

East Claydon Parish Council

Application by Rosefield Energyfarm Limited for the Rosefield Solar Farm

Comments on the Applicant's Responses to Deadline 2 Submissions (REP3-051)

The following are the Applicant's responses to East Claydon PC's comments submitted as **REP2-094**:

Ref.	Summary point	East Claydon Parish Council's Response
5.11.1	Statement of need. GHG emissions from the BESS.	We disagree that the applicant has set out a convincing, evidence-based statement of need. The Gate 1 status of the BESS element is a clear indication that the case is not made. The Applicant only disclosed the proposed storage capacity of the BESS as recently as ISH1. There appears to be no allowance for the round-trip losses (~15%) in the calculations for GHG emissions associated with the BESS [APP-051]. Irrespective of whether storage capacity were to be employed for local, solar-generated power as part of commercial arbitrage for energy imported from the grid (the source of that energy being unknown), these are substantial losses and should be factored into the GHG calculations.
5.11.2	Comments on the solar road map.	The Applicant consistently avoids making firm commitments to livestock grazing, either in fields with solar panels or in non-developed fields. The practicalities of those arrangements have not been addressed (see also under 5.11.3). The stated benefits to the community are largely comments about national rather than local matters. The proposed 'Community Benefit Fund' [REP1-16; Paras 3.3.5-7] would not mitigate the negative impacts on local communities and, as the Applicant notes, this is not a matter to be considered in the Planning Balance. The Applicant considers that local communities have been central to the Proposed Developments design development but fails to recognise the harm done through impacts on tenant farmers.
5.11.3	Sheep and cattle grazing is no more than a proposal. Further comment noting that with the loss of tenant farmers, who would be responsible for ensuring grazing	We find no statement of commitment to grazing in Requirement 7 of the Draft DCO 3.1.6 Draft Development Consent Order (Clean) (Rev 6).

persists over the operation phase of the Proposed Development?	The Outline LEMP [REP2-067] only makes non-committal statements, such as 5.2.3 of REP2-067, which states “<i>Opportunities for grazing will be considered where practicable and is viable with details such as timings and stocking densities to be provided in the LEMP(s) at the detailed design stage. If grazing is not possible, light scarifying every three years after the hay cut will help mimic light poaching creating gaps for new species to colonise.</i>” Table A4.2 (pdf pages 114, 117, 120) repeatedly refers to ‘Grazing Option’.
5.11.4 Staff Travel Plan: Lack of control over use of local roads by staff minibuses or private vehicles.	AS regards staff travel, the Outline CTMP [REP2-065] at Para. 4.10.1 refers only to the following: • Staff bus service for transport of Site staff from Bicester and Aylesbury, with pick-ups from the mainline rail stations, accommodation/hotel areas and park & rides sites; • Promotion of a car sharing scheme. The Applicant comments only on controls over construction traffic. We can find no commitment to measures to ensure that staff minibuses and private vehicles travelling to the site will be required to avoid local villages or that this would be enforced.
5.11.5 ExA’s question Q1.7.1 on Adequacy of Applicant’s response to relevant representations made by East Claydon Parish Council).	<i>Importance of agriculture and its interdependencies across the communities.</i> The Applicant simply reiterates that they have undertaken relevant assessments and so our position remains that the assessment is inadequate, and that it shows little understanding of local agriculture or those engaged in it. <i>Specifically, the local and national importance of Preston Farms/TCS Biosciences.</i> Preston Farms and TCS Biosciences have made clear their positions and are best-placed to do so. At ISH1, senior personnel in relevant sections of the Health Services emphasised the national importance of TCS Biosciences products and the consequences of disruption to supplies. However, the general point made above about the importance of agriculture, applies and we would draw attention to our further observations in REP3-058 (Item 8; pp6-10) where we consider that the Applicant has failed to understand or respond to the needs of local farmers in general and to Preston Farms in particular. <i>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.</i>

The Applicant seems to be implying that the perceived 'improvements' to PRowS somehow negate the overall harm to the network that would result from the proposed development. This is not a logical or defensible position.

