Application by Rosefield Energyfarm Limited for the Rosefield Solar Farm

The Examining Authority's first written questions and requests for information (ExQ1): issued on 2 April 2026

Comments by East Claydon Parish Council

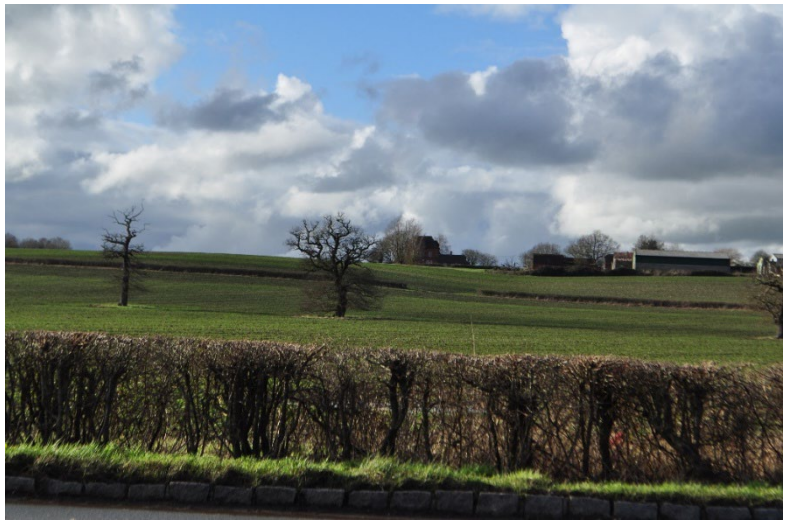
(AI has not been used in the preparation of this document)

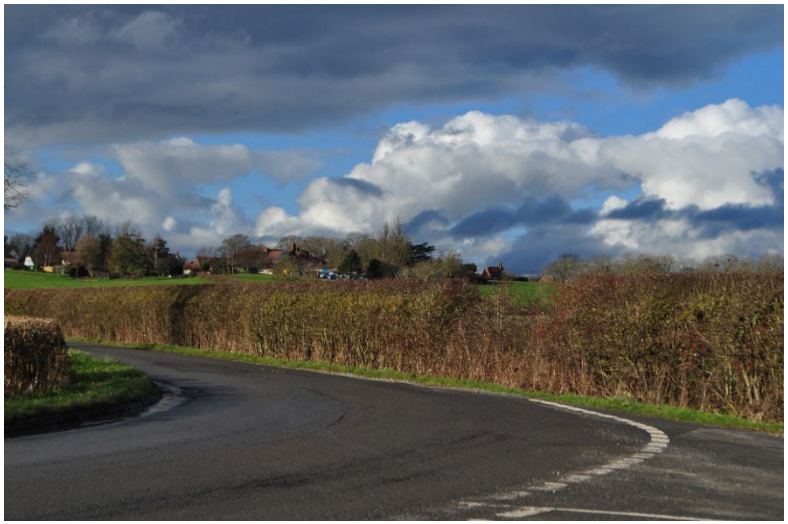
ExA Question	Topic	Comment
Q1.1.1 & Q1.1.3	Installation capacity and grid connection.	We suggest that applicant needs to provide clear statements on the true GHG emissions and savings associated with the actual capacities for solar generation and BESS storage. We suggest that their position on the connection status for the solar and BESS components is of particular importance as it is our view that the applicant has not made a strong case for need.
Q1.1.6	Solar Road Map.	**The Solar Road Map**. We **agree** that there should be greater encouragement and requirement for installation of solar panels on domestic and commercial buildings. There is huge scope in the area (e.g. Milton Keynes, Bicester) for installation of solar panels on warehouse buildings. The energy generated could be used locally, thereby reducing the load on transmission networks. We **disagree** with the assertions that solar installations cause minimal disturbance to the ground and that grazing of livestock alongside solar installations is a realistic proposition. We **agree** that there are threats to the livelihoods of tenant farmers where land is taken for solar developments. However, this is **not resolved** simply through some form of financial compensation. We **agree** with the statement that, "*Local communities must be at the centre of local project development and directly benefit from clean energy projects*." However, that is **not the case** with the present project or, indeed, with other electrical infrastructure projects in the area.
Q1.4.2	Continued use of agricultural land (see also Q1.7.17).	We are concerned that the proposed intention to graze sheep and cattle is no more than a proposal. This is important not only in retaining agricultural activity but it also has a bearing on the maintenance of critical ecosystems, notably the interaction between cattle grazing and bats. With the loss of tenant farmers and likely compromises to remaining agricultural activity, who would be responsible for ensuring that the required grazing persists over the 40-year life-cycle of the scheme?

