

22/01682/F – Planning Application Land North of Manor Farm Noke

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.

Beckley and Stowood Parish Council oppose and object to this planning application for a solar farm in the Green Belt at Noke covering 43.78 Hectares 108.18 acres with 47,300 solar panels next to important wetland Otmoor RSPB reserve and SSSI. Our parishioners put protection of the Green Belt as their highest priority and no 'very special circumstances' can be demonstrated for siting a solar farm here.

1. Protection of the Green Belt

NPPF 151 states - *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.*

No such 'very special circumstances' exist in this case to build an industrial development covering 43.78 H/ 108.18 acres in Green Belt countryside and productive agricultural land. With a national grid a solar farm could be put anywhere where it does not threaten Green Belt countryside. Generation of solar energy is much more appropriate on new developments and retrofitting to existing roofs both in housing and industrial buildings.

1. The NAREC report states that no substation in Cherwell District has the capacity to take the input from this solar farm. The only one that does is the Headington substation located at Barton Park within Oxford City boundaries. If this solar farm is built at Noke it may delay and compromise any other solar farms on more suitable sites within Oxford City itself and surrounding districts.
2. Too much of the Oxford Green Belt to the east of the City has already been destroyed. Cherwell District has already lost 273 Hectares/ 676 acres of Green Belt land in its Local Plan. This is in addition to that lost in the SODC Local Plan – 770 Hectares/ 1,903 Acres. This land is lost forever to future generations. See appendix 1.
3. Developing this site would be irreparable damage to the openness of the Green Belt countryside. This site is overlooked from the higher eastern part of Noke village itself and from all along the limestone ridge that runs from Islip to Stanton St John and beyond, in particular from Common Road Beckley and Elsfield. It is also overlooked by the Oxfordshire Way which is much used and a footpath runs right through the site and a bridleway around Otmoor very nearby.
4. A planning application for a solar park between Elsfield and Beckley in the Green Belt was opposed by both parishes and rejected by SODC as *"it would erode the openness of the Green Belt and would detract from the landscape setting of*

Oxford and therefore constitutes inappropriate development” P15/S2202/FUL
and continues -

“2. The proposed solar farm would create an incongruous feature in the landscape and would result in an undesirable intrusion of industrial scale and character into an isolated rural setting to the detriment of the character and appearance of the site and surrounding countryside and also contrary to government guidance in the National Planning Policy Framework and accompanying Planning Practice Guidance.” Exactly the same can be said of this planning application.

NPPF 138. Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In this case b, c and d are the most important.

b) The solar farm is between the villages of Noke and Oddington and there is a threat that this development in the Green Belt will allow them to merge.

d) Both Noke and Oddington have their own special historic character which will be adversely affected by this industrial development.

c) The most important issue is that beautiful countryside will be encroached and destroyed. The openness of the Green Belt will be severely compromised and this landscape adversely affected. This industrial development can be seen from a number of higher points east Noke, Beckley and Elsfeld as well as a number of public rights of way – The Oxfordshire Way, the bridleway around Otmoor and the footpath through the centre of the development.

2. Damage to the Environment, Ecology, Wetland and Birds

The proposed solar farm immediately abuts the edge of the Conservation Target Area that covers most of the rest of the Otmoor area and part of Otmoor is a SSSI.

There is also concern about -

- It is a large site covering 43.78 H/ 108.18 acres
- Wetlands such as Otmoor are extremely important and declining habitats that need preserving - <https://www.wildlifetrusts.org/habitats/wetlands> , <https://historicengland.org.uk/research/current/discover-and-understand/landscapes/wetland-heritage/> , <https://www.wwt.org.uk/our-work/threats-to-wetlands>
- Its proximity to the RSPB Reserve on Otmoor, only 420 metres away at its nearest point.
- The distance from the solar farm to the middle of the permanently flooded part of Otmoor is only 1.3 kms.

- The area of the nearest part of the RSPB Reserve at Otmoor is 3.44 km² (c. 850 acres), while the permanently flooded part is only 0.265 km².
- Otmoor is a very important RSPB reserve with breeding cranes and other rare species. The reflective surface of the solar panels could attract birds and insects, as it would appear like water.
- The solar farm is unsightly industrial development and an eyesore comprising -
 - 47,300 solar panels at 2.8 metre (over 9 ft) high, high deer-proof galvanised fencing at 2.1m
 - CCTV on 3.2m poles
 - Substation – 8 x 6 m x 3 m high
 - Spares shipping container – 12.16m long 2.59m high
 - Inverter station – very large on legs no dimensions roughly 18m long (dimensions not given)
 - Welfare container -2.59m high x 6.06m x 2.44m

3. Protection of Agricultural Land

At an Environmental Audit Committee meeting on 29th June '22, George Eustice, secretary of state for Environment, Food and Rural Affairs accused local authorities of disregarding advice on the use of agricultural land for solar farm development.¹

This guidance² “created a strong presumption against solar farms on Best and Most Versatile land, and that is classified in law as grade 3B or above,” he said, and resolved the problem of development on agricultural land for some time.