We cannot overemphasise the importance of the PRow network to local communities as their principal amenity and source of health and well-being. We invite the Applicant to walk the network, noting along its entirety the true impact of the resulting industrialisation of the open countryside.

Importance of tranquillity, contact with the countryside and wildlife, dark skies to health and wellbeing and residential amenity.

The Applicant asserts that these issues have been addressed. They refer to comments at 9.1.38 of **REP2-086** where *"It is recognised that experience of the natural environment through recreational and other use of PRow is an important aspect contributing to mental and physical health and wellbeing."*

Ref. 9.1.16 does note, *"It is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development resulting in some significant adverse effects on landscape character and the visual amenity of PRow."* However, rather than acknowledging the overwhelmingly negative impacts of the proposed development, the Applicant goes on to emphasise that (in their estimate) *"Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing."*

The Applicant has simply reiterated their previous position. Their assessment of overall impact also fails to recognise the cumulative effects with other infrastructure projects.

Critical contribution of the surrounding countryside to the setting of key heritage assets and conservation areas.

The Applicant refers to Ref. 3.3.2 of **REP2-086** which states, *"These changes have ensured that the Proposed Development has minimal visibility from the Conservation Area and that the Conservation Area would continue to be experienced within a largely agricultural setting on the approaches from the west and north."* It's not clear how 'minimal visibility' has been defined but it is clear that a number of important views from properties and other viewpoints from within the Botolph Claydon Conservation Area will be significantly impacted **as will views towards the Conservation Area** from local roads and PRowS, thus having an important negative impact on its setting.

		At Ref 7.3.1 of REP2-086, the Applicant reiterates their position that “<i>the Proposed Development would not result in the creation of an industrialised landscape.</i>” We reject this comment as indefensible. As regards the socio-economic impact of the proposed development on tenant farmers, this has been addressed by the Applicant at Refs 9.2.1 and 9.3.4 purely in terms of potential financial compensation. There is no consideration of the human cost, loss of generations of skill and expertise or the effects on the wider communities. <i>Grazing</i> The Applicant states that “<i>the commitment</i>” [our emphasis] to sheep and cattle grazing is set out in REP2-067. We would be grateful if the Applicant could direct us to their statement of commitment. Reference to “<i>Appendix 6 of Outline LEMP [EN010158/APP/7.6.3] [REP2 067] (see page 121).</i>” seems to conflate ‘propose’ and ‘commit’. <i>Topography</i> The Applicant misses the point. The question is, “How does the Applicant justify the choice of site in view of the topography of the land within the Order Limits, given that its undulating nature and several north-facing slopes render it less than ideal for a solar energy scheme?”
5.11.6	Failure to undertake ecological and other surveys outside Parcels 1, 1a, 2 & 3.	The Applicant maintains their position that habitats in the non-surveyed areas can be extrapolated from the surveyed sites and that, in any event, any disruption to the cable routes would be ‘temporary’. We maintain our disagreement with this approach.
5.11.7	Actual installed capacities for solar and BESS.	The Applicant states that the installed solar capacity would be 334.1 MW and, in response to our request at ISH1, it was indicated that the working assumption for the BESS capacity was 1 GWh. It would be helpful if the Applicant could explain how this figure was arrived at. What is the assumed balance between storage of solar-generated energy and electricity imported from the grid?
5.11.8	Incorporation of the results of archaeological studies by National Grid into the Applicant’s overall assessment of hidden heritage assets.	It is noted that the Applicant has committed to this (reaffirmed at ISH1). Given that the National Grid survey area is included within the Applicant’s Order Limits, it is surprising that this has not been pursued with greater urgency.