Q1.1.5	Mitigation – travel arrangements for construction staff.	We share Buckinghamshire LPA's concerns regarding guarantees for staff travelling to the site by minibus. We note also that there is no provision in the CTMP to ensure that the large number of vehicles required to transport 600 staff to and from the site per day do not travel through local villages which have little or no capacity to accept additional traffic.
Q1.7.1	Adequacy of applicant's response to relevant representations made by East Claydon Parish Council (**RR-070**).	1. Consultation process (**PDA-006, Table 2-14, p228**) We disagree with the applicant's comments. There has been a consistent lack of interest in or understanding of: • Importance of agriculture and its interdependencies across the communities; • Specifically, the local and national importance of Preston Farms/TCS Biosciences; • Importance of the local PRoW network and rural roads as recreational assets and for the health and wellbeing of residents and visitors from a wider area; • Importance of tranquillity, contact with the countryside and wildlife, dark skies to health and wellbeing and residential amenity; • Critical contribution of the surrounding countryside to the setting of key heritage assets and conservation areas. 2. Support for renewable energy but not at the expense of negative impacts on agricultural land (**PDA-006, Table 2-14, p229**). The applicant has simply restated the importance of renewable energy and justified their position on the basis that a limited amount of land take involves BMV soil areas. However, the true socio-economic consequences of the proposed development have not been adequately addressed. The proposals for sheep and cattle grazing alongside the development are not well thought through and lack guarantees. 3. Flawed site selection process (**PDA-006, Table 2-14, p231**). The applicant has not provided any further clarification of the site selection process. The suggestion that the site was selected in part on the basis of topography is not tenable given that much of the area chosen for solar panels is on north-facing slopes. The potential negative impacts on Preston Farms TCS Biosciences do not appear to have figured in the applicant's site selection procedure. 4. Consideration of alternative renewable energy technologies (**PDA-006, Table 2-14, p229**). The applicant states that alternative renewable energy technologies were considered and refers to APP-036. Para. 4.5.2 of **APP-036** states that *"The Site is also not considered to be well*

		suited for onshore wind energy generation due to the low, flat topography of the local area" but much of the site is hilly.
Q1.7.9	Justification for not surveying the cable corridors	We welcome this question. It is a matter of great concern to us. Without ecological surveys of these areas, the applicant has no basis for assessing potential for harm or scope for displacement of species.
Q1.7.15	Impact on ground nesting birds, especially skylarks.	We welcome this question. The local skylark population is a highly-valued asset. We suggest that the cumulative impacts of multiple infrastructure projects across the area have not been adequately addressed.
Q1.7.17	Proposed use of grassland and grazing.	We agree that these are important questions. Clarity is needed on how management of the land will be undertaken and whose responsibility is it to ensure that cattle and sheep grazing is maintained throughout the life-cycle of the development.
Q1.7.18	Calculation of habitat loss does not include certain areas of the Site.	We agree that this is an important issue which also relates to Q1.7.9 where the lack of surveys for the cable routes means that calculations of habitat loss are flawed. This is particularly important where loss of hedgerow is concerned. Even though there may be some compensatory replacement hedging, the contribution to BNG is only achieved over a number of years.
Q1.8.2	Estimation of impacts on GHG.	We suggest that, in addition to this question, the true GHG footprint of the <u>actual installed</u> capacities for solar and BESS should be provided. We would be interested to know the estimated energy losses from the BESS and how waste heat will be managed.
Q1.10.4	Impact of development of Field E11 on heritage assets.	We are concerned that the full extent of buried heritage assets across the Site remains to be established. National Grid has recently undertaken archaeological surveys across Fields SA52-4 and SA57-9, including trench investigations (which incorporate an area proposed for cable connections from the proposed Rosefield substation). We suggest that it would be helpful to have results of those studies in order to develop a fuller picture and hence likely cumulative impact of any development.
Q1.10.11	Impacts on the settings of conservation areas.	We submit that the applicant has not given due attention to the importance of the rural settings of the Botolph Claydon Conservation Area and East Claydon (**PDA-006**) in their responses to comments by Buckinghamshire Council (RR-026) and the Claydon Solar Action Group (RR-049). The current approach to Botolph Claydon along Claydon Road will change from a rural to an industrial setting (see photos below). The same applies to the cumulative impacts of the applicant's development with the National Grid substation and Statera BESS on views of the Grade II* Listed St Mary's Church and the Grade II Listed White House approached from East Claydon Road and from Sion Hill. These

