthe fistulosa*, tawny sedge *Carex hostiana*, tormentil *Potentilla erecta*, quaking grass *Briza media*, and lesser spearwort *Ranunculus flammula*. Three species of orchids are found locally, including the green winged orchid.

Otmoor has also been designated an Important Stonewort Area (ISA) by Plantlife. Tassel stonewort, which grows in the Otmoor basin, is found in only eighteen other sites in the UK. It is a BAP priority species and part of English Nature's Species Recovery programme.

The WWT report to Defra quoted above concludes:

The RSPB has considerable ambition for Otmoor. The reserve is one of the largest projects restoring arable land to wetland anywhere in the UK. Over the

*next 25 years the RSPB's vision is to see the full suite of lowland wetland habitats restored in a mosaic, enabling colonisation by species such as bittern, marsh harrier *Circus aeruginosus*, bearded tit *Panurus biarmicus*, black-tailed godwit *Limosa limosa*, spotted crane *Porzana porzana*, otter *Lutra lutra* and marsh fritillary *Euphydryas aurinia*.*

The RSPB intends that the reserve will become a flagship demonstration site, being used regularly for advisory and education by a wide audience, particularly covering wetland restoration and management. The intention is that the local community will cherish Otmoor as a valuable resource for recreation, learning and a means to enhance their quality of life...

This long and extraordinary list of Otmoor's current and potential biodiversity is not just cited here for its own sake – if the application were successful, it is highly unlikely that future owners of the site could be persuaded to remove the infrastructure in order to turn it into wetland, say, or participate in wider efforts to add to the mosaic of biodiversity referred to above, which might for example involve annual flooding. Thus a valuable opportunity to prioritise conservation in the future would have been lost.

Effect on migrating birds

Unfortunately, little research has been done on the impact of utility-scale solar plants on wildlife, let alone wetland migrating birds like those that overwinter on Otmoor in large numbers. It is known that bird deaths can occur disproportionately in the vicinity of such plants (Walston et al, 2016), and it has been widely theorised that birds may mistake them for water, as many respondents to the plans have noted. A 2017 report to Natural England (*Evidence review of the impact of solar farms on birds, bats and general ecology, NEER012*) concludes:

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 biodiversity, especially 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.

In the continuing absence of a solid body of high-quality evidence to the contrary, this precautionary approach continues to make good sense.

Conclusion

Whether an application meets the 'very special circumstances' threshold or not has to take account of at least two factors: whether or not the same amount of PV power could potentially be generated elsewhere, but also the quality of the landscape it will degrade. In a very special landscape, the threshold has to be interpreted significantly higher.

It is hard to think of a more important landscape in Oxfordshire than Otmoor, or one which commands wider national affection or support. In the application the applicant highlights a number of solar installations already built in Green Belt, such as the much smaller one in Yarnton, but this misses the point – none of those applications were in a location as sensitive as Otmoor, where man-made intrusion into a historic and tranquil landscape would change it fundamentally. Nor are the many local objectors nimbys: when your backyard is Otmoor, you are the custodian of an extraordinarily precious national asset, and it is no surprise that so many local people feel driven to protect it.

Otmoor's importance certainly goes far beyond its current statutory and non-statutory protections, such as Green Belt and Conservation Target Area. That this application has got as far as it has underlines the urgent need for initiatives such as the current one to make it the centrepiece of a National Park, or the BBOWT /Buckinghamshire Council proposal 'Reconnecting Bernwood, Otmoor and the Ray'. In the meantime, existing planning bodies should use existing powers to protect it, and the application should be refused.