5.11.9	Impacts on built heritage assets in East and Botolph Claydon and their settings, included cumulative impacts.	The Applicant's statement that <i>"The cumulative effect of the Proposed Development in combination with the proposed National Grid Substation and other developments is not considered to increase the level of harm compared to the Proposed Development in isolation."</i> is not supported by evidence or any sense of reality.
5.11.10 5.11.11	Applicant's assessment of the cumulative (inter-project) impacts of the proposed development with other infrastructure projects	The Applicant's dismissal of inter-project cumulative effects based on the assumption that each would embody mitigation that removed all negative impacts is disingenuous. In particular, the proposed replacement National Grid in Fields SA52-3 and SA57-9 would have a major negative impact on the setting of East Claydon and its multiple heritage assets. To suggest that the adverse effects on the landscape, noise, habitats, flood risk and other factors of a development of this scale with its attendant pylons could be completely removed through 'mitigation' is completely unrealistic. Where inter-project effects have been assessed, the Applicant incorrectly concludes that multiple examples of 'Minor adverse residual impact' are not cumulative but equate to a nett Not Significant impact. It is not clear how the Applicant arrives at such a conclusion since it fails to pass a simple sense check. A particular concern is the cumulative, mass industrialisation of the area within the Order Limits comprising Parcel 3 and adjacent land where, in the event that all projects were to proceed (i.e. Rosefield solar, substation and collector compound; National Grid replacement substation; Statera, East Claydon BESS; Statkraft BESS; Tuckey Farm solar), the cumulative, negative impacts on landscape, visual, noise, ecological, residential amenity and other aspects would be enormous. The Applicant has failed to address this point.
5.11.12	Concern that the Applicant has a lack of appreciation for the clay soils characteristic of the area and the sensitivity of the soils to the Proposed Development and other projects in the area. (Reference report to the Welsh Government on the impacts of solar installations on soils).	The Applicant states that the specialist team responsible for drafting the report to the Welsh Government has advised them in relation to the current development proposal and suggests that the clay soils within the Order Limits are of 'medium sensitivity' given the 'drier' prevailing local climate. That view is called into question by the observation that, at the time of writing (June 2026), there is extensive flooding in the area as a result of heavy rainfall. Local farmers have learned when it is safe to work the land and there are extensive periods, especially over the late autumn-early spring where use of tractors and other machinery is avoided specifically to prevent damage to the soil. How does the Applicant plan to manage construction work, as well as maintenance during the operational phase, in order to prevent such damage?

5.11.13 Concern that the Applicant does not control the movement of non-HGV construction traffic (notably staff travel) and further comment noting that there would be cumulative traffic impacts on the limited road network.	The Applicant reverts to referencing the Outline CTMP [REP2-065] and the Draft DCO (Requirement 13) but neither makes specific reference to controls over non-HGV traffic. We can find no commitment that non-HGV traffic associated with the proposed development would be required to use the prescribed construction traffic route. Indeed, Para. 2.3.1 of REP2-065 clearly refers only to HGV traffic not being allowed to travel through local villages. Given experience with traffic associated with other major infrastructure projects (e.g. HS2, EWR) travelling through the villages, we remain sceptical that the Applicant would exert controls over non-HGV traffic.
5.11.14 Need for the BESS element of the proposed development.	The Applicant dismisses the suggestion of collaboration with the Statera East Claydon BESS (approved on appeal) but we welcome the Examiners' further question at ExQ2 Q2.2.4 that interrogates this point further.
5.11.15 Impact of noise from the development.	The Applicant submits that the impact of noise from the proposed development would be very low and asserts that exposure of users of PRowS to noise-generating infrastructure would be transitory. The assessment avoids some key points: • Background levels of noise across the area defined by the Order Limits are extremely low and so any additional noise is easily perceived, especially where frequency ranges are distinct from background. • Noise is perceived over long distances across the area. • A key attraction of the PRow network is the opportunity to experience the countryside, its wildlife and birdsong, and to see farm livestock and crops. The Applicant's reference to 'transitory' exposure to noise seems more appropriate to passing in a vehicle rather than strolling on foot, whereby an individual may undergo multiple exposures to noise level which, in combination with the visual impact of an industrialised landscape, leads to an unfavourable overall experience. • Noise disturbance to residential and non-residential receptors during construction will be experienced across the area. • The Applicant has not addressed our concerns over the proposed working hours of 07:00-19:00, with one hour, 'book-end' periods for travel during the construction phase, which are wholly unacceptable to local residents. (See also 5.11.22).
5.11.16 Clarification sought from the Applicant as to what surveys have been undertaken in Fields SA51-53 in	The Applicant states that it <i>"has undertaken several baseline surveys to establish the impacts and to inform a robust assessment of the likely impacts of the cable route to the National Grid Substation through fields SA51 – 53."</i> We have been unable to

