



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Mrs Morgan

Ref : Re Padbury Brook Solar Farm Planning Application 22/03873/F

CPRE strongly objects to the above development which is on a site located in the open countryside. We strongly support the well presented arguments in the representations made by Stratton Audley and Goddington Parish Councils.

CPRE recognises that the installation of solar panels can have an impact on the planet's dependence on fossil fuels. However we believe that the installation of solar panels must not create unacceptable harm to the countryside and our rural communities. As a general principle CPRE believes that solar panels on buildings, or other structures on brownfield sites such as car parks, provide alternative sources of solar energy to gas and electricity without the harmful impacts that emanate from the establishment of solar panels on greenfield sites.

CPRE is concerned that a number of similar type solar farm applications have been submitted within Oxfordshire over the last year including some in Cherwell. There are no allocated sites within the current adopted Cherwell local plan therefore these plans are speculative in nature. Whilst recognising the important role that renewable energy can play in reducing fossil use and moving to net zero carbon emissions, CPRE believes that solar panel based developments should be evidence and needs based. An Oxfordshire strategy for renewables should engage with the public setting out the amount and spatial location for renewable projects.

CPRE is concerned at the inordinate length of this type of renewable project which has a 40 year term with a possible option to extend. There is of course the risk that once a solar farm has been established this will grow into a cluster of solar farms. CPRE is concerned that other technological solutions will outdate solar panel technology resulting in this solar farm application becoming outdated well before the end of its 40 year term. The potential transient nature of this technology needs to be balanced against the alternative uses for this land such as food production. In that respect, we do not currently see any of Oxfordshire's local authorities with a coherent strategy towards the adoption of alternative, renewable energies, including solar.

CPRE has considered the degree that this application meets the requirements of the local plan and in particular Local Plan Policy ESD 5, Renewables Energy. This explicitly states renewable energy projects will only be supported wherever any adverse impacts can be



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addressed satisfactorily. Unacceptable impacts in this proposed development includes the cumulative impact as outlined in the parish council responses to Goddington and its environs from ongoing work relating to East West rail.

Visual Impacts on Landscape

We support the objection letters from the parish councils with regards to visual impacts on the countryside. CPRE believes that this development is contrary to Cherwell saved policy C8 as it is a sporadic development in the middle of the countryside. This development does not protect the character, the environment or the agriculture resources of this rural area as per saved policy C9. CPRE does not believe that this development's buildings and proposed tower and 4,1km of perimeter fencing along with the cabling required to connect the site to Bicester is sympathetic to the rural context of this development and is therefore contrary to saved policy C28. The Cherwell District Council Stratton Audley Conservation area appraisal states that the 'protection of important open spaces is important to protect the open and aesthetic quality of the countryside adjacent to the village because it is integral to the character and appearance of the conservation area'.

CPRE is concerned at the amount of time that the proposed screening of the site will become effective or whether it will ever properly mitigate the adverse visual impacts of the site. CPRE is concerned as to how robust the visual and landscape assessment is given that Stratton Audley Parish Council, in their objection response, provided evidence that key views appear to have been omitted from the applicant's landscape and visual assessment.

Assessment of Agricultural Land

CPRE would contend that given the current pressure on food prices globally and food insecurity it is somewhat imprudent to sacrifice land that supports the growing of food crops even on land that is not classed as most versatile (grade 3a and above). Although this development will be on land that has been assessed by the applicant is grade 3b there is some doubt cast by respondents as to whether the grade of this land had been correctly assessed by the applicant. This planning application has been submitted on land that has been extensively farmed for a decades and the land has been found to be very productive from a food crop perspective.

Biodiversity Enhancement

CPRE acknowledges the net biodiversity gain claimed by the applicant and welcomes sight of the landscape management plan. Given the size of the biodiversity gain claim of up to 215% for non linear habitat, CPRE has some reservations about the size of gain claimed. CPRE has concerns as to whether the applicant's proposed biodiversity solution will be out of character with its settings. There is also a question as to the impact of the development on existing nature corridors which are well established and the effect that this has on species native to the site. CPRE is concerned that the applicant intends to remove good condition hedge rows given the importance of these in nature recovery. As per the current adopted plan para B237, all developments should include surveys of the brown hairstreak butterfly, but CPRE cannot find any evidence of this in the applicant's ecological statement.



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Other Considerations

In addition to its compliance with current Cherwell policy, CPRE has concerns around how the applicant has arrived at the CO2 savings calculation of 32,947 tonnes as outlined in para 2.1.5 of their planning statement. The statement states that the solar farm will generate sufficient energy to heat 16,680 homes but will this be for the duration of the 40 years or will there be some degradation in the panel's performance and has this been reflected in the calculation.

Alternative energy generated from solar panels will only replace the electricity used by the 16,680 homes above and CO2 emissions will continue to arise from their use of gas and oil where applicable. CPRE would also question whether CO2 emissions arising from the development itself have been properly factored into the calculation such as the transporting of materials as well as the materials used in the production of batteries and solar panels.

Local Support

CPRE is strongly of the view that this type of renewable project should only proceed if it can be demonstrated that it has public support from those communities that are most impacted from the development. Notwithstanding the adverse impacts on much treasured landscape, applications, such as this, are speculative in nature and have not been part of a consultation process on identifying suitable local sites which can then form the basis of a district wide local plan. The results of the applicant's consultation feedback demonstrated that there was not a local majority in support for this development. Furthermore, in their consultation response, Goddington Parish Council requested feedback, after the applicant's exhibition of the development and received no expressions of support in favour of the development.

Decommissioning and Restoration of the Site

CPRE believes that it is essential that the decommissioning of equipment from the site at the end of the term has to be properly planned for at the commencement of any proposal. A legal agreement should be drawn up to ensure that the land is restored to its previous use which is principally food crop growing.



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Conclusion

This development will have a highly damaging impact on the rural landscape. This site has not been allocated for development in the currently adopted local plan. CPRE does not believe that development has sufficient support from the local communities that are most affected by it. CPRE further believes that this development does not significantly contribute to the district's net zero objective and there is a surfeit of opportunities that are not being sufficiently explored, such as rooftops and car parks, which cause significantly less harm than this development. CPRE would urge that this development is refused.

Yours sincerely

Nick Dolden

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CPRE, Cherwell District

Copies to: Robin Oliver, Chairman Cherwell District CPRE
Helen Marshall, CPRE Director