		will be transformed from settings that have changed little over four centuries to an intensive, industrialised scene.





Q1.10.11 Views from Claydon Road (left) looking across Fields D44-5 towards Bernwood Farm and (right) from the junction of Claydon Road and Granborough Road towards Botolph Claydon with Field D45 out of shot to the left.

Q1.11.12-15	Cumulative effects with the proposed replacement National Grid substation.	Table 17.8 of REP1-044 examines elements of the proposed National Grid substation and dismisses the potential for inter-project cumulative effects with the generic statement, *"Provided there is adequate mitigation for the National Grid East Claydon Substation development there should be no inter project cumulative effect."* In our view, this is not a credible position to take. The proposed location of the National Grid substation is adjacent to the site identified for the applicant's substation which, in turn, is adjacent to land designated for the Statera BESS substation, (the two being on opposite banks of a tributary of Claydon Brook). These are tall structures and there would be additional pylons serving the National Grid substation. The combined visual harm, loss of amenity on PRoWs, noise, loss of habitat, pollution threat to watercourses, etc. would be very considerable. It is disingenuous to suggest that mitigation measures could prevent interproject cumulative effects.
Q1.11.16-26	Cumulative effects with other projects.	The applicant has adopted the general approach that other projects would have mitigation in place that would minimise their individual impacts and so would have little additive effect. This lacks logic. The applicant acknowledges that their project would have residual negative impacts. By the same token, it is highly likely that all of the other schemes would have residual

		negative effects. Therefore, multiple negative residual effects must result in a cumulative impact. In any event, the applicant's failure to establish a sound baseline for habitats (see Q1.7.18) means that the true potential cannot be determined and so there is no basis for understanding cumulative impacts. There are two specific areas where we suggest it would be helpful to have the applicant's considered assessment of cumulative risk as follows: 1. The risk of a thermal runaway event is a function of the number of battery cells. Including that of the applicant, there are currently three BESS installations proposing connections to the East Claydon National Grid substation. The storage capacity of the applicant's BESS is not stated but assuming it to be 500 MW (say 1 GWh total capacity) with the others (Statera), 3.5 GWh, and (Statkraft) 1 GWh, that amounts to a total of around 5.5 GWh. Assuming a typical 500 MWh BESS would require 1.5-2 million individual battery cells, that implies 16.5-22 million battery cells across the three sites. Taking a conservative average rate of replacement of batteries over a 40-year period of 2.5x, that suggests a total of 41.25-55 million cells. It is difficult to obtain accurate estimates of battery cell failure rates in BESS installations but this is generally quoted as 1 in 10-40 million. This would imply a cumulative risk of 1-6 thermal runaway events across the local area. There are other potential causes of fires in BESS installations to consider. Substations also carry an inherent risk of fire. We conclude that the proliferation of BESS installations constitutes a significant area-wide risk of a thermal runaway or other fire event. Apart from the safety risks to humans, a single thermal runaway event has the potential for toxic effects on livestock and pollution of the Claydon Brook. 2. It has become increasingly apparent that electrical infrastructure has attracted the attentions of 'bad actors' and has become a target for terrorism. The massing of multiple, interconnected installations across a large area with limited security provision renders them vulnerable to such acts.
Q1.11.22 Q1.11.31	Cumulative impacts on soil.	We agree that this is an important point to raise. In our view, the applicant has demonstrated a lack of appreciation of the sensitivity to damage of the clay soils characteristic of the area. Generations of local farmers have developed skills and worked hard to improve the quality and manage the land to best effect but these will be lost. Experience from similar projects elsewhere (e.g. *2020/21 Soil Policy Evidence Programme: The impact of solar photovoltaic (PV) sites on agricultural soils and land quality. Report to the Welsh Government: March 2023*) has highlighted the damage that occurs when using heavy plant and stripping of topsoil that will take decades to overcome. Multiple projects having similar negative

