

# **Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield Solar Farm project**

## **Issue Specific Hearing 1**

### ***Comments on behalf of East Claydon Parish Council***

#### **Item 2: Need, Site-Selection and Site Layout**

- 1.1 The applicant indicates that a revision downwards of its proposed grid connection from 500MW to 335MW had been requested but had not yet been agreed.
- 1.2 It was further stated that the BESS element was proposed primarily for storage of electricity generated from the solar installation. Nevertheless, the proposed 335MW connection to the grid would allow import as well as export of electricity.
- 1.3 The applicant explained that the business case for a BESS facility based purely on commercial arbitrage was no longer an attractive proposition.
- 1.4 In response to questions, the applicant indicated that a total battery storage capacity of around 1GWh was planned.
- 1.5 It was noted that, whilst the solar element of the proposal had been given Gate 2 status (details to be confirmed late 2026/early 2027), the BESS element had Gate 1 status only. The applicant acknowledged that future inclusion of the BESS as a Gate 2 element remained uncertain.
- 1.6 Approval on appeal was granted to the planning application for the (Statera) East Claydon BESS adjacent to the existing National Grid substation. This awaits confirmation of connection availability to the proposed replacement National Grid substation. The Statera BESS is proposed as having 3.5GWh storage capacity together with a dedicated substation adjacent to the Claydon Brook.
- 1.7 Given the potential availability of the East Claydon BESS storage capacity (>3 times that proposed for the present application), the applicant's assertion that the concept of commercial arbitrage for electricity offers diminishing returns, and the huge wastage (around 15%) of energy involved in the round-trip process, has the applicant explored the possibility of linking to the Statera site for storage of solar-generated electricity and for connection to the National Grid through the associated substation? This would obviate the need for the applicant's BESS and substantially reduce the GH footprint of both projects.

#### **Item 3: Ecology and Biodiversity**

- 2.1 The applicant has undertaken various ecological studies on land parcels 1, 1a, 2 and 3 but not on the remaining areas within the Order Limits, relying on an unspecified process of 'extrapolation' from those surveys to inform the other fields. In taking this approach, the applicant has no clear basis for determining the extent to which any given species may be present in non-surveyed areas and subject to displacement or their potential for accommodating displaced species from Parcels 1-3.

- 2.2 By way of example, other local proposed projects immediately adjacent to, or nearby the Order Limits, have identified skylark territories that would be displaced as follows:
- Longbreach solar – 16 territories lost
  - Tuckey Farm solar – 16 territories lost
  - Statera BESS – 4 territories lost
  - Statkraft BESS – 6 territories lost
  - National Grid substation – known to include skylark territories but not reported. (Note that this includes fields within the applicant's Order Limits but has not surveyed).
- 2.3 The absence of a baseline database for the non-surveyed areas means that there can be no confidence in the applicant's conclusions on habitat losses and gains.

#### **Item 4: Water Environment**

- 3.1 The applicant proposes three access points to the site:
- Gate A – across Fields D44-45;
  - Gate B – across Field SA46
  - AIL access via Fields SA55-56.
- 3.2 The applicant was asked to explain why these access points were chosen and how they plan to manage the access routes (including crossing the relevant fields and the damage that would ensue), when each was subject to known significant surface water flooding issues.
- 3.3 The applicant undertook to respond further on these points.

#### **Item 6: Cultural Heritage**

- 4.1 The setting of a Listed building or conservation area makes an important contribution to its heritage value. It was apparent during the Accompanied Site Inspection that there are clear and important views of Claydon House from Knowl Hill. Were the proposed solar installation to proceed, those views would be set in the foreground context of an industrial landscape that would detract substantially from the existing rural setting.
- 4.2 Recent archaeological investigations by the applicant (**APP-108**), by Statera (Planning Application 23/03875/APP) and Statkraft (Planning Application 25/01297/APP) have identified extensive Iron Age/Roman artifacts together with evidence of the possible route of a former Roman road.
- 4.3 The area to the north and east of East Claydon includes the site of a former medieval platform village and is subject to an Archaeological Notification Area (East Claydon Mediaeval Earthworks; [East Claydon Medieval Earthworks - Buckinghamshire's Local Heritage List](#)).
- 4.4 National Grid has undertaken archaeological investigations across Fields SA52-54 and SA57-59 (within the applicant's Order Limits) but has not published its results.
- 4.5 It would be helpful if the applicant could secure access to those results so that the applicant's own findings together with those of other proposed infrastructure projects

so that the extent and value of hidden heritage assets are put in context alongside the East Claydon Medieval Earthworks.