This land is classified as grade 3a and b and currently and recently has grown wheat, linseed and beans. Development of a solar farm would be contrary to 2015 guidance.

Furthermore, Paragraph 174 of the National Planning Policy Framework requires planning decisions to recognise the benefits of the best and most versatile agricultural land (grades 1-3a.)

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”.

¹

https://www.solarpowerportal.co.uk/news/eustice_says_local_authorities_disregarding_guidance_around_solar_developme?fbclid=IwAR2v5-Ky6zBsV_ZYq08eDQKvOarGXDkfo6TTedATYvCnA0T9esxkquORPr4

² Guidance

Renewable and low carbon energy – 2015 - <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

Linseed is a bio-mass crop where the seeds go to bio-fuel and the stems to heating, and therefore already contributing to Cherwell's Climate Emergency objectives. There is a world shortage of wheat.

4. Public Rights of Way and Walkers

There will be 47,300 solar panels at 2.8 metre (over 9 ft) high; unsightly 2.1m galvanised fencing; CCTV on 3.2m poles; a number of additional buildings to a maximum height of 3m/ 9.84ft and 18m long.

- A much-used footpath from Noke to Oddington crosses the proposed site. At present it is through a pleasant country field. If development is allowed it would be more like an urban alleyway with 2.1m unsightly galvanised fencing and 2.8m solar panels on each side. There are also personal safety issues.
- Both the Oxfordshire Way and the bridleway around Otmoor will be adversely affected by the unsightly industrial nature of the development, spoiling the enjoyment of the countryside.

5. Construction Traffic and Safety of the Public

The developers have stated that construction is to take 12 weeks/3 months and there will be 466 mainly HGV deliveries.

The route proposed will be potential hazardous for ramblers and other users of local footpaths and bridleways and local residents. The proposed route to the site will be along B4027, through the top of Noke village across the Oxfordshire Way then using a track and part of footpath across the site. This is a very real danger to anyone using the footpaths and bridleways or indeed anyone wishing to travel in Noke.

The 12 weeks/3-month time is likely to be very optimistic. The roads in Noke are very narrow and could not accommodate an HGV and another vehicle. We were told by the developers that there would some 'holding bay' for construction traffic to ensure that HGVs within Noke were not allowed into Noke or the site if there was not room. The site of this 'holding bay' was not known, but will adversely affect residents living along or near the route, particularly along B4027.

6. Renewable Energy Output

The developers' information about the energy output is misleading and inflated. The Headington Substation connection cannot accommodate 25MW, the maximum possible output of the solar farm. It is only capable of a maximum of the Headington transformer can only accept 18MW This is measured as maximum output on the sunniest mid-summer day. The developers have stated that the output declines each year by 10%, in which case it would cease to function at year 10.