		impacts on soil would have a significant cumulative effect on soil quality, risking the effective sterilisation of an extensive tract of land.
Q1.11.32	Liaison with other projects to minimise impacts.	This is an important question at two levels: 1. The applicant has chosen to adopt a different construction traffic route compared to other schemes, (the AIL route excepted) and has concluded that there would be no interaction between them. This is flawed on two counts. There is no control over routes followed by non-HGV traffic. Furthermore, increased traffic on any part of the very limited local road network has impacts elsewhere. Since there is likely to be overlap in construction periods, it is inevitable that there would be cumulative impacts on traffic. 2. The BESS element of the applicant's scheme has been given Gate 1 status by NESO. It is not clear the extent to which the solar generation element of the scheme is dependent on the BESS but, presumably, there is scope for collaboration with the approved Statera BESS facility. Could such collaboration obviate the need for the applicant's BESS and substation? (See also Q1.18.5).
Q1.13.1	Health Effects Report at annex A of the Health and Wellbeing Summary Statement [REP1-056]	We have submitted comments on this report at Appendix 1 of this document.
Q1.15.14	Visual effects at Bernwood Farm and Sion Hill Farm.	We consider the visual effects of the proposed developments at these two are substantial and significant.
Q1.16.3	Impacts of noise on health and wellbeing.	We consider this to be an important issue. The area is noted for its tranquillity. In our view, the known frequencies and levels of noise associated with the various elements of the proposed development would have a significant impact on baseline and maximum sound levels, the nature of which has high potential to influence health and wellbeing. We refer to this further in Appendix 1.
Q1.16.5	Noise impact on livestock and wildlife.	This is an important aspect of the application which we believe has not received adequate consideration. We welcome the question.
Q1.16.14	Mitigation and monitoring: Outline Construction, Operation and Decommissioning Environmental Management Plans.	We note that at Para. 2.4.3 of **REP1-078** notes that, "*The Interconnecting Cabling Corridor(s) between Parcels 1 and 2 would be up to 25m in width and up to 50m in width between Parcels 2 and 3."* This is an increase from the 25m previously quoted. This reinforces the need for full surveys of the Fields designated as cable corridors in order to understand the impacts of the intervention. Paras 2.9.3 & 2.10.2 commit to managing potential disturbance to livestock and introducing 'temporary measures' to reduce construction noise levels experienced by livestock and Para. 2.22.4 commits to working with Preston Farms/TCS over construction schedule, biosecurity and

educating staff. This is imperative, in particular for Preston Farms/TCS Biosciences but we submit that it should apply to all agricultural activity across the Site.

Table 3.1 – commits to:

- continuous dust monitoring;
- checks for invasive species;
- measures to protect aquatic habitats;
- protection of archaeological assets;
- monitoring of groundwater;
- measures to be taken in the event of uncovering agricultural livestock burial pits (foot and mouth);
- oil interceptors around transformers;
- containment of concrete mixing sites to prevent pollution;
- arrangements for wheel cleaning;
- action in the event of contamination event;
- noise monitoring;
- update to fluvial modelling.

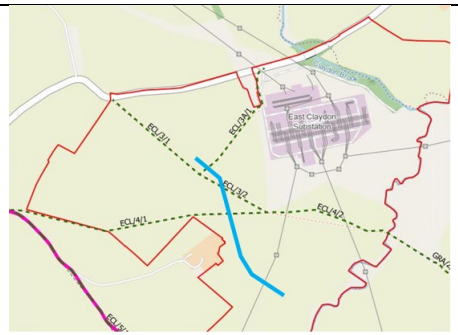
It is not clear to us how these measures would be monitored and enforced.