order to establish the impact of the cable route to the National Grid substation.	locate details of those surveys and would be grateful if the Applicant could direct us to the relevant documents.														
5.11.17 Soil stripping and impact on soil ecosystems.	The Applicant asserts that large scale soil stripping is not proposed as part of the construction process. Reference to Para. 5.3.1 of REP2-069 states that “... <i>prior to construction of a hard surface, topsoil will be stripped and that which cannot be reused/reinstated will be stored within bunds on Site for the duration of the lifetime of the Proposed Development. It is anticipated that this would be done during each phase of the construction works and not be undertaken all at once.</i>” It is not clear how ‘hard surface’ is defined here. Reference to the current version of the Outline Drainage Strategy [REP3-040] provides the following estimates for impermeable surfaces: <table data-bbox="1075 526 1747 798"> <tr> <td>Parcel 1*:</td><td>6.00 ha (Para. 5.2.1)</td></tr> <tr> <td>Access tracks*:</td><td>3.67 ha (Para. 5.5.1)</td></tr> <tr> <td>Satellite Collector Compound:</td><td>0.25 Ha (Para. 5.7.1)</td></tr> <tr> <td>BESS:</td><td>5.70 Ha (Para. 6.1.5)</td></tr> <tr> <td>Main Collector Compound:</td><td>1.25 Ha (Para. 7.2.2)</td></tr> <tr> <td>Substation:</td><td>2.10 Ha (Para. 7.3.2)</td></tr> <tr> <td>Total</td><td>18.97 Ha</td></tr> </table> * NB It is not clear whether the figure for access tracks applies only to Parcel 1. + Page 90 of REP3-040 quotes a figure of 11.3 Ha for Parcel 1. There appear to be no estimates for areas designated as construction compounds. Assuming that ‘impermeable area’ equates to an area where topsoil is to be stripped, this means that the total area subject to soil stripping would be significantly in excess of 20 Ha. Some of this would involve stripping of both topsoil and subsoil. This is not a trivial amount.	Parcel 1*:	6.00 ha (Para. 5.2.1)	Access tracks*:	3.67 ha (Para. 5.5.1)	Satellite Collector Compound:	0.25 Ha (Para. 5.7.1)	BESS:	5.70 Ha (Para. 6.1.5)	Main Collector Compound:	1.25 Ha (Para. 7.2.2)	Substation:	2.10 Ha (Para. 7.3.2)	Total	18.97 Ha
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5.11.18 Adherence of construction vehicle traffic to speed limits. Safety of non-motorised road users. Access to the site from Calvert Road.	The Applicant refers to GPS tracking as a means of enforcing speed limits. However, it is not demonstrated whether the system would be monitored or whether the information would be used only where there is a complaint. We note that there would be no controls over non-HGV contractor vehicles. The Applicant continues to dismiss our concerns over the safety of non-motorised road users, having made no estimates of the numbers involved, especially the large numbers of cyclists. We welcome the commitment that there will be no access to the site from Calvert Road via Three Points Lane.														

