

**Planning Act 2008 – section 55**

**Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield**

**Solar Farm (EN010158)**

**RESPONSE TO EXAMINING AUTHORITY QUESTIONS DEADLINE 4**

**on behalf of the**

**Claydons Solar Action Group (CSAG)**

## Claydons Solar Action Group

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- 1) Responses to ExA's questions
- 2) Comments on overplanting
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- 4) Site visit requests

### Artificial Intelligence (AI)

The only use of AI was by Professor Dobson under Item 3. AI was used for cross checking in searches and results verified.

SECTION 1	QUESTION	RESPONSE TO EXAMINING AUTHORITY'S QUESTIONS TO CSAG
Q.2.23	<p><b>Location of the BESS</b></p> <p>To all parties: Please provide comments on the applicant's response to action point 7 from ISH1 [REP3-052] that sets out its position on why fields E10 and E11 are an unsuitable location for the BESS. Has the applicant provided sufficient justification for not proposing the BESS in fields E10 and E11? If not, what further information should the applicant provide?</p>	<p>At Para. 3.1.1 of REP3-052, the Applicant gives the following reasons for the decision not to locate the BESS in Fields E10-11:</p> <ul style="list-style-type: none"><li>• E11 – Proximity to Sion Hill Farm and associated noise and visual impacts. – Offset requirements from overhead lines and pylons transecting the Field. – Presence of higher flood risk areas.</li><li>• E10 – Presence of higher flood risk areas. – Offset requirements from overhead lines and pylons transecting the Field.</li></ul>

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		<p>Given these constraints, the Applicant has not explained why these fields (plus E20) are suitable for their proposed substation and main collector compound.</p> <p>At Para. 3.2.4, the applicant cites noise impacts on Sion Hill Farm, livestock and cumulative effects with the NG substation and Statera BESS as further reasons for not locating the BESS in E10-11.</p> <p>It is not explained why noise and cumulative impacts are a concern if the BESS is located in these fields, but are not a similar constraint for the locating of the substation.</p> <p>Para. 4.1.3 describes how the required offsets from pylons and overhead lines place constraints on the available space for development (see also Fig. 3). The result is inefficient use of the land.</p> <p>Notwithstanding the comments above, CSAG does not consider Fields E10, E11 and E20 are suitable locations for the BESS or the substation due to likely multiple adverse impacts, including noise, vibration, landscape and visual, amenity and on public rights of way.</p>
Q.2.5.22	<p><b>BNG</b> The applicant has summarised its understanding of the discussion The applicant has summarised its understanding of the discussion at ISH1 (under item 3) on the methodology used in the biodiversity net gain metric and its accuracy in <a href="#">[REP3-049]</a>. The applicant has also referenced its response to CSAG’s deadline 2 submission <a href="#">[REP3-051]</a> which in table 5 (ref. 5.9.3) provides further information on its own position.</p>	<p><b>1. <u>CSAG Response to Applicant’s comments in <a href="#">REP3-049</a>:</u></b></p> <p>1.1 (REP3-049) (p38-39) records that Mr Lang for the Applicant “<i>noted that the BNG assessment is currently an interim position based on the application-level design, however, there is a commitment to update that assessment at the detailed design stage, once the full layout has been finalised</i>”.</p>