Outline Site Waste Management Plan

Para. 3.5.1: refers to reuse of soils without the need for permits. It is not clear to us as to the implications of this statement.

Cable and Grid Connection Method

Fig. 2.1 clearly anticipates a cable connection to the proposed replacement National Grid substation. We would ask what surveys has the applicant undertaken in Fields SA51-53 in order to establish the impact of that cable route?

		 In the tracked version **REP1-081**, the commitment at Para. 2.8.6 to restrict noisier activities outside 07:00-08:00 & 18:00-19:00, 07:00-08:00 on Saturdays has been removed, as has the commitment for prior agreement with the LPA for works outside normal daytime hours. It is not clear why these provisions have been removed. In any event, we remain opposed to the proposed working hours.
Q1.18.5	Impact on soil ecosystems	We welcome this question and would seek further clarification that estimates of impacts on soil ecosystems have taken into account removal of large volumes of topsoil and whether loss of carbon sequestration capacity has been included in calculations on the carbon footprint of the scheme.
Q1.19.6	Travel arrangements for construction staff to and from the Site.	We remain concerned that there is no commitment to ensure that staff travelling to and from the construction site will not be required to avoid using routes through East and Botolph Claydon (see Barred Routes at Para. 2.3 of **REP1-084**).
Q1.19.12.	Amendments to the oCTMP (**REP1-084**)	• At Para. 4.11.2 of **REP1-084** the applicant has not explained what checks would be made on contractors with respect to the requirement to check on adherence to speed limits, etc. (This has been a continuing issue with construction traffic associated with the HS2 and EWR projects and so is of particular concern to us). • We can find no response to the request for remediation of footpaths on a rolling basis (rather than waiting until the end of construction works). • There is no evidence of new initiatives on improving safety for pedestrians, cyclists and equestrians on the construction traffic route. • We continue to seek confirmation that the site will not be accessed from the Calvert Road/Three Points Lane junction.
Q1.20.8	Location of energy projects in areas at risk of flooding.	We remain concerned that the applicant's reliance on desktop analyses and modelling fails to appreciate the true risk of flooding in the area. In particular, they do not appear to have taken into account the tendency for the Claydon Brook and its tributary watercourses to overtop or the

	impact of soil-stripping on hydrology in an area where (as they have confirmed at Para. 6.1.6 of **PDA-004**) the capacity for ground infiltration is extremely low. We suggest that the cumulative impacts with other local electrical infrastructure projects require more detailed evaluation.

APPENDIX 1 – Comments on REP1-056: 6.4.2 Environmental Statement Volume 4 - Appendix 5.5: Health and Wellbeing Summary Statement (Rev 2)

1.1 The applicant has provided a summary report, bringing together an analysis of conclusions from various reports on implications for health and wellbeing. We set out here our review of the document and its conclusions.

1.2 At Para. 2.3.4, the applicant quotes Buckinghamshire Council's aims of empowering people to live active and fulfilling lives, emphasis on preventing illness, working to prevent escalation of illness or decline of overall health and wellbeing.

1.3 At 2.3.9 it goes on to say that Buckinghamshire Rights of Way Improvement Plan recognises that PRoWs support better health and help to address health inequalities.

1.4 At 2.3.17 it is noted that the applicant sets out the importance of natural space, connecting blue and green infrastructure to enhance biodiversity, quality of space and attractive cycling and walking routes as key elements as their objectives directly relevant to human health. We **agree** with those objectives but question to what extent they are realised in the proposed development.

1.5 The applicant notes that the general level of self-reported state of health in the area is good, albeit based on very limited area-specific data. What is missing is any consideration of what might contribute to that assessment. We submit that that the rural environment, access to the countryside and wildlife through a network of PRoWs, their tranquillity and dark skies are major contributors to the level of health and wellbeing in the area. However, this has been disrupted in recent years by a number of major infrastructure schemes including the Greatmoor incinerator, HS2, EWR and the Grendon Underwood Prison. These have caused huge loss of areas of countryside and important habitats, degradation of agricultural land, severe damage to the local road infrastructure, (much of which remains unresolved), noise and light pollution, multiple road closures and risks to non-motorised road users from large numbers of HGVs on narrow country lanes.

