Rachel Tibbetts

From: Planning
Sent: 21 August 2022 18:48
To: DC Support
Subject: FW: Objection to Planning application 22/01682/F

From: [redacted]
Sent: 20 August 2022 21:02
To: James Kirkham <James.Kirkham@Cherwell-DC.gov.uk>; Planning <Planning@Cherwell-DC.gov.uk>
Subject: Objection to Planning application 22/01682/F

Objection to Planning application 22/01682/F

Dear Mr Kirkham,

Last month I emailed you with comments pertaining to my opposition to the proposed solar park at Manor Farm, Noke. We own and farm land adjoining Manor Farm, and have farmed the whole of Manor Farm under a Contract Farming Agreement for over 20 years.

I note that, in response to objectors' comments, you have taken further advice on the land quality from soil specialists at Natural England. In their response to you it is likely that they referred to the standard soil maps available. I would like to point out that these are dated, provisional, and lack detail.

This paper https://soils.org.uk/wp-content/uploads/2022/02/Soils-and-Land-Quality-Jan-2022.pdf published in January 2022 by the British Society of Soil Science provides interesting information how these national soil maps came to be adopted and so widely used, despite their significant limitations. These soil maps were originally published by MAFF as 'provisional' in the 1960's and identified the 5 grades of agricultural land which are so widely used today.

MAFF stated at the time, in their accompanying booklets, that the grade of parcels of land of less than 80 hectares could not be reliably identified from these maps … The intention was to refine, resurvey and produce a final version. However, the refinement never happened and the maps retained the 'provisional' title. They were reissued in the late 1980's at a 1:250,000 scale (quarter inch to the mile) to better reflect their originally intended strategic use and are now available online within Natural England's Access to Evidence website.

Natural England is the custodian of ALC maps and data (produced up to 1999) in England and provides guidance on their use in its 2012 Technical Information Note 0493 and 2018 Guide to assessing development proposals on agricultural land. These confirm the provisional maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance at a strategic level. Moreover, they are only provisional because the ALC system was revised by MAFF in 1988 and these Revised Guidelines divide Grade 3 into Subgrades 3a and 3b. Land in Grades 1, 2 and Subgrade 3a later became classed as best and most versatile (BMV).

I object strongly to the use of these outdated soil classification maps to put a low value on this area of productive arable land, especially in such a nuanced area as the subdivision of soil type 3 into 3a and 3b. Far more relevant

should be our detailed knowledge of these soils, and our practical experience of over 20 years of farming the land on which the proposed panels would be sited.

I would also like to reiterate that the solar panels in this proposal are being sited on the most productive fields on the landowner's holding. For example, the north-eastern field of the proposal (known as Far Loggs) which is bounded to it's north by the river Ray and to it's west by the public footpath has, this year, yielded 8.7 tonnes per hectare of winter milling wheat. This can certainly be classed as agriculturally productive, and is indeed a good yield which is at the top of this year's national average winter wheat yield range recorded by the Agriculture and Horticulture Development Board (AHDB). The latest report (week ending 16th August 2022) on national yields by the AHDB (https://projectblue.blob.core.windows.net/media/Default/Market%20Intelligence/cereals-oilseeds/survey-results/Harvest%20Progress%20Reports/2022/AHDB%20Harvest%20report%202022_we%2016%20August%202022.pdf) states: 'The GB winter wheat yield is currently averaging 8.2 - 8.6t/ha'.

Last year (harvest 2021), on land in this proposal, we grew a crop of spring beans (which the bees and other pollinators loved!). These spring field beans achieved a yield of over 4.9 tonnes per hectare which was well above the national 5-year-average yield of 3.6 tonnes per hectare. (https://rural.struttandparker.com/wp-content/uploads/2021/04/Yield-Results-Harvest-2020_compressed.pdf)

I would therefore like to assert once more that regardless of how you classify it, in my opinion this is indeed productive arable land, and given the current concerns regarding national food security I strongly believe it should remain in full agricultural use.

Comments on the Ecological Appraisal Paragraph 4.2 states that 'In the north-eastern corner of the Site, a new grassland area will be created on arable land which regularly floods. This will be seeded to create a grassland habitat with a mix of grasses typical of regularly inundated conditions. Given the current use of the land, nutrient levels are likely to be high, therefore the establishment of a species-rich grassland is unlikely to be achievable'.

The suggestion that nutrient levels in the soil may be high in this area is something that both the RSPB and BBOWT refer to and accept in their comments.

Does this not conflict with the proposer's assertion that the land is of poor agricultural value?

As part of their submission the RSPB makes the requirement that 'grassland around the solar panels managed as species rich grassland with conservation grazing included as part of the management plan. This can include cutting and removing vegetation and minimal conservation sheep grazing which is sympathetic to the management of a wildflower meadow habitat.' And 'In terms of grazing within the security fence, we would advise that stocking is limited'.

And BBOWT suggest 'with the grazing by sheep being managed to maximise wildlife outcomes. This would include varying grazing levels through the year, with grazing removed at appropriate times'.

If the sheep management regime suggested by RSPB and BBOWT is adopted (in order to achieve the suggested 50% biodiversity net gain) then the proposer's assertion that the land will still have an agricultural (livestock) use is spurious.

Whilst fully accepting there is a need for renewable sources of electrical energy, there is also a very pressing need to at least maintain, if not increase, our current levels of national food security. I therefore believe that it is essential for productive land such as this to remain in agricultural use. I therefore urge you to reject this planning application.

Yours sincerely,

Heidi Smith, PhD.

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