Comment for planning application 22/01682/F

Application Number	22/01682/F
Location	Land North Of Manor Farm Noke
Proposal	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.
Case Officer	James Kirkham
Organisation	
Name	Mary Stuck
Address	4 The Orchard,Horton Cum Studley,Oxford,OX33 1BW
Type of Comment	Objection
Type	neighbour
Comments	Please register my objection as follows: 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 on 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 or large solar outputs 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. 3. Developing this site would be irreparable damage to the openness of the Green Belt countryside. This site is overlooked from the eastern part of Noke village itself and from all along the limestone ridge that runs from Islip to Stanton St John and beyond, particular to the south 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 - Exactly the same can be said of this planning application. In addition to their comments 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 The solar farm is unsightly and an eyesore. There will be - 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 3 m high

Spares shipping container - 12.16m long 2.59m high - ugly

Inverter station - v 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 Eustace, 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.
This guidance "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 - 1.
The 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.
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".
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 more like an urban alleyway with 2.1m unsightly galvanised fencing and 2.8m solar panels. 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 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 Headington Substation 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 output declines each year by 10%.

Ecological impact: I am particularly concerned about the proximity of the solar farm to the RSPB Bird Reserve on Otmoor, where cranes bred successfully for the very first time last year. The site is also home to bitterns, turtle doves and marsh harriers. The solar farm would be less than 400metres away from the Bird Reserve and only just over 1 km away from the permanently flooded area within it. Wetland birds and insect life are attracted to the large shiny surfaces of water bodies. Over 100 acres of shiny panels could disorient migrating and other birds. The Ecological Survey carried out for the developer concentrated on the wildlife recorded within the solar farm area and concluded that "impacts to any off-site designated sites are highly unlikely due to distances and nature of the work". This is an unsubstantiated opinion for which there is absolutely no evidence at all. Both Friends of the Earth and the RSPB recommend that solar farms should avoid wildlife sites. Green Belt: the solar park would fall entirely within the Green Belt. Para 151 of the NPPF (National Planning Policy Framework) states that renewable energy projects are inappropriate developments on Green Belt land, and should only be allowed in 'very special circumstances' - which I do not believe apply here. Otmoor is no sunnier than any other patch of land in southern England. Electricity can be generated anywhere and distributed everywhere through the existing electrical distribution network.

Amenity value of the area: As mentioned above, a stand-out feature of Otmoor and the surrounding area is its open, undeveloped character, a rare haven for wildlife and humans alike. 108 acres of panelling would subvert its character considerably. If a solar farm is allowed here, in such a unique habitat, solar farms could be allowed anywhere. I welcome solar farms as part of our zero-carbon future. Our challenge is to meet that environmental priority while not trampling on other ones: the preservation of precious landscapes and protection of fragile biodiversity.

Mary Stuck

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Attachments