1.6 All this has caused stress and inconvenience as well as loss of natural assets across the area. The applicant observes correctly at 3.1.2, "*Stress and anxiety within a local population can be caused by a lack of awareness or information about a project and planned construction activities; people can feel they do not have a voice or lack control over how to raise issues and concerns they may have."* This certainly applies to the present case.

1.7 They go on to say at 4.1.5, "*An ever-growing body of research indicates that the environment in which we live is inextricably linked to our health, and whilst the causal links between development and health are often complex, research consistently reports that most health outcomes are influenced by factors other than genetics and healthcare. For example, the design of development can influence physical activity levels, travel patterns, social connectivity and mental and physical health outcomes."*

1.8 Furthermore, at 4.1.15, they note:

- *"Environmental change – e.g. perceptions of visual/open countryside being industrialised – mental health can relate to the control people feel they have over their*

physical environment, for example in relation to topics such as noise4 pollution or air quality;

- *Footpaths, accessibility and active recreation – including PRoW diversions and the impacts these diversions will have on the community's freedom to walk in the local countryside; and noise and amenity value of PRoW.*
- *The potential for mental health effects relating to the loss of employment or socio-economic effects in the agricultural (and supporting) sectors;*
- *The potential for residential amenity to be affected, reducing house prices and financial stability, or reducing the ability to move house."*

1.9 We recognise all of these points as valid and relevant to the issue of health and wellbeing in relation to the applicant's proposals.

1.10 Para 4.2.17 states that, *"Higher sensitivity (or susceptibility) is attributed to those living within view of the Proposed Development, as well as those engaged in outdoor pursuits for whom landscape experience is the primary objective."* What the applicant doesn't appear to appreciate that this applies to almost every resident in the villages surrounding the proposed as well as large numbers from more distant locations. The countryside, accessed through the PRoW and local road networks is the lifeblood for a large population.

1.11 Of course, the countryside is also the lifeblood of the farming community that provides food, maintains habitats, hedges etc. as well as, uniquely in the present case, producing vital animal products that serve the health services and biotech industries. It is widely acknowledged that the farming community is currently under huge stress from economic, environmental and a whole range of other pressures. As a group, they are recognise as one of the most vulnerable groups from a health and wellbeing perspective.

1.12 Against this background, at 4.2.3.1 the applicant concludes that the vulnerable population groups (sensitive receptors) relevant to this assessment are:

- Children and young people;
- Older people; and
- People with existing poor health (physical and mental health).

1.13 This ignores the farming population (a consistent theme throughout the application), although it is acknowledged at 4.2.34. The important point overall is the failure to recognise that, because of the dependence of local communities on access to the countryside as a key aspect of their health and wellbeing, **ALL** of the local population should be considered as vulnerable and, therefore, sensitive receptors.

Mitigation

2.1 Para. 6.1.20 states that "*Committing that normal working hours will be between 7am to 7pm from Mondays to Fridays, and 7am to 12pm on Saturdays"* would minimise impacts on local communities. We have consistently stated that these working hours are an unacceptable intrusion on local communities. It also fails to note that access to the site would extend to one hour before and one hour after the core times (i.e. 06:00 – 20:00). This is not acceptable.

2.2 As regards construction work noise: Para. 7.2.2 concludes no significant impact because exceedance above 65 dB LAeq,T is not anticipated. This ignores the value of tranquillity in the local environment. As well as impact on residential amenity it would be a major deterrent for users of PRoWs.

2.3 Operational noise – Para. 7.2.8 states, "*During the operational (including maintenance) phase, ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] reports that no sensitive receptor would experience daytime lowest observed adverse effect level (LOAEL) exceedances as a result of noise associated with the Proposed Development."* Having visited other electrical infrastructure sites, it is clear that the level of noise in operation is highly intrusive and a further deterrent to the use of PRoWs.

