

EN010158 – Rosefield Solar Energy

Written Representation concerning the Applicant's submission to acquire Compulsory Purchase Order Rights to land within the Order Limits.

Interested Party: [REDACTED]

This submission follows an oral statement made at Compulsory Acquisition Hearing 1 held on 25th February 2026.

I am grateful to the Inspectorate for affording me the opportunity to speak at the Hearing.

For the record and for the avoidance of doubt, I wish to dissociate myself from comments in the Relevant Representation at **RR-040**, ascribed to a 'Chris Jordan', which purport to favour the development. Those are not my views.

I am a resident of East Claydon and a Member of East Claydon Parish Council. My submission is made on my own behalf. I confirm that I have no interest in any of the land within the Order Limits, nor have I been asked or instructed to make comment on the matter. The views expressed here are based on my own observations and a review of documents in the Examination Library and the wider literature.

On the specific issue of Compulsory Purchase Orders, I believe I reflect the view of many residents that, were this right to be granted to the Applicant, it would have very serious implications for local agriculture, for the local and national economy and for the communities across the area, both in the short- and long-term.

Background

- 1.1 The proposed development site is largely devoted to agriculture. The Applicant's case for selection of the Site includes a suggestion that, since much of the area is classified as Grade 3b land, it of low value. On the contrary, the combination of high-quality grassland and tranquillity across the area provide the ideal, stress-free environment for grazing animals. The Site includes part of the former Drovers Way from Buckingham to Aylesbury that passed down Sion Hill (East Claydon) and through the area designated 'Parcel 3', along which animals were brought to markets in London from as far away as Wales. Fields south of East Claydon were renowned as "*the richest grass Welsh cattle would ever encounter*" ([East Claydon south - 1 - Local Drove Roads](#)). That is the value of the land.
- 1.2 We have a remarkable group of local farmers who, over generations, have learned how to manage the land. They are experts in that management but, also, have adopted an approach to agriculture that ranks high on animal welfare and encourages biodiversity. The Open Floor Hearing held on 24th February heard from one such example.
- 1.3 Already, we have seen one tenant farmer evicted in anticipation that the proposed development would proceed. As a result, we have lost their knowledge and skill in

managing the land, accumulated over generations. Importantly, we have also lost a family that was closely integrated in the community and provided services to it. The importance of interdependencies between local farmers and the local community cannot be overstated.

- 1.4 Agriculture has also shaped the landscape – small fields and extensive hedgerows are features of the local Landscape Character Areas, in marked contrast to many areas of the country. Many of the fields retain ridge and furrow profiles dating back to the Medieval period.
- 1.5 Direct employment, as well as services from suppliers and contractors, are all dependent on local agriculture. These include seed suppliers, sub-contractors, veterinary surgeons, farriers, suppliers of agricultural equipment and many more.

The Applicant's Assessment of Impacts on Agriculture

- 2.1 The Applicant appears to have paid scant regard to the importance of agriculture in the area. Indeed, it will be noted that document **6.4 Environmental Statement Volume 4 Appendix 14.1: List of Commercial Operations/Businesses within the Community Study Area (APP-130)** makes no reference to any agricultural business in the area. Paradoxically, if one searches the document, apart from the Farm Deli in Winslow, the only reference to 'farm' is the Rosefield Solar Farm which, of itself, is a contradiction in terms.
- 2.2 The list at **(APP-130)** even fails to include Preston Farms which, as was referred to during Compulsory Acquisition Hearing 1, through its sister company, TCS Biosciences Ltd, generates products that provide a **unique, central and irreplaceable pillar to the NHS**, pharmaceutical and biotech industries. Any interruption to this combined business, even on a temporary basis, would be catastrophic, putting at serious risk the prompt diagnosis of bacterial and fungal infections in patients across the health services, as well as disrupting microbiological and cell culture-based research programmes in the pharmaceutical and biotech industries. Notwithstanding discussions during Compulsory Acquisition Hearing 1 that touched on the interests of Preston Farms, its omission from **APP-130** is extraordinary and seems to reflect the Applicant's reluctance to recognise the importance of local agriculture and, in particular the exceptional status of Preston Farms.
- 2.3 The Applicant appears to consider landholdings purely as a commodity. Little, if any, attention has been paid to the value of the land in the workings of a farm, the nature of the soil, its sensitivities and how it is managed, the importance of biosecurity, the conditions needed to support responsible and effective animal husbandry or, indeed, the skills and knowledge of the local farming community, often developed over generations.
- 2.4 The Applicant has undertaken an assessment of the impact of the proposed development on agriculture in document **6.2 Environmental Statement Volume 2 Chapter 14: Population (APP-057)**. It notes (Paras 14.5.48-50) that 652.02 ha of land within the Order Limits are under agriculture, woodland blocks, etc. The Claydon Estate holds 624.2 ha of, which 174.4 ha are in hand, 449.8 ha are tenanted, and a further 131.2 ha are held by Preston Farms.