- 4.6 It was noted during the Accompanied Site Inspection that Field SA15 (alongside the drive leading to the Grade II-Listed Muxwell Farm) is one of the best-preserved examples of ridge and furrow field profiles in the area.
- 4.7 The applicant's proposal to traverse this with an access track (as well as ridge and furrow Fields SA16-17 – see figure below) will seriously compromise both the integrity of this asset and the setting of Muxwell Farm which cannot be recovered.



(Left) LIDAR image showing ridge and furrow profiles in Fields SA15-17 [[Aerial Photo Explorer – Over 400,000 aerial photos in Historic England's digitised collections | Historic England](#)]; (Right) Illustrative Layout Plans and Drawings Sheet 3 of 9 (REP1-007). Proposed internal track shown in brown.

## Item 7: Transport and Access

- 5.1 The applicant states that non-motorised users have been assessed in **APP-058**. However, passing references to cyclists at 15.6.16 and Table 15.14 (p29) are superficial at best. The overall impact on non-motorised road users is judged to be **Minor** and **Not significant**, this despite thresholds for 'fear and intimidation' being exceeded by a considerable margin.
- 5.2 Could the applicant please direct us to their data showing the numbers of pedestrians, cyclists and equestrians using the local roads and how they justify their conclusions on residual impacts?

## Item 8: Population

### (a) Effects on agricultural businesses and non-agricultural businesses

#### *Biosecurity*

- 6.1 Any disease introduced onto local farms, be it one affecting animals or plants, has important and potentially catastrophic impacts for agricultural businesses as well as presenting threats to human health through introduction of zoonotic diseases.
- 6.2 The risk of spread of such diseases has increased with changes in international trade and travel. As regards diseases endemic to the UK, control of their spread is frequently dependent on culling of affected animals and restrictions on the movement of live animals and animal products.
- 6.3 All agricultural businesses are exposed to some level of risk. This is managed by a range of practices, including physical biosecurity measures. However, the risk is greatly increased where there is a change in access to landholdings in terms of numbers of vehicles, humans and non-farm animals, originating from uncontrolled sources (including overseas) or unknown access to other farms, etc.
- 6.4 The emergence of a new foot and mouth serotype in various locations across China has raised concerns as to the possible spread of the disease to other countries ([FMD in China 1 April 2026.pdf](#)). In China, seroprevalence (i.e. number of animals having antibodies) for *Brucella abortus* (the bacterium causing brucellosis in cattle), ranges from 1-2% but is >20% in some provinces (e.g. [Full article: Brucellosis seroprevalence in cattle in China during 2014–2024: a systematic review and meta-analysis](#)). The disease is transmissible to humans.
- 6.5 The UK Government does not permit importation of a range of food and animal products from China in an effort to prevent these diseases being transmitted to livestock in this country.
- 6.6 Importantly, both the foot and mouth virus and brucellosis bacterium can survive for extended periods on fomites (inanimate objects or surfaces). Whilst it is acknowledged that the likelihood of transmission on certain manufactured goods such as solar panels and battery cells produced in controlled factory environments is low, there is a substantially greater risk from the likes of shipping containers and the vehicles used for transportation of materials to docks for export.

