Rachel Tibbetts

From: James Kirkham
Sent: 26 August 2022 10:12
To: DC Support
Subject: FW: Manor Farm Noke, Solar Farm application 22/0162/F

For DEF

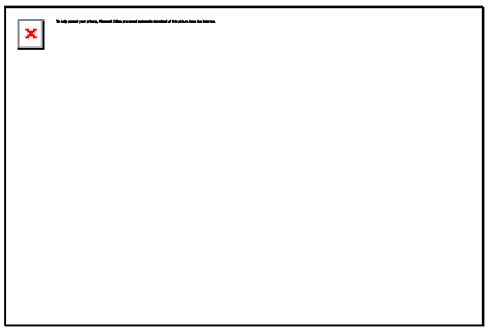
From: David Rogers [redacted]
Sent: 14 August 2022 15:35
To: James Kirkham <James.Kirkham@Cherwell-DC.gov.uk>
Subject: Re: Manor Farm Noke, Solar Farm application 22/0162/F

You don't often get email from [redacted] Learn why this is important

Dear Mr Kirkham,

Further to my recent email (below) following up two second responses to the Manor Farm Noke Solar Farm proposals, I am writing to draw your attention to this website of a major solar panel installer who is working on a joint project with the RSPB, 'to enhance the biodiversity of solar farms':

Anesco and RSPB shine light on solar farm biodiversity - Anesco



Anesco and RSPB shine light on solar farm biodiversity - Anesco

National energy efficiency solutions company, Anesco, has joined forces with the RSPB, Europe's largest nature conservation charity, on a pioneering new project that aims to enhance the biodiversity of solar farms. The agreement, which is the first of its kind in the UK, will see the creation of natural habitats for some of the country's most [...]

anesco.com

from where you will read about an agreement between the two partners as follows:

*"The agreement, which is the first of its kind in the UK, will see the creation of natural habitats for some of the country's most at risk species. It comes after research by the RSPB and other partners in 2013 revealed *60% of UK species have declined over the last 50 years.*
Anesco works with clients ranging from major corporations to small businesses and individuals, helping to drive carbon reduction and transform energy use. The company has managed the design and construction of some of the UK's largest and most complex ground mount schemes, installing in excess of 500MWs of solar PV.

The first stage of the partnership will see RSPB experts visiting a number of Anesco's existing solar farm sites to advise on ways they can be further enhanced to the benefit of 'priority species' – those wildlife groups deemed to be under the most serious threat. These recommendations will then be used to shape Anesco's biodiversity management plans for all new solar farm sites.
Darren Moorcroft, the RSPB's Head of Species and Habitats Conservation, commented: "We are happy to announce this new partnership with Anesco, building on their existing work to enhance their solar farm site biodiversity and to realise the potential they have to greatly benefit UK wildlife."

An agreement generally involves the funding of one party by another. I assume, in this case, Anesco is funding the RSPB for this work.

Please note that in this case **the agreement is to look at how to enhance the biodiversity withing solar PV sites - precisely the subject on which the RSPB initially commented on the Noke scheme**. There is no mention on the above webpage of investigating bird mortalities within solar PV arrays.

In my view, the above shows that there is a definite conflict of interest when the RSPB advises on any planning application for solar PV farms of the sort proposed for Noke, and raises two important question:

Did the RSPB declare this conflict when you sought, and it gave, its advice?

How much weight can and should you give to an organisation that is part-funded by a major player in the industry (solar PV installations) which is the subject of a planning application?

Yours sincerely,

David Rogers

David J. Rogers
Professor of Ecology (Retired)
Department of Zoology,
University of Oxford, UK

From: David Rogers [redacted]
Sent: 06 August 2022 19:41
To: James Kirkham <james.kirkham@cherwell-dc.gov.uk>
Subject: Manor Farm Noke, Solar Farm application 22/0162/F

Dear Mr Kirkham,

I am writing again about planning application 22/01682/F for a Solar PV array on Manor Farm, Noke, to which I submitted a joint response on 21/07/22 with Professor Fritz Vollrath and Jonathan Kingdon (under 'Hilltop Cottage, Horton-cum-Studley').

I note from the CDC website that there have been consultation responses after the 22nd July deadline from two official consultees - Natural England and the RSPB, from both of which it appears that you sought extra information, perhaps as a result of submissions from members of the public.

1. **Natural England.** I refer to the response 'Natural England clarification on ALC' dated 03/08/22. In this response Laura Elphick confirms the land is ALC Grade 3B. This confirms the proposer's Agricultural Quality of the Land Report - part of the planning application.

