

Consultee 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	Ecology (CDC)
Name	Charlotte Watkins (Ecology Officer)
Address	Ecology Cherwell District Council Bodicote House White Post Road Bodicote Banbury OX15 4AA
Type of Comment	Comment
Type	
Comments	<p>With regard to the above application - I do not object to the principle of a solar farm of this size and on the largely arable habitat currently present on site. Taking the site alone, most ecological issues could be dealt with through mitigation and habitat enhancement. However, it is difficult to support the proposed location and to view it with anything but concern. From an ecological point of view there would seem to be few places in the district as inappropriate for siting a solar farm as here considering the value of the habitats it is next to. This site is directly adjacent to Otmoor which is one of the largest inland wetland complexes in the country and supports large numbers of priority bird species with nationally important numbers of wintering birds. The concern with solar farms is their potential impact on wetland and migrating birds (and aquatic invertebrates) which may mistake them for water or become otherwise confused or deterred by their presence. Despite numerous studies there is little concrete evidence to reassure that the siting of a solar farm near these environments will not have a detrimental impact. I can find no precedent for a solar farm sited adjacent to a nature reserve with wading and wetland interest. Therefore whilst there is no evidence that there will be an impact on bird, bat or invertebrate populations, I think it would be justified to apply a precautionary approach here and conclude that there is insufficient evidence to show that there will not be any impact.</p> <p>It is generally advised that whilst renewable energy sources are encouraged they should not be sited close to protected areas for biodiversity. The RSPB guidance (Solar Power RSPB policy briefing, May 2017) concluded that they were 'supportive, at the current scale of deployment, unless there are site-specific concerns. Concerns are most likely when located in or close to protected areas, or close to water features where development could pose risks to aquatic invertebrates'. Adjacent to Otmoor would seem to fit into this type of site-specific concern. Natural England 2011 (NE technical information note T/N101, Solar parks: maximising environmental benefits) states there is potential for solar panels to have negative ecological impacts in areas of high wildlife value or close to protected or designated conservation sites.</p> <p>This aspect 'the impact on adjacent protected sites and the species using them - has not been assessed by the applicant and I would have expected it to be considered further.</p> <p>Should the solar farm be sited in this location and at this scale however I would have the following recommendations:</p> <p>The site currently supports a number of farmland birds including red list species (skylark) for which no particular mitigation is proposed. We have an obligation to have regard to the conservation of these species and therefore I would request that a mitigation plan for this and other species using the site is included within the conditions. This may require the need for enhanced management of farmland off site. I do not concur that the numbers are too low to warrant mitigation, displacement is not a satisfactory form of mitigation. When put together with the important waders species which use the fields sporadically for foraging this is a substantial loss of resource for some priority species.</p> <p>The Ecological report suggests that a licence will be sought for GCN and that they may pursue the district licence route. Where this is the case, they need to be accepted onto the</p>

scheme prior to permission being granted to ensure the correct conditions are included within the permission. Where they plan to pursue the traditional licensing route they should make clear the steps they will take and any mitigation that will be proposed as we are obliged to assess whether a licence is likely to be obtained.

The ecological report suggests lighting will be used on site (dormouse section) however this should be clarified and omitted wherever possible. Even lighting on a motion sensor can cause lighting to be triggered frequently by wildlife which would be unacceptable in this location in proximity to ancient woodland and the other sensitive sites for bats and nocturnal species.

Any fencing proposed should be permeable to wildlife and as minimal as feasible. The 2.1m fence proposed here would be unusual in this landscape and may impact low flying wildfowl.

The RSPB have recommended the measures necessary for reducing the risk to wildlife from polarised light are included within a condition. The reduction of polarised lighting pollution and whether this can be achieved is vital in making the overall proposals at all acceptable and therefore I do not think this aspect should be left to condition. The applicants should show how these measures can be accommodated and achieved prior to permission being granted. Where this needs to be part of a bespoke design we need to ensure this is possible on site up front. I would like to request further information on what is intended therefore in this regard.

The RSPB have included within a suggested condition the obligation for the RSPB to be included within decisions on the design and management options for the site. I am fully supportive of this, with the organisation's knowledge of the area and species dependent on it this will be of significant value, however I would suggest that the part 'including management regimes for these features for a period of no less than 10 years' should be changed to management for the lifetime of the solar farm. Throughout the suggested condition 'ten years' is referenced and this should be altered as management of the sites retained and created habitats will be needed ongoing.

Net gain - the applicants metric shows a proposed net gain of over 50% for habitats could be achieved on site. This would be welcomed but the condition scores for the habitats need justification and it is not clear whether they have included areas under solar panels within their calculation and whether they recognise that these areas are likely to remain in poor condition due to lack of light. The grassland proposed on site is a generic improved grassland for grazing. Where possible a more species rich grassland should be used to maximise ecological benefit on site.

Please do get back to me with any queries
Kind regards
Charlotte

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Attachments