- 6.7 The UK is currently free of brucellosis and foot and mouth disease, although there are concerns over potential threats from outbreaks of foot and mouth disease in Greece and Cyprus.
- 6.8 The level of risk needs for import of disease needs to be assessed by the applicant in the context of the numbers of vehicle and personnel movements, especially during the construction period, but throughout the lifetime of the proposed project.
- 6.9 The applicant then needs to explain how they propose to eliminate the risk of importing animal and plant diseases through the vector of goods imported from countries with a high prevalence of such diseases.
- 6.10 Perhaps the greater risk to livestock within and adjacent to the Order Limits arises from diseases that are currently of concern within Great Britain. For example, there have been 339 cases of bluetongue in the 2025 to 2026 season (since 1<sup>st</sup> July 2025). This disease affects ruminants (cattle, sheep, goats, etc.) and camelids (llamas and alpacas). The distribution of cases for 2025-6 is shown in the Animal and Plant Agency map ([Bluetongue Cases and Zones](#)). It will be noted that this includes zones through which construction traffic for the proposed project is likely to pass.
- 6.11 The principal vector for bluetongue is a biting midge. They can be carried on the wind but they can also 'hitch-hike' on vehicles, earth-moving equipment etc.
- 6.12 Outbreaks of equine flu in the UK are of particular concern at present. There has been a sharp increase in the number of cases since April 2026 ([Equiflunet Viewer](#)). Although the principal route for transmission is through airborne virus from coughs, it can be carried on surfaces such as vehicles ([HBLB International Codes of Practice | Transmission](#)).
- 6.13 Whilst it may be argued that the risk of introduction of any infection by any individual vehicle or member of staff working on the site is relatively low, the cumulative risk from hundreds of vehicles and staff coming and going on a daily basis during the construction period is substantial. The applicant's estimates of vehicle movements just accessing Parcel 3 suggest that, over a 30-month construction period, there would be up to 200,000 vehicle movements. A further 128,000 vehicles are anticipated to access Parcels 1, 1a and 2 via Gate A. Assuming up to 600 construction staff on-site, there could be more than 400,000 individual staff visits over the same period (pdf Page 49, **APP-131**) a total of 728,000 'events'.
- 6.14 At its most simplistic level, if the same level of risk were attached to each personnel and vehicle movement, this means that even a 1 in 728,000 chance event could occur during the construction period.

What is the applicant's estimate of the risk associated with these movements with respect to importing of disease that would affect livestock within and adjacent to the Order Limits and how do they propose to limit that risk?

### **Noise and other stressors**

- 6.15 The applicant asserted that they had not been given sufficient information to judge potential impacts of their proposed development and associated activities on livestock and, in particular, on animals in the care of Preston Farms and TCS Biosciences.

- 6.16 It is well-known to any individual using the country's roads that particular care is needed when encountering animals and, in particular, horses. They will be aware that the Highway Code makes a large number of references to the measures to be adopted to ensure safety. Rule 215 states, "*Always pass wide and slowly. When you see a horse on a road, you should slow down to a maximum of 10 mph. Be patient, do not sound your horn or rev your engine. When safe to do so, pass wide and slow, allowing at least 2 metres of space.*" and, "***Do not forget horses are flight animals and can move incredibly quickly if startled.***"
- 6.17 Horses being ridden on roads will be relatively accustomed to traffic. Nevertheless, they still require exceptional care and respect from other road users. It is self-evident, therefore, that animals managed in free-grazing herds will be far more sensitive and vulnerable to any disruption in their environment. This can be sudden movements or noises, flashes of light or the presence of unfamiliar people or animals.
- 6.18 This vulnerability is not limited to horses. Anyone who walks through the countryside will be aware that sheep and cattle are easily alarmed.
- 6.19 Panic resulting from initiating the flight reaction can lead to animals self-harming by running into obstacles, colliding with one another or falling.
- 6.20 None of this should be a surprise to the applicant and it would be reasonably expected that they would have considered this in detail during the site selection and design process.