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	<p>Are there any further points you wish to make on this issue?  at ISH1 (under item 3) on the methodology used in the biodiversity net gain metric and its accuracy in <a href="#">[REP3-049]</a>. The applicant has also referenced its response to CSAG’s deadline 2 submission <a href="#">[REP3-051]</a> which in table 5 (ref. 5.9.3) provides further information on its own position. Are there any further points you wish to make on this issue?</p>	<p>1.2 CSAG consider that it is important that the BNG assessment is as accurate as possible in order that the ExA can be confident not only in 10% net gain being achievable in line with impending statutory requirements (noting that this target is not mandatory for NSIPs at the time of writing), but also that the Applicant’s stated Requirement 7 commitment to 40% net gain in area-based units is realistic and/or to be given any weight in the planning balance. The ExA should also be provided with sufficiently robust information to afford an understanding of whether achievement of either target will require off-site provision and (if so) the likelihood of that provision being met locally.</p> <p>1.3 REP3-049 (p38-39) records that Ms Stirling, on behalf of the Applicant, <i>“confirmed that [measuring hedgerows from the centreline] was an issue requiring further discussion between the parties. She emphasised that the Applicant is not seeking to avoid responsibility for providing buffers, but that the key issue is how those buffers are secured in a way that is clear, precise and enforceable through the DCO framework”</i> going on to suggest that <i>“mitigation measures such as buffers must ultimately be secured through enforceable requirements...”</i> and <i>“...for such controls to be effective, they must be based on parameters that are sufficiently</i></p>
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		<p><i>certain and capable of consistent measurement over time.”</i></p> <p>1.4 CSAG consider that this is a contrived justification for using the centreline of hedgerows as the starting point for measuring buffers that wholly overlooks why such buffers are important and what their purpose is. It would be straightforward to measure the extant outer canopy line of existing hedgerow vegetation at a fixed and agreed point in time, using satellite imagery, and to mark out and/or plan around a set buffer distance from that line using GPS. CSAG wholly rejects the Applicant’s submissions on this matter, but also notes and welcomes Ms Stirling’s statement that the Applicant is prepared to consider the more ecologically rational alternative and its commitment to exploring “<i>a workable approach based on the baseline condition</i>” and “<i>scope for a practical solution between the parties, including potentially site-specific adjustments or bespoke buffer arrangements in key locations where ecological sensitivity is greatest</i>”.</p> <p>1.5 REP3-049 (p50-52) records Buckinghamshire Council’s concerns with the accuracy and adequacy of the BNG assessment and calculations. CSAG agrees with Buckinghamshire’s position on these points.</p>
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		<p>1.6 <b>REP3-049</b> (p50-52) also records the Applicant's oral responses to Bucks' concerns, including Mr Lang's attempts to justify departure from the Metric rules and indeed from UKHab classifications and related Metric inputs.</p> <p>1.7 Again, CSAG rejects the Applicant's explanations for these errors and anomalies. The decision to classify all arable margins (where mapped at all) as grassland neglects to allow for the possibility that some such margins will qualify as Priority arable field margin habitat. As regards the claimed 'anomalies' that mean "<i>the metric does not operate well for large-scale NSIP schemes</i>" the examples given apply to schemes at any level and disregarding the trading and other rules is no more justified for an NSIP than any other project.</p> <p>1.8 <b>REP3-049</b> (p52-53) records the Applicant's oral responses to Mr Woodfield's and CSAG's concerns, including further attempts by Mr Lang to justify departure from the Metric rules and indeed from UKHab classifications and related Metric inputs.</p> <p>1.9 Mr Lang's assertions that arable field margins were not mapped due to falling below the 'Minimum Mapping Unit' of the UKHab system (i.e. 25m<sup>2</sup> or 5m length) are</p>
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		<p>demonstrably wrong on the facts, as already demonstrated by CSAG's/ Mr Woodfield's written submissions in <a href="#">REP2-102</a>. The same applies to other omitted habitats, noting that each omission incrementally suppresses the baseline value and score of the land and unjustifiably inflates the post-development score and value. The suggestion that "<i>habitat associated with hedgerows, including margins up to 2m wide, is captured within the hedgerow condition assessment, rather than separately as an area-based habitat</i>" is also rejected (Mr Woodfield will demonstrate how this further suppresses overall baseline values if required). CSAG also maintains its position that the applicant's effort to survey arable weeds is evidenced as inadequate by the extreme paucity of species found.</p> <p>1.10 In his oral submissions at ISH2, Mr Lang inadvertently exposed a further example of disregard of Metric rules in his answer to why certain habitat parcels [e.g. Parcel 435] had been misclassified by the Applicant. REP3-049 (p52-53) records that "<i>In relation to specific parcels identified by the Action Group, Mr Lang explained that these were classified as arable at the time of survey because survey notes indicate that they had been sprayed with herbicide and were in transition from arable to grassland [sic]. Therefore, arable rather than</i></p>
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		<p><i>grassland was the correct classification.</i>” The example given here is one where the Metric ‘degradation rules’ should have been applied – i.e. where there is evidence of recent interventions that have created (or are in the process of creating) a lower value habitat, the higher pre-existing habitat should be used as a baseline. The Applicant’s failure to apply these rules, both in this parcel and others where grassland has been classified and scored as arable, is a further measure of error and unreliability in its BNG assessment and calculation. (see also para 2.7 below)</p> <p>1.11 CSAG notes that “<i>Ms Stirling, on behalf of the Applicant, responded first on BNG. She stated that the Applicant had noted the concerns raised and would respond fully in writing with a note at Deadline 4.</i>”.</p> <p>1.12 Depending on the extent to which this anticipated note and any associated amendment to the BNG assessment and calculation remedies the errors of concern, CSAG may wish to respond further after Deadline 4. CSAG notes the “post-hearing note” in REP3-049 which states that “<i>With respect to providing a more detailed response on BNG, the Applicant refers to question 5.9.3 in the</i></p>