2. It is not clear from Laura Elphick's response. however, that she is aware of George Eustice's statement to the Environmental Audit Committee in June of this year, referred to in my own submission, where he confirmed that Grade 3B land is classified under 2015 guidance from DEFRA and the DLUHC as Best and Most Versatile (BMV) when it comes to the matter of Solar Farms - i.e. should not be used for them. Thus the debate as to whether the land is 3A or 3B is immaterial in this instance.
3. **RSPB.** Danield Widdowson's original submission on behalf of the RSPB has conditionally No Objections to the solar farm. The conditions appear to refer mostly to activities on the Solar Farm itself, but also mentions that the polarised light reflected from the panels should somehow be reduced. This original submission mentioned only the "potential collision risk for bird and bat species".
4. The follow-up statement on the 29th July more directly addresses bird mortality. It states (my emphases):

"Having reviewed the detail, there appears to be a general lack of evidence on how birds will be affected by a solar farm of this nature, either in a UK or a more local Otmoor context in terms of the species present at the reserve, and therefore we don't consider the detail reviewed to provide a basis for an objection to the application. In our experience, we've noted that, for example, passerines, seem only to use the panels as perches or to nest under. They don't appear, as such, to be attracted and we have never found a collision victim of any species on a solar farm. We do, however, take the observations in the attached paper and in other reviewed literature seriously and have, therefore, taken a precautionary approach and requested measures to further reduce polarised light pollution as part of a planning condition, in an attempt to ameliorate this potential risk, whilst proposing measures to further enhance the sites biodiversity value."

The first highlighted sentence is just plain wrong globally (please see my submission where most of the examples - clearly showing bird mortality on PV solar farms - are from the USA). The phrase 'either in the UK' is meaningless because there have been very few published studies from the UK and none at all that set out to measure bird mortality on solar farms. **Absence of evidence is not evidence of absence.** When Daniel Widdowson states "we have never found a collision victim of any species on a solar farm" he should be challenged as to just how hard did they look? All the American studies set out to look systematically for such evidence - by regularly walking the solar farms, by carrying out experiments on the persistence of cadavers etc. There is no equivalent literature from the UK. I could ask the question 'How often do you see a dead bird?' Most people would answer 'Never' to this question; yet birds are dying around us all the time. Only a systematic survey to look for evidence would be acceptable proof here, not 'not having seen any dead birds on solar farms'.

Having reviewed the 'attached paper' Daniel Widdowson accepts that the literature 'has to be taken seriously', but then only confirms the advice given in the earlier submission about reducing polarised light. The two references in that earlier submission are to insects, not birds; those and other studies show species-specific differences in the responses of insects to polarised light, so there cannot be a 'one size suits all' solution here - at least in the case of insects. It's fairly clear that birds are using polarised light in a rather different way - in connection with orientation around dusk for migrating species - so it is unwise to extrapolate from one group of animals (insects) to another (birds), even though both are sensitive to polarised light. As mentioned above, there is sufficient evidence from the USA that birds are killed in solar PV arrays. What we do NOT know yet is the contribution of that mortality to the overall mortality the bird populations experience. But the precautionary principle requires us to be very wary of siting a very large solar farm just next door to a wetland bird reserve with thousands of annual migrants.

I was disappointed that Daniel Widdowson did not refer to the RSPB's own advice, as referred to in my submission (again my emphasis):

"The RSPB have produced a policy briefing that outlines the society's position on solar PV developments (RSPB, 2014). This document highlights that the RSPB advocate solar technologies, however recommend avoiding deployment in locations close to protected areas, or close to water features (highlighting a potential negative impact upon aquatic invertebrates as a risk, both independently and as a food resource for birds)."

I am not aware of any subsequent update to that policy briefing, since when more information has emerged in the USA about bird mortality in PV Solar Farms.

I do not see how the RSPB's conditional 'No Objection' to the Manor Farm Solar Farm is compatible with its own policy briefing.

One of your public responses (46 Cumnor Hill) was from Professor Sir Chris Perrins, LVO, Fellow of the Royal Society, sometime Director of the Edward Grey Institute of Field Ornithology in the University of Oxford and author of numerous authoritative books on birds. I do hope you will take seriously his conclusion:

"The main risks arise when the birds crash-land on them (solar panels) killing themselves. Crash-landing occurs when the birds mistake the glass surface for water; this most often happens in conditions of low light, i.e early morning or late evening, but also may occur during periods of bright moon-light; this is because many migrating birds migrate at night. Large birds such as swans (one of my study species) are particularly vulnerable because they need longer approach runs (=more time). Placing large solar farms close to areas of important habitat will increase the death-rates since more birds will be in the vicinity. Positioning the farm close to a waterway used as a flyway by the birds will further increase the losses. Hence an area of flat, low-lying land adjacent to areas of natural wetland is the worst place to build a solar farm."

Chis Perrins is being characteristically modest when he says 'swans (one of my study species)' because he is Warden of the Queen's Swans (one of two posts spun out from Keeper of the Queen's Swans - a title dating back to the 13th Century), a post he has held for almost 30 years.

Warden of the Swans - Wikipedia

> **Warden of the Swans - Wikipedia**
>
> The Warden of the Swans is an office in the Royal Household of the Sovereign of the United Kingdom, created in 1993 when the ancient post of Keeper of the Kings Swans (which dated from the 13th century) was divided into two new posts. The second is the Marker of the Swans.. The first office-holder, as so far the only Warden of the Swans, is Professor Christopher Perrins, LVO, appointed 1993.
>
> en.wikipedia.org

Yours sincerely,

David Rogers

David J. Rogers
Professor of Ecology (Retired)
Department of Zoology,
University of Oxford, UK