5.11.19 Reliance on modelling for assessment of flood risk and lack of consideration of the overtopping of Claydon Brook. Impact of soil stripping on flood risk. Need for assessment of cumulative flood risk with other infrastructure projects.	The Applicant simply refers to ES Vol. 4 Appendix 16.1 and asserts that flood risk has been robustly assessed, stating that the site layout has been “...<i>designed to avoid areas of greatest risk wherever practicable</i> [our emphasis].” We remain sceptical that the Applicant has recognised the true extent of flood risk across the site but especially in the Parcel 3 and surrounding area. The Applicant repeats the statement that “<i>There will be very minimal soil stripping for the Proposed Development</i>”, but note our comments under 5.11.18. It should be noted that a large part of the areas to be stripped lie in Parcel 3 which is particularly prone to flooding.
5.11.20 Importance of natural space, connectivity of blue and green spaces and biodiversity to human health is not recognised by the Applicant. Sensitivity to, and impact on health of changes on the outdoor environment and its amenity value.	The Applicant simply asserts that they do “<i>recognise the importance of access and experience of the natural environment to residents, and notes that this applies more acutely to those residents who live in the local area, are more likely to use local PRow/experience the local environment more readily and regularly. It is also recognised that access to physical recreation and enjoyment of the natural environment and its amenity are direct drivers / determinants of health and wellbeing – both in terms of mental and physical health and wellbeing.</i>” They go on to say that any effects would be mitigated through engagement, consultation, management plans and a Community Liaison Group. We regret to say that such statements only serve to highlight the lack of appreciation by the Applicant of the extent and significance of the transformation their proposals would create. We remain firmly of the view that the extensive changes to the landscape, habitats, loss of tranquillity and other impacts of the industrialisation of the countryside, brought about by the proposed project, remove the single most important amenity available to local residents with consequent negative effects on their health and well-being. Mitigation is not achieved through ‘engagement, consultation, management plans and a Community Liaison Group.’
5.11.21 View that all of the population (rather than sub-populations) should be considered vulnerable and sensitive receptors because of the dependence of local communities on access to the countryside as a key aspect of their health and wellbeing.	The Applicant asserts that analysis has been undertaken at a population level but then suggests that some sub-populations may be more sensitive to change. Whilst this may be correct for some aspects of the proposed scheme, it leads to some situations where the Applicant is unable to identify sub-populations and so the matter is set aside Para. 5.8.1 of CR1-022 (Annex A) states that, “<i>As such it is challenging to predict with any certainty the degree to which nuisance and annoyance from noise will affect people at an individual level.</i>” The Applicant recognises at Para. 7.2.10 of CR1-022 that some residential receptors may experience noise levels that “<i>translate into significant adverse effects on health</i>

	and well-being” but they go on to describe a series of measures that may [our emphasis] be employed that carry caveats such as ‘where practicable’. At Para. 7.2.12 they go on to say, “<i>It is recognised that noise is a fundamental concern of the local community that may contribute to a real or perceived effect on residential amenity or the enjoyment of the outdoor environment, which may cause stress and anxiety, reducing mental health and wellbeing for some individuals and sub-populations,</i>” but revert to the concept of management plans and commitment to the provision of information, engagement and liaison with communities and the means of mitigating the effects. (See also 5.11.23).
5.11.22	Concern over proposed working hours during construction. The Applicant reiterates that “<i>Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays.</i>” As noted under 5.11.15, the Applicant has not addressed our concerns over the proposed working hours of 07:00-19:00, with one hour, ‘book-end’ periods for travel during the construction phase that would extend the on-site and local road network activities to 06:00-20:00. This is wholly unacceptable to local residents. We submit that this is not the approach of a Considerate Constructor.
5.11.23	Noise impacts: Importance of tranquillity in the local environment. Intrusive nature of noise emissions during operation. Intrusive nature of noise during construction. Negative impacts of noise are not limited to sub-populations Local communities have experienced noise disturbance from the HS2 and EWR projects over a number of years which has abated only recently. This disturbance was significant event though, for the most part, the associated construction works occurred at a considerable distance from residential areas. It is disingenuous of the Applicant to suggest at Para. 7.2.29 of CR1-022 that, “<i>Based on these considerations, in consideration of the prevailing health indicators and the approach to embedded and additional mitigation, the significance of the effect of noise as a determinant on physical and mental health and wellbeing is considered to be</i> [our emphasis]: • <i>Minor adverse and not significant during the construction and decommissioning phases; and</i> • <i>Minor adverse and not significant during the operational (including maintenance) phase.”</i> Indeed, this contradicts statements at Para. 7.4.22 which include: Significant effects (moderate or moderate/major adverse) for six groups of PRow during construction and decommissioning [some of the most important and frequently used PRow in the area] and, at Para, 7.4.23, “negligible or minor/minor to moderate adverse for eight PRow”, which the Applicant suggests are considered [our emphasis] to be Non-significant.