#### ***Behavioural and physiological changes resulting from stress***

- 6.21 There is an extensive literature on the impact of stress on livestock, both in terms of behavioural and physiological changes. This information is in the public domain and so is readily accessible to the applicant.
- 6.22 As regards impacts on behaviour, a survey of 409 out of 1,836 horse owners in the UK and USA reported anxiety behaviours in response to a variety of noise disturbances including fence/box walking, running, appetite loss, diarrhoea, breaking fences, weaving, bucking, sweating, fever, trembling and vocalization (*Riva, M.G. et al., The Impact of Noise Anxiety on Behavior and Welfare of Horses from UK and US Owners' Perspective. Animals (2022), 12, 1319. <https://doi.org/10.3390/ani12101319>*).
- 6.23 In response to points raised at ISH1, the applicant dismissed as irrelevant the example of responses of horses to noise from fireworks. This misses the point. A stimulus as simple as opening an umbrella can elicit a measurable response as indicators of stress in the saliva of horses (*Contreras-Aguilar, MD, et al., Changes in Saliva Analytes Correlate with Horses' Behavioural Reactions to An Acute Stressor: A Pilot Study; Animals 2019, 9(11),993*). Certainly, noises such as (e.g.) a tipper truck discharging a load of gravel could easily precipitate a stress response in horses. A stress response in one animal will transmit rapidly to other members of a herd.
- 6.24 It is important to note that stress-induced behavioural changes in livestock have consequences, not only for the welfare of the affected animals, but also for the welfare of those responsible for their management. A stressed animal may be difficult to handle, especially when on close contact with an individual responsible for its management, and so presents safety risks for that individual.
- 6.25 In a controlled study of the effects of stress in horses, (*Nowak, AC. et al., Investigating the interplay of stressors and health in horses through fecal cortisol metabolite*

*analysis. Front. Vet. Sci., 2025; Sec. Animal Behavior and Welfare; Vol. 12*), faecal cortisol (a surrogate marker for blood levels) was found to be elevated in response to various stressful stimuli. Cortisol is a recognised physiological marker of stress and has a bearing on the composition of blood (see 6.28).

- 6.26 The impacts of stress on farm livestock are not limited to horses. The nature of livestock management across the area included within, and adjacent to, the Order Limits is non-intensive. Animals are kept in open fields in an area noted for its tranquillity with very limited exposure to stress. Paradoxically, this makes them more vulnerable to abnormal/unfamiliar stimuli. Stress can affect growth rates, milk production in cattle and the quality of their meat.
- 6.27 Raised cortisol levels have a number of important physiological consequences across animal species. This includes changes in behaviour, reduced immunity to infection, negative impacts on reproduction and changes in blood coagulation properties (*Sikorska, U. et al., Role of Cortisol in Horse's Welfare and Health. Agriculture 2023, 13, 2219. <https://doi.org/10.3390/agriculture13122219>*).
- 6.28 Raised cortisol levels (together with other stress-related hormones) leads to a hypercoagulable state (i.e. increased tendency to clot) and are associated with increases in other blood-borne chemical mediators of inflammation (*Obeagu, El. Stress-induced hemostasis: mechanisms and implications for health. Annals of Medicine & Surgery; 2025; 87:3300–3309*). Clearly, this has important implications for any blood-related products derived from a stressed animal.

### **Adherence to Home Office Regulations**

- 6.29 The author has experience of working in environments subject to both Home Office and Medicines and Health Regulatory Authority regulations, and so is cognisant of the responsibilities placed on licensees and the rigour with which the regulations are overseen and enforced.
- 6.30 Relevant Home Office regulations are not limited to biosecurity measures. The core principle is the welfare of animals, their health, avoidance of stress and, for anyone interacting with them at any level, demonstration of high standards of overall care and respect for them as sentient beings.
- 6.31 It is surprising that the Applicant, knowing the nature and importance of local businesses, did not include consideration of these matters in their initial due diligence during the site selection process. Nevertheless, even at this late stage, it is surely incumbent on the applicant to consider how (a) they would ensure that none of its proposed activities would breach Home Office regulations and (b) respect and protect the licence-holders' legal obligations during all phases of its proposed scheme.
- 6.32 The applicant proposes at Para. 2.22.4 of **REP2-059** the "*Provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above*" [i.e. requirement to provide advanced notice of construction work near Preston Farm's grazing land and biosecurity measures].
- 6.33 Noting that some construction staff may not have a good command of English or may come from environments where animal welfare is not afforded high priority, a question we suggest the applicant should be asking of themselves is:

If the Home Office were to conduct an unannounced visit to Preston Farms/TCS Biosciences, is the applicant confident that any individual member of staff, picked at random from those working on site in any role (construction, operation or decommissioning stages), would be able to give a full account of the 'Toolbox' working practices and demonstrate that they are adhering to them?