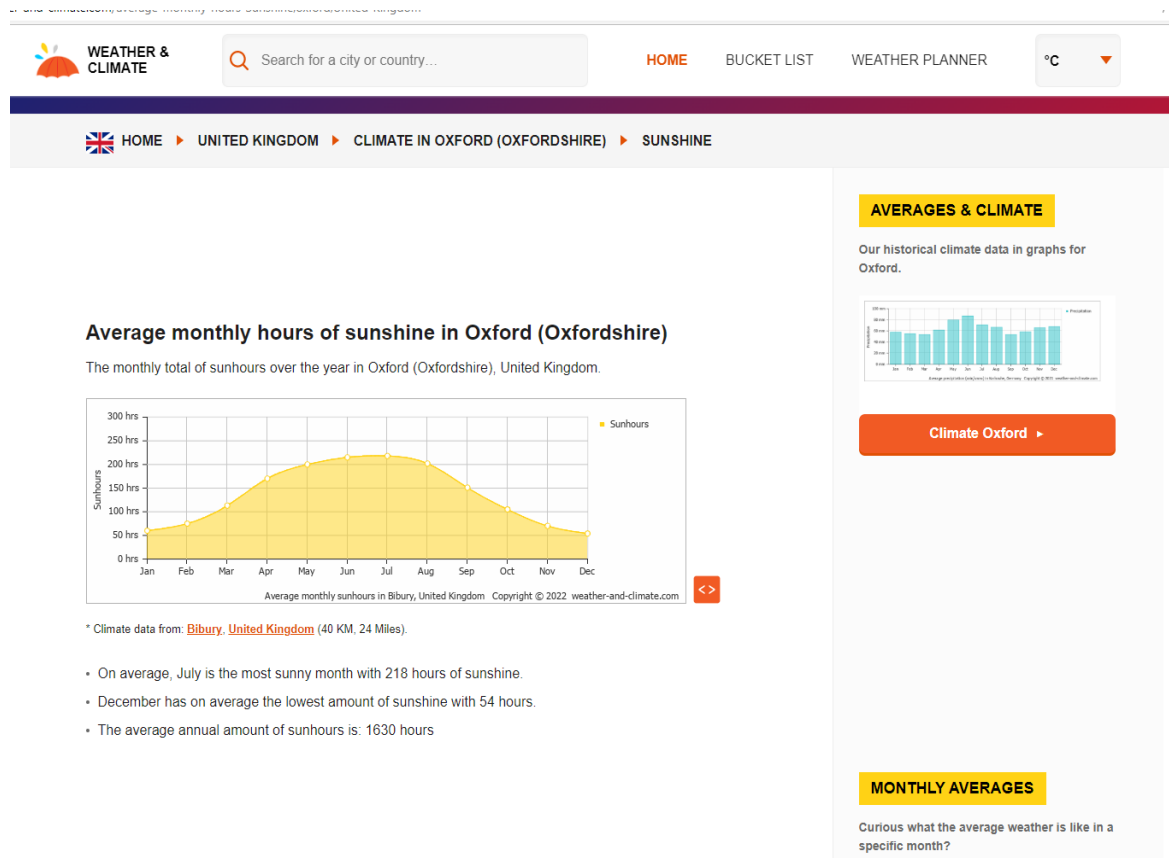
While the hours of sunshine are not readily available for Noke there is some information for Oxfordshire –

“On average, July is the most sunny month with 218 hours of sunshine.

December has on average the lowest amount of sunshine with 54 hours.

The average annual amount of sunhours is: 1630 hours”³

The actual amount of sunshine severely reduces the output of the solar farm from its maximum.



Beckley and Stowood Parish Council declared "an environment and climate emergency" in June 2019 and supports the generation of renewable energy at appropriate sites. However, it opposes this development in the Green Belt, very near the RSPB wetland reserve and SSSI, next to a Conservation Target Area - Otmoor, and important rights of way enjoyed both by local residents and others from further afield.

We have already fought a vigorous campaign to save Otmoor from the Oxford-Cambridge Expressway and will work to ensure to it is safe from other development.

Cllr Ginette Camps-Walsh
Chairman Beckley and Stowood Neighbourhood Plan Steering Group
Beckley and Stowood Parish Council

³ <https://weather-and-climate.com/average-monthly-hours-Sunshine,oxford,United-Kingdom>

APPENDIX 1.

GREEN BELT LOSS FROM CHERWELL LOCAL PLAN

POLICY	LOSS OF GREEN BELT	
	HECTARES	ACRES
Policy PR6a	32.1	79.32
Policy PR6b	31.6	78.09
Policy PR7a	21	51.89
Policy PR7b	5	12.36
Policy PR8	111.8	276.26
Policy PR9	27	66.72
Land adjoining west of the railway - east of PR8	0.7	1.73
Land south A34, west railway line, west of PR6b	11.8	29.16
Oxford Parkway Railway Station and the Water Eaton Park and Ride	9.9	24.46
Land north, east and west of Begbroke Science Park	14.7	36.32
Safeguarded land east A44, north-west railway line	7.8	19.27
TOTAL LOSS	273.4	675.59

LAND LOST FROM THE GREEN BELT IN SODC LOCAL PLAN						
SITE	SIZE HECTARES	ACRES	HOUSE			
Culham Science Park – 77 hectares	77		3,5			
Land Adjacent to Culham Science Centre	220					
Berinsfield – 130 hectares	130		1,7			
Grenoble Road – 153 hectares	153		3,0			
Northfield – 68 hectares	68		1,8			
LnBB – 112 hectares	112	278	1,1			
Wheatley – 10 hectares net, total area 22 H, 12 brownfield	10		5			
Total land to be lost from the Green Belt -	770	1903	11,6			