- 2.5 The impacts of permanent removal of 451 ha and temporary removal of 226 ha from agricultural use (a total of 677 ha; Para 14.8.17) are considered on a **county-wide** basis. This is, at best, disingenuous. The true impact is clearly local and should be judged as such. Rather than the quoted loss of **0.65% of the county-wide** agricultural land, based on the Applicant's own figures, this amounts to $677/652.02 = 103.8\%$ **of the land currently under agriculture, woodland blocks etc. within the Order Limits.** *[It should be noted that the total area of the Site within the Order Limits is quoted as 675.05 ha (Para. 4.1.2; 5.7 Planning Statement; APP-037)].*

Land swaps and land use during the construction period

- 2.6 It is argued under Paras 14.8.22-30 of **APP-057** that pending agreements to surrender land or engage in land swaps would allow agricultural businesses to continue. I am not in a position to judge the suitability of those alternative blocks of land, but it should be borne in mind that exchange on a hectare-hectare basis does not necessarily imply the suitability of those alternatives in terms of location, accessibility, drainage, water supplies, etc.
- 2.7 For tenants required to surrender land, it is difficult to justify the Applicant's claim at Para. 14.6.40 that, "*where appropriate, impacts on businesses as tenants are mitigated and/or compensated such that significant impacts on their operation are avoided.*" If the tenant is required to surrender their lands, by definition, impacts on their operation are **Highly Significant.**
- 2.8 Para. 14.8.92 goes on to say that full continued agricultural use would be possible on land designated for cabling routes. It is difficult to see how this would be possible. What consideration has been given to the impacts from damage to soils, noise, movement of vehicles, and compromised biosecurity, etc., that, inevitably, would preclude such use for livestock?

Impacts on employment

- 2.9 The solicitor acting for the Applicant has suggested that the proposed development would generate employment benefits and that land use has been maximised in the design of the project. I would contest this, not least because the importance of local agricultural businesses has been largely dismissed in the Applicant's submissions. The claimed employment benefits of the scheme would occur largely during the construction period where a largely itinerant, rather than local, workforce would be employed. Permanent, local employment during the operational phase would be relatively limited in number and needs to be set against the loss of existing skilled employees, which doesn't seem to have been considered in any detail.
- 2.10 The Applicant has estimated impact on employment in agriculture on a **county-wide** basis. Para. 14.10.5 of **APP-057** states that the indicative loss of employment [*magnitude not stated*] is far less than seasonal changes across the county. As such, Para. 14.10.6 argues that, "*there is likely to be a minor magnitude of change on a medium value (sensitivity) receptor (the agricultural economy of Buckinghamshire) resulting in a direct, temporary (in some cases leading to permanent) slight adverse (not significant) effect.*" This is a misleading representation of the true impact on the local situation and on businesses of national importance.

The Applicant's Conclusions

- 3.1 The Applicant's assessment of the impact of their proposals on agricultural businesses and landholdings is that the value of landholdings is **Very High** but the magnitude of change is **Minor** (Para. 14.10.10; **APP-057**).
- 3.2 Assessment of the impact on the agricultural economy of Buckinghamshire during the construction phase (Para. 14.10.6) is deemed as **Minor Adverse (Not Significant)**. No consideration has been given to the wider (national) economic and health impacts of any disruption to the business of Preston Farms/TCS Biosciences in particular, to the businesses and livelihoods of tenant farmers, or to the important interdependencies within local communities.
- 3.3 I submit that assessment of the impact on agriculture on a county-wide basis is not appropriate, especially given the critical importance of local agricultural businesses that is overlooked on that analysis.
- 3.4 During the operational period of the proposed project, the Applicant judges any impacts on agricultural employment capacity (Para 14.10.37) to be **Minor Magnitude** on a **Medium Value** receptor. This, again, has been assessed on a **county-wide** basis whereas I submit that the assessment should be on **local impacts** which, in my view, would be **Major** and **Highly Significant** on a **Very High** value receptor.