	The Applicant presents a contradictory analysis as regards the impact of noise emitted from the BESS element of the proposed development. In their comments at Para. 3.2.4 of REP3-052, they cite noise impacts on Sion Hill Farm, livestock and cumulative effects with the National Grid substation and Statera BESS as factors in deciding to locate the BESS element in Fields D8-9 rather than Fields E10-11. In acknowledging the significant adverse effects of noise emissions from the BESS, the logical conclusion is that it would have the same effects on receptors in the area around Fields D8-9. We refer also to points 5.11.5 and 5.11.21.
5.11.24 Visual Amenity (PRoWs). Comment that 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.	The Applicant <i>"does not consider that residual significant adverse effects on viewpoints on 6 groups of PRoWs (representing 30 PRoW) across 96 PRoWs within the Community Study Area can be translated to a wider significant adverse effect on the network as a whole."</i> We disagree on several levels. The Applicant considers that significant adverse effects are restricted to six PRoWs, but this is a purely subjective view and characteristic of the 'silo' approach to assessing impacts of the development. They are keen to suggest also that the negative impacts of the proposed development, be it visual, noise, limitation of views, etc., are experienced in a transitory manner. As we have pointed out consistently, the network is experienced not as a series of individual viewpoints or momentary exposure to intrusive noise or, indeed, the absence of sounds such as birdsong. Rather, it is experienced in a dynamic sense as part of a continuum. Were the proposed development to proceed, users of PRoWs would be subject to multiple exposures to an industrialised landscape with a consequent, cumulative, negative impact. In dismissing Appeal (Ref: APP/E3335/W/25/3374756; Dunsham Lane, Wayford, Crewkerne, Somerset, TA18 8QN) the Inspector noted at Para. 18, <i>"As agreed by all parties at the Inquiry one's perception is a kinetic experience along a route rather than a specific viewing point."</i> We submit that the Applicant should reassess the impacts of their proposed development on the PRoW and local road networks in line with the position adopted in determining that Appeal.
5.11.25 Visual Amenity (Residential) Comment that 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	The Applicant acknowledges that, <i>"While a small number of residential receptors would experience significant adverse effects,"</i> but goes on to say, <i>"the assessment concludes that the Proposed Development would not have an overbearing effect [our emphasis] on the visual amenity experienced by residents of properties around the Proposed</i>