2.4 However, the applicant does acknowledge that several residential properties would be adversely affected by noise at night.

2.5 At Para. 7.2.11 it is further acknowledged that, "*As such, without additional mitigation, there would be the potential for noise to translate into significant adverse effects on health and wellbeing for some receptors in some locations, during some times of the day – this could result in both physical and mental health pathways being affected, if not addressed through additional mitigation."* However, many of the measures outlined in Paras 7.2.12-7.2.18 are 'soft' in that they are not easily enforceable and the proposed physical measures are unproven.

2.6 We **disagree** with the conclusion at 7.2.26 that, "*Very low or small scale exposure to changes, a small minority of the population affected, and immediate reversal on completion of the construction phase*." As noted above, a majority of the local population would be affected.

2.7 Given the importance of access to the local PRoW network and its inherent tranquillity, we **disagree** with the conclusion at 7.2.28 that, "*the significance of the effect of noise as a determinant on physical and mental health and wellbeing is considered to be:*

- *Minor adverse and not significant during the construction and decommissioning phases; and*
- *Minor adverse and not significant during the operational (including maintenance) phase*."

Visual amenity

3.1 Para. 7.3.3 concludes: "*Landscape and Visual [EN010158/APP/6.2] [APP-053] therefore reports* ***significant major or moderate adverse*** *visual effects during the construction and decommissioning phases at the following receptors likely to be accessed by people for recreational purposes, taking into account all mitigation proposed:*

- *Six PRoWs (including North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3); and*
- *Hogshaw Farm and Wildlife Park."*

3.2 We **agree** with this assessment but reject the 'not significant' assessment of impact on other elements of the local road and PRoW network. The nature of a network is that roads and PRoWs are linked and experienced in a dynamic sense, not limited to a single viewpoint, so acceptance of significant effects in one area applies across the board.

3.3 Para 7.3.19seems to suggest that the applicant considers that provision of new ProWs somehow brings overall beneficial effects whilst ignoring the fact that there is little attraction to walking through fenced corridors in an industrial landscape.

3.4 It is difficult to understand the rationale for the conclusion at 7.3.27 that there are "*no significant effects on residential properties and their inhabitants"* when an existing view of open countryside from a property is transformed into an industrial site.

3.5 In our view, the overall conclusion at 7.3.28 that the effect on visual amenity at all stages would be "*Moderate Adverse and potentially Significant*" underestimates the true impact.

3.6 Para. 7.4.13 concludes that, when considering changes in traffic, transport and access (including access to the natural environment for active recreation) during construction and decommissioning, *"As a result, before additional mitigation, during the operational phase there is likely to be an overall enhancement of accessibility within and between residential areas and communities and their facilities, which is likely to contribute positively towards the determinants of physical and mental health (notwithstanding effects relating to recreational use of PRoW, which is considered in terms of landscape and visual amenity."* This is not a defensible position given the levels of disruption caused by the development.

3.7 Scoping out the implications of the proposed development on the motorised highway removes proper evaluation of fear and intimidation of motorised and non-motorised users of country lanes in the face of greatly increased traffic flows, especially HGVs. It ignores damage to roads and verges and the potential for large numbers of vehicles to use non-designated transport routes through the villages. Together these factors have major implications for the health and wellbeing of local communities.

Socia-economic environment

4.1 Para 7.5.2 recognises that the proposed development would have a long-term impact on agricultural capacity and loss of jobs in agriculture (Para 7.5.4). Para. 7.5.6 goes on to argue that financial or land-swap agreements with tenants are such "*that effects on viability of agricultural and non-agricultural businesses would not be adversely affected, and therefore changes to employment supported would be limited."* The requirement for tenant farmers to leave properties that may have been in their family for generations and to lose their livelihoods is not compensated by financial agreements. The applicant has accepted that the farming community is under huge pressure and is a highly sensitive group in terms of health and wellbeing. We fundamentally **disagree** that they would be unaffected. This is disingenuous and a flawed position. The impact on the health and wellbeing of local tenant farmers can only be assessed as **Major Adverse** and **Highly Significant** <u>not</u> "*slight adverse (not significant)"* as concluded in 7.5.10.