Cumulative Impacts

- 4.1 In document **6.2 Environmental Statement Volume 2 Chapter 17: Cumulative Effects (APP-060)** the Applicant considers potential cumulative impacts with other local infrastructure projects.
- 4.2 This document makes only limited reference to potential cumulative effects on agriculture, focussing mainly on impacts on soil. However, it concludes that effects would fall largely on 'population' and concludes that the combined effects would be **Not Significant**. There appears to be no assessment of the cumulative impacts, for example, on the ability to conduct an agricultural business, the impact of noise, dust, etc, on livestock or biosecurity. As such, the assessment is incomplete and flawed.
- 4.3 On **Page 65** of the document, the Applicant states, "*All soils within the Order Limits have a medium resilience to damage during handling and are of medium sensitivity. The magnitude of impact for soil ecosystems will also be minor. Therefore, the significance of the residual effect will be slight adverse and not significant.*" This is not correct. The clay soils that characterise the area have low resilience to damage and are particularly susceptible to compaction when wet (*The impact of solar photovoltaic (PV) sites on agricultural soils and land quality* Date: March 2023 (Report to the Welsh Government; [The impact of solar photovoltaic \(PV\) sites on agricultural soils and land quality Work Package Three SPEP2021-22/03](#))). This adds further weight to the proposition that the impact of the proposed development on local agriculture within the Order Limits, of itself and cumulatively with other infrastructure projects, has been significantly underestimated. Were all of the proposed infrastructure projects to proceed, local agriculture would be decimated.

Consequences of Granting CPO Rights

- 5.1 Given the Applicant's apparent lack of interest in, or understanding of local agriculture, in particular the critical importance of Preston Farms, I have grave concerns that, were the Inspectorate minded to grant CPO rights, the short and long-term future of agriculture across a large area, both within and beyond the Order Limits, would be seriously compromised.
- 5.2 The evidence presented here, together with statements made on behalf of the Applicant at Compulsory Acquisition Hearing 1, serve only to reinforce the view that the Applicant considers that landholdings, of themselves, constitute an asset that eclipses the value of agriculture. The importance of skilled animal husbandry and land management, the absolute need for biosecurity, and the dependence on a stable and tranquil environment for the avoidance of stress on animals seem to have been disregarded in assessing the consequences of the proposed development, especially during the construction period.
- 5.3 Inherent in the Applicant's proposals is an apparent lack of acknowledgement of the value of local, agriculture-dependent businesses, (the importance of which extends beyond Buckinghamshire boundaries), or the very significant risk of disruption to those businesses.
- 5.4 Granting compulsory purchase rights over a large area of agricultural land to a Third Party, whose interests and expertise lie outside those of agriculture, poses the question as to what does the future hold for that land? What safeguards would there be to prevent the Applicant from reallocating or restricting use of the land during that period and what are the genuine prospects for its return to agricultural use following decommissioning?
- 5.5 Finally, as mentioned, we have already lost a valued tenant farmer. Others have commented that a number of interested parties are not in a position to make public comment on the impact of loss of landholdings on their businesses and livelihoods. It has been argued that Compulsory Acquisition Hearing 1 provided an open forum in which any such affected individual could freely express their concerns. However, that freedom is apparent rather than real for some individuals, given that expression of their concerns could prejudice any compensatory agreement.
- 5.6 Compulsory purchase of the land would seal the fate of others without the opportunity for adequate redress and, with it, loss of generations of expertise, knowledge and established interdependencies within the communities. Some of those are tenants of the principal landowner and so they have not afforded the opportunity to enter into voluntary agreements. Their demise would be a permanent loss and a sad legacy. There would be no return, even after decommissioning.
- 5.7 I question the suitability of an energy company to act, over four-five decades as custodian of valuable agricultural land, with its associated economic value, both local and national, (uniquely in the case of Preston Farms), and its associated heritage.
- 5.8 I respectfully suggest that it would be inappropriate to grant CPO rights to the Applicant given the persisting inherent uncertainties and implications for the legacy that it would leave.

Dr Chris Jordan

March 2026