### ***Agricultural Tenants***

- 6.34 Agricultural tenants are a key element of integrated rural communities and have established farming practices that respond to local conditions, having developed skills over multiple generations. It is notable too that, as was evident from the Accompanied Site Inspection, common themes amongst local farmers are exceptional standards of animal welfare and an understanding as to how manage the clay soils to achieve high quality pasture and good crop levels from areas laid to arable.
- 6.35 It is regrettable that the applicant has failed to grasp these qualities, the value of tenant farmers and the consequences of their proposed development on them. Rather, during ISH1 their plight was dismissed as simply being in the gift of the landlord to determine how their landholdings are utilised.
- 6.36 It is widely recognised that the farming community is amongst the most vulnerable in the country as regards isolation and mental health. East Claydon Parish Council is particularly concerned about the impact of the proposed development on the local farming community, both within and outside the Order Limits.
- 6.37 It is notable in **REP2-033** (Tables 14.25 [pp.125-131]), that the applicant identifies agricultural businesses as being **Very High** sensitivity but goes on to conclude that the magnitude of change (during construction, operation and decommissioning) is **Minor** and the residual effect **Slight Adverse** and **Not Significant**. Even applying a simple 'sense test' it is difficult to see how the applicant arrives at that conclusion.

### **(b) Provisions for Grazing**

- 6.38 The applicant has proposed that, during the operation phase, grazing of animals would be enabled in those fields with solar panels installed and in five areas specifically set aside for that purpose **REP1-086**, Para. 3.3.27 and Appendix 5a, Part 7 (p125).
- 6.39 Throughout the applicant's documentation, the nature and extent of such grazing arrangements is consistently qualified by caveats such as 'may be', 'where possible' and 'could be'. Para. 5.2.35 states that marginal vegetation around ponds "*will be managed through grazing or a cutting regime*". Which is it to be?
- 6.40 The five areas designated in Appendix 5a are of markedly different sizes and scattered across Parcels 1, 1a and 2 without any clear connection between them. There appears to be no statement as to their suitability as regards stock-proof fencing, water supplies, movement of animals between them and biosecurity.
- 6.41 Para. 5.2.6 suggests that these fields would be operated on a 3-year cycle which implies that, for most years, two of the fields would be unavailable for grazing.
- 6.42 What thought has been given to the need for regular rotation between grazed areas?

- 6.43 Para. 5.2.23 refers to '*commercial grazing by sheep*' but presents no evidence that this is a commercially viable proposition.
- 6.44 Para. 5.2.4 states that grazing in and around panels will involve sheep. Table A4.1 (p114) refers to sheep grazing under solar panels during autumn and winter at low stocking densities, but notes that animals may have to be moved if it gets too wet.
- 6.45 Most sheep currently farmed in the area are pregnant ewes. Good quality pasture, adequately drained with access to supplementary fodder is needed for ewes and their lambs. Fields in Parcel 2, previously laid to arable crops by the tenant farmer already required to surrender the land, was carefully and productively managed. This included drawing mole drains on a 3-4 year cycle. Even so, standing water is a regular feature of those fields following heavy rain and the tenant was careful to avoid any working of the land during those periods.
- 6.46 Installation of solar panels will result in loss of that drainage system and the land is likely to become boggy for much of the winter which, as the applicant acknowledges, would make them unsuitable for grazing sheep.
- 6.47 The applicant has indicated that they would be responsible for managing grazing. How would they undertake that commitment?
- 6.48 The concept and practicalities of grazing, to be managed by the applicant, be it in open fields or amongst solar panels, has not been thought through nor has it been presented as a realistic option. Indeed, there is no commitment by the applicant for grazing to be part of the scheme.

### **Item 10: Noise and Vibration**

- 7.1 During ISH1, the applicant's assessment of the impact of noise on various receptors drew largely on Weighted Equivalent Continuous Sound Levels to compare impacts of the proposed development over baseline sound levels.
- 7.2 This doesn't provide a complete picture since occasional, but nevertheless intrusive sounds, do not influence reported levels averaged over an extended period. This is of relevance both to human and livestock receptors.
- 7.3 The applicant has put forward a confused logic whereby it is argued that locating the proposed BESS in Parcel 3 would be unacceptable because of the cumulative impact of the noise it emits but then considers that the current proposal to locate it in Parcel 2 is acceptable.

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I confirm that AI was not employed in the drafting of this document.

██████████ on behalf of East Claydon Parish Council.

May 2026