	from a property is transformed into an industrial site. Further comment that the effect on visual amenity at all stages would be “Moderate Adverse and potentially Significant” underestimates the true impact.	<i>Development.</i> ” ‘Overbearing’ is a very high bar, especially given the nature of the settlements and their setting as conservation areas. We submit that the Applicant continues to underestimate the impacts of the proposed development on visual amenity.
5.11.26	Traffic Transport and Access (Enhancement) The Applicant’s assertion that provision of new permissive paths would result in the enhancement of health and well-being.	The Applicant asserts that their wider assessment, “ <i>makes it clear that this conclusion [an objective improvement] relating to community access is notwithstanding the residual significant adverse effects relating to visual amenity on existing PRow.</i> ” We firmly reject this. The loss of amenity across the PRow network cannot be offset against perceived benefits of minor, additional footpaths.
5.11.27	Traffic, Transport and Access (Scope) Inadequate assessment of impact on fear and intimidation and damage to highways.	We have referred at 5.11.8 to the Applicant’s lack of appreciation of the numbers of non-motorised road users on the local road network and the dismissal of the likely effects of construction traffic on them. The Applicant’s provisions at Para. 4.11 in REP2-065 are to monitor construction vehicle speeds and to ‘train’ staff how to respond to equestrians they encounter on local roads. We have witnessed too many examples of incidences with construction traffic (HGV and non-HGV) associated with previous and existing infrastructure projects to accept that this is a realistic and effective approach to managing a critical safety issue.
5.11.28	Socio-economics Impact of the proposed development on tenant farmers, including their health and well-being and the viability of their businesses.	The Applicant states they are “...content that, through detailed engagement, negotiation and amendment to the Proposed Development, all affected parties have been provided with information, support, access to mitigation, and financial and/or land-based compensation such that the viability of operations is not affected.” This is contrary to the reality that one tenant farmer has been obliged to ‘surrender’ their landholding and that the tenants of Knowl Hill Farm and Preston Farms have indicated that the proposed arrangements through land swaps and other aspects of the proposed arrangements do not meet their needs (see REP2-123 & REP2-107 respectively). This is difficult to reconcile with the Applicant’s statement of contentment.
5.11.29	Major Accidents and Disasters Adequacy of the Plume Study and assumptions on wind direction.	As at 14 th June 2026, according to the Met Office (Winslow (Buckinghamshire) weather - Met Office) the projected wind direction for the next 7 days in Winslow is: • North-west veering to east-northeast; • East-northeast veering to southeast; • West to southwest; • Southwest; • Southwest;

	• Southwest; • Southwest. Thus, just a small snapshot demonstrates that, whilst the prevailing wind may be southwesterly, there are frequent changes of direction which means that receptors other than those selected by the Applicant should be considered within the Plume Study.
5.11.30 National Health Implications Impacts on Preston Farms and TCS/Biosciences	The Applicant asserts that amendments to the design “ <i>have resulted in the assessment within the ES concluding non-significant residual effects on Preston Farms Ltd and TCS Biosciences Ltd. Therefore, the Applicant does not consider that the Proposed Development gives rise to/or places any unacceptable risk to, or unacceptable interference with, human health and public safety.</i>” This position is not supported by verbal submissions made by several contributors at ISH1 or in written statements made by Preston Farms/TCS Biosciences (REP3-067). It is our view that the Applicant has consistently underestimated the potential for impact on these businesses, has failed to adopt an appropriate precautionary approach and, in doing so has miscalculated the implications for the health services.
5.11.31 Cumulative impacts with other infrastructure projects. Application of false logic results in underestimation of cumulative impacts.	The Applicant states that they have “<i>provided a detailed cumulative assessment of effects on visual amenity together with the replacement National Grid East Claydon Substation</i>” in REP1-044. Table 17.8 of that document refers to a range of potential interactions as follows: • Bats – loss of foraging habitat. Tributaries of the Claydon Brook that lie within and adjacent to Parcel 3 provide an important foraging and commuting route for bats. This has been noted for the Statera East Claydon BESS project and the Statkraft BESS project. The Applicant has undertaken only limited ecology studies in this area but, together with its proposed substation and solar installation and associated loss of grazing, there is a high chance of cumulative impact with the proposed National Grid substation and other infrastructure projects. • Ground nesting birds. Ground nesting birds, including skylarks, are known to be present in Fields SA51-53 and SA57-59 (the proposed site of the replacement National Grid substation and cabling route for the present proposal). Although these fields are within the Order Limits, no surveys have been undertaken by the Applicant. As a result, they have no basis on which to judge cumulative impacts such as displacement of skylark territories which are already recognised as being under threat from other infrastructure projects (see Table 17.11 of REP1-044).