4.2 Neither is the magnitude of change *"small to medium"* as described in 7.5.18. The recent loss of a single tenant farmer had a profound effect on the local community. It is incorrect to conclude that very few people are affected by such an event.

Major accidents and disasters

5.1 The applicant asserts that the risk of battery failure, and hence the risk to the population, is very low. They also conclude that, based on assumptions regarding prevailing winds, that in the event of a thermal runaway, few receptors would be at risk of toxicity. However, meteorological data are derived from monitoring stations far removed from the site and it is well-known that, locally, the wind direction can be highly variable, depending on the time of year and so we remain sceptical of the applicant's conclusions.

National health

6.1 Unusually, the proposed development has the potential for **Highly Significant** risk to health and wellbeing on a national, even international scale. Were the highly regulated

and manged livestock associated with Preston Farms/TCS Biosciences to suffer from stress, accident, biosecurity breaches or the toxic products of a thermal runaway event, there would be major adverse effects on the supply of diagnostic and other reagents to the health services and biotech industries. This is one of the most important risks associated with the scheme and yet is has received little attention from the applicant.

Cumulative impacts

7.1 The applicant has concluded that inter-project cumulative effects for factors such as water contamination or major accident are not significant because each project will have its own mitigation in place. This is false logic. Notwithstanding mitigation measures, each project carries a real risk of accident/adverse incidence and so, together, there is clearly a cumulative risk.

7.2 It is noted that the cumulative impact with the proposed replacement National Grid substation has been considered in relation to effects on visual amenity in this report having been largely ignored in earlier submissions by the applicant. This proposed development has major implications especially for residents in East Claydon and properties associated with Monkomb Farm, Station House and Sion Hill Farm as well as residents of Granborough and needs be addressed in terms of all aspects of cumulative impacts not least being visual amenity and noise.

7.3 As regards transport issues, the applicant has concluded that since different construction traffic routes would be adopted for other infrastructure projects, there would be no cumulative impacts. This is a fallacious argument. The whole local road network needs to be considered. Currently, the applicant would apply no constraints on non-HGV traffic associated with the development. Added to this, alternative routes in the area are so limited that a small disruption at one location can lead to major impacts across the network.

7.4 Cumulative loss of land has numerous consequences, not least of which are the adverse effects on the farming community discussed above. We **disagree** with the conclusions at 8.5.13 that:

"a) Any cumulative assessment of the potential impact on the agricultural economy is hypothetical and does not consider individual landowner agreements could safeguard the employment supported by landholdings by moving the employment and or productivity to a nearby site

b) Any project developing on agricultural land would be subject to a consideration of statutory compensation relating to the operation of resident agricultural operations.

c) Uplift in other sectors (construction and energy – see below) will occur, which is a normal activity within any economy. Employment in these sectors will be supported by individual project commitments for promoting local skills and employment as required by NPS EN-1."

7.5 This displays a fundamental lack of understanding or interest in the farming community and the interdependencies with local communities.

7.6 However, we **agree** with the conclusion at 8.6.6 that there would be *"a large adverse significant effect from the six cumulative developments on soil."*

7.7 We submit that the conclusion at 8.7.1 that *"The Proposed Development and cumulative schemes considered are not considered to result in additive effects that would combine to increase the level of effect on individual receptors to a significant scale across most relevant determinants of health (including noise, air quality, land and water*

contamination, transport and access and socio-economics)" is not supported by the data provided or any close examination of the applicant's proposals.

Conclusion

8.1 Having reviewed the applicant's position on the health and wellbeing impacts of the proposed development, we submit that negative impacts on the health and wellbeing of local communities have been underestimated as regards:

- Visual amenity, noise, tranquillity associated with the open countryside and PRoW network;
- Recreational space;
- Residential amenity;
- Socio-economic effects, especially in relation to the farming community and their interdependencies with the local populations;
- The unique dependency of national health services and biotech industries on local agricultural and related businesses;
- Transport and traffic issues;
- Cumulative impacts with other infrastructure projects.