Comments for Application 22/03873/F – JBM Solar Farm

Local Plan

- Whilst the adopted Cherwell Local Plan is generally supportive of proposals for renewable energy (Policy ESD5), the local plan has not allocated any specific sites. Paragraph B.201 states that there is increasing interest in the development of large scale solar PV arrays. Local significance will be relevant. Local significance includes landscape and biodiversity impacts, visual impacts on local landscape, historic environment, highway and access matters.
- 2. The Councils own recent consultation in respect of the new Local Plan (September 2021) identified that the general sentiment from public consultation events is that Cherwell **should not lose agricultural land to solar farms, and would rather have PVs on new buildings**, or proposed new development.

Application Documents - requests for further clarification:

- 1. The Site is designated as open countryside in the adopted Local Plan. The scale of the development is of particular concern. 150 acres of open countryside will be taken which when combined with the land taken to the East of the area for EWR and to the North for HS2 amounts to a huge loss for the local community and a significant change to the local landscape.
- 2. Should further evidence be provided in respect of the Agricultural Land Classification? It is understood that a second survey was carried out, which confirmed the findings of the first survey, but we have not been presented with evidence of this.
- 3. Whilst the application is supported by many expert documents there are further clarifications to be sought:
 - 3.1 Extent of Baseline Survey information especially ecology, wintering birds etc. As a resident and dog walker in this area for over 6 years we know that there are many nesting birds, birds of prey, deer (roe and muntjac), hare and other wildlife that inhabit the proposed site and its surrounding woodland. They have well established routines which involve grazing on the current open countryside site. The development process, if not the solar farm itself, will disrupt these routines and we could lose these animals from this area.
 - 3.2 With the above sentiment in mind would it be reasonable to ask for a more thorough Ecology Survey, over a more extended period of time in order to better understand the wildlife in this area? The current Ecology Survey data is a mixture of desktop and/or bare minimum surveys. A survey period should be lengthy enough to enable a robust evidence set ahead of determining an application. E.g. 1 year minimum.

- 3.3 There are claims that there will be improvements to biodiversity, however as part of the assessment & calculations should this include for a wider area than just the development site red line? i.e. have a recognition of the wider ecological and the interlink benefits of the ancient woodland and the Padbury Brook. The Padbury Brook is not referenced in the application but is approximately 3-500m from the proposed development.
- 3.4 Will the Council be consulting Natural England and/or employing their own expert capability to validate the current data provided by JBM?
 - 3.5 There will be a visual impact as a result of the development on local views. Whilst photomontages of key views have been presented, should the applicant be presenting verified views to more accurately substantiate this impact?

Highways:

- 1. The Mill Lane crossroads has had more accidents than officially reported. It is a junction notorious for accidents (well known amongst local residents) especially in adverse weather conditions due to the camber of the Poundon road and the poor visibility at the junctions. A quick visual survey of this area will highlight that several signposts erected within 100 metres of this junction, and at various points along the Poundon road, have been knocked over due to cars skidding and road traffic accidents. I have photographic evidence of a car in a ditch along this stretch only last week when the entire Poundon road was covered in ice. The application mentions that accidents have happened mostly in 'adverse conditions'; in this area there are adverse weather conditions for the majority of the winter months!
 - The poor quality of the road surface along the Poundon road, made worse by all the EWR HGV traffic, will be negatively impacted even further by an increase in HGV traffic for the construction of the new site. There are many near misses not reported. As this is a fundamental H&S matter, then further survey work and Road Safety Audits should take place ahead of determining an application. Will the council be consulting the relevant Highways Authority?
- 3. The application mentions that the HGV traffic required to travel along the roads in this area will only provide a small percentage increase. I would like to argue that this increase is on top of an existing increase in HGV traffic for EWR development, resulting in a significant increase in HGV traffic over the past few years on a country road with no foundations.

Stratton Audley village:

The application mentions that Stratton Audley will only be affected by the laying of pipework for approximately 10 days. This may be the case for the centre of the village but as residents will need to travel in and out of the village I would suggest that the disruption will be far longer. The pipeline will need to come along the length of road from the Buckingham Road junction all the way to the Mill road crossroads which is approximately 2 miles. Will the roads be closed for the duration of the pipe-laying or will they remain open with traffic lights?

Additionally the laying of the pipework will involve a lot of vibration which will undoubtedly affect the properties in the village. The majority of properties are old and unlikely to have been built with the same foundations required by modern building standards.

General Concerns

- 1. Concerns about the experience of the public right of ways being diminished as amenity as a result of installing PVs. In addition, there is the potential interactions of dogs with sheep required to graze the land.
- 2. Concerned that whilst the adjoining land may not have a specific designation in the local plan (e.g. SSSI) that the area is providing a greater level of ecological benefit than is currently recognised and that there is a lack of surveys/evidence to validate the baseline position.
 - 3. Concerns that the section of ancient woodland & ecology is impacted as a result of the development and that the development is inappropriate in this location.
- 4. Concerned that the land in the proximity of the Padbury Brook acts as Functionally Linked Land and helps supports many variety of bird species that will be impacted by the installation of PVs. Functionally linked land' (FLL) is a term often used to describe areas of land or sea occurring outside a designated site which is considered to be critical to, or necessary for, the ecology or its behavioural functions
- 5. Concerned about Highways and a worsening of an existing accident hotspot
- Concerned about disruption and workmanship to the Highways. i.e. expect a road surface to be in no worse condition as a result of creating a connection to the sub-station
- 7. Concerned about the visual impact
- 8. Concerns of the overall scale
- 9. Concerned about the future management
- 10. Concerned about the old properties in Stratton and the impact of vibration on the fabric of the properties.