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- Cultural heritage. A request was made at ISH1 for the applicant to obtain results from the National Grid's archaeological trial trenching investigation so that a more holistic view of the hidden heritage assets could be determined and, hence, a measure of the cumulative impacts thereon.
 - Designated heritage assets. Although the scale of the replacement National Grid substation is yet to be confirmed the choice of location for the development would have a major impact on the setting of the designated heritage assets in East Claydon, notably the Grade II* Listed, St Mary's Church, the Grade II Listed, White House and the important medieval earthworks. The addition of the Applicant's proposed substation and that for the East Claydon BESS would have a substantial combined negative impact, not only on the heritage assets of East Claydon but also those for Granborough. The Applicant's assessment that the cumulative effect would be **minor** and **not significant** is not supportable.
 - Groundwater. Given the close proximity of the Statera East Claydon BESS and site designated for the National Grid replacement substation, the risk of contamination from three adjacent construction sites must be greater than for one of the projects in isolation.
 - Soil resilience. We have expressed concerns as to the impact of the proposed development in isolation from compaction, soil stripping and increased flood risk. Those effects and associated risks would be amplified when considered in combination with the National Grid and Statera BESS projects.
 - Neighbouring residents. The Applicant concludes that noise from the National Grid replacement substation and their own development would not have a cumulative impact on Sion Hill Farm. This, despite their conclusion that siting their BESS in Parcel 3 would impose an unacceptable level of noise on Sion Hill Farm.
 - Effects on agricultural economy. Construction of the National Grid Substation would remove yet more land from agricultural production and would create even further burden on the management of Preston Farms' business.
 - Community access. Construction of the replacement National Grid substation would involve the loss of PRowS ECL/3/1, ECL/3A/1 and ECL/3/2. The cumulative impact with the proposed development and Statera BESS would effectively remove all amenity value from the footpath network to the East of East Claydon and west of Granborough.
 - Traffic and transport. The Applicant dismisses the potential for inter-project effects on transport as it assumes the National Grid construction traffic would adopt a different route. However, this ignores the fact that this is likely to be
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	the same route adopted for the Statera BESS and Statkraft BESS, were these to proceed. Further, it fails to recognise that increased traffic on one part of the network has consequential changes on other parts of the network. Were the Applicant's development to be undertaken at the same time as the National Grid and Statera projects, the entire local network would be subject to large increases in traffic overall and HGVs in particular. • Flood risk. We remain deeply concerned that the various infrastructure projects have failed to survey and, hence, understand the challenges presented by the fragility of the local watercourses (the frequency with which they overtop) and the nature of the soil. Notwithstanding the proposed inclusion of attenuation ponds and controlled discharge rates, the fundamental issues remain and can only be exacerbated by the large increase in impermeable surfaces and loss of agricultural drainage systems.
5.11.32 Lack of understanding of, or interest in the farming community and the impact on their businesses, health and well-being.	The Applicant states that they recognise the sensitivity of the farming community and have considered that agricultural workers and tenants are highly sensitive to change that may result in health implications. However, they reiterate that they are 'content' that through detailed engagement, negotiation and amendment to the Proposed Development, all affected parties have been provided with information, support, access to mitigation, and financial and/or land-based compensation such that the viability of operations is not affected. We maintain our position on this point. Indeed, at ISH1 (EV7-013; 00:40:00:13 - 00:40:33:26), the applicant made clear that landholdings are considered purely as a commodity as follows: <i>"That is what the Claydon estate has provided the tenant. Um, that the conclusions are as set out in the environmental statement. And my point regarding the landholding is, was just quite simple, that it is just rolling on an annual tenancy. Um, that's a legal point. It's a rolling on annual tenancy that could be brought to an end by a notice to quit now. And I don't deny there's probably a very good relationship with the estate, but doesn't stop that position being the fact. Uh, and a landlord can do what they want, um, under that tenancy"</i>. The tenant farmers, agriculture in general and TCS Biosciences as a key local employer are central to our local communities and we share critical interdependencies with them. We submit that their roles and position within those communities warrant greater attention and understanding than has been shown to date.

We confirm that AI was not employed in drafting this document.

East Claydon Parish Council, June 2026