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		<p><i>Applicant's Response to Deadline 2 Submissions [EN010158/APP/8.17] which is submitted at Deadline 3.</i></p> <p><b><u>2</u></b> <b><u>CSAG Response to Applicant's comments in REP3-051:</u></b></p> <p>2.1 The Applicant's responses to CSAG's deadline 2 submissions on BNG (as set out at <a href="#">REP2-102</a>) are set out in REP3-051, Table 5 (ref. 5.9.3) (pps 62-63). These are grouped under a number of <b>bold</b> headings in that table, which are replicated below with firstly a copy of the Applicant's response in italics and then CSAG's further response.</p> <p><b>Cropland edge habitat not being mapped</b></p> <p>2.2 Applicant: <i>"We note the assertion from the CSAG, but the Applicant does not believe it has substantially underestimated the extent of existing arable margins, and does not envisage that there will be any significant change to the level of biodiversity gain indicated in ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]. It is important to note that in any event the majority of these arable margins are retained in situ being incorporated into the buffers between woodlands, hedgerows and the</i></p>
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		<p>solar PV panels. The Applicant will provide a detailed response at Deadline 4 justifying our position regards arable margins and if the Applicant considers it be required provide an updated BNG metric.”</p> <p>2.3 CSAG: On the specific rebuttal points, CSAG repeats the comments made at paras 1.7-1.9 above in rejecting these justifications and refers back to the examples in <a href="#">REP2-102</a>. CSAG does not accept the Applicant’s suggestion that its underestimation of arable field margin habitats is insubstantial. CSAG notes that the Applicant subsequently committed to a revised BNG Metric at Deadline 4 and this is awaited.</p> <p><b>Trading rules</b></p> <p>2.4 Applicant: <i>“It has also been noted by both the CSAG and Buckinghamshire Council that there is a specific technical paradox regarding Biodiversity Net Gain (BNG) trading rules when dealing with arable field margins and replacement of individual trees being lost from hedgerows. The Applicant understands the reason why these breaches of trading rules have been highlighted and will provide a justification at Deadline 4 that the trading errors highlighted are actually a paradox arising from the working of metric and do not reflect the real life</i></p>
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		<p><i>situation and why the Applicant believes strict adherence to the trading rules is not the most appropriate and transparent way to proceed in these two instances”.</i></p> <p>2.5 CSAG: the justification for departure from Metric rules is not accepted. See paragraph 1.7 above for CSAG’s comment on the ‘exceptionalism’ being sought for NSIP schemes.</p> <p><b>Parcel 425</b></p> <p>2.6 <i>“Parcel 425 within the habitat base mapping was identified as cropland in the UKHab survey. The field notes state that it had been recently sprayed with herbicide (part of the conversion to arable) therefore the Applicant asserts that identification as cropland is the correct habitat type”.</i></p> <p>2.7 CSAG: see paragraph 1.11 above and refer back to the illustration of error as articulated in <a href="#">REP2-102</a>. This is a clear example of impermissible classification in direct contradiction of the Biodiversity Metric degradation rules. All such habitats, whether recently ploughed or herbicided, should have been classified as their pre-intervention habitat and condition – here being grassland.</p>
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		<p><b>Degradation rules</b></p> <p>2.8 Applicant: <i>“The Applicant wholly disagrees and rejects the accusation that it has conducted any degradation activities. Currently the Applicant has no control over land management activities on-site. Baseline UKHab surveys were conducted between 2023 and 2025. There is no evidence of deliberate habitat degradation being carried out. Any changes in habitat type between 2020 and our surveys appear to be the result of normal farming operations. Any specific areas of concern can be reviewed in the next iteration of the BNG calculation”.</i></p> <p>2.9 CSAG: please see paras 2.6 and 2.7 above for a clear example of where the degradation rules should have been applied. The Applicant’s protestations are academic – the relevant factor is whether the habitat value has evidently been suppressed by recent interventions or not. In cases of doubt, the correct approach is to record the higher value pre-degradation baseline rather than deliberate on who is to blame and/or whether the recent degradation was intentional.</p> <p><b>Buffering of field boundaries</b></p>
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		<p>2.10 Applicant “<i>the design for the Proposed Development includes buffers and stand-off distances from hedgerows and woodlands. The habitats proposed in these buffer zones is a mosaic of scrub, grassland and wild bird seed mix intended to benefit wildlife. The removal of crop from the fields will ultimately benefit wildlife and provide an enhanced buffer between solar and the hedgerows/woodlands on the periphery of fields. These buffers are in many places substantially larger than the existing field margins, e.g. within Fields B8, B9, B10, D28, D29.</i>”</p> <p>2.11 CSAG: The Applicant’s answer above is merely reiteration of the claims that are challenged by CSAG’s Deadline 2 submissions (<a href="#">REP2-102</a> pdf p19), not an answer to those challenges. CSAG said “<i>The applicant’s quantified claims about enhanced buffering of field boundaries and woodland (and by extension the ameliorative effect of this in terms of potential impacts on bats and other species) must equally be considered with caution in the absence of such corrections to the base habitat mapping being made.</i>” The Applicant appears to be responding by saying that buffers will still exist even after such corrections, which may well be the case, but is not the point. The ExA needs to understand the effect of</p>
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		such corrections to put the Applicant's quantitative and overall claims into context
Q2.12.6	<p><b>Non-visual effects</b> Elaborate on concerns raised in your written representation and at ISH1 that screen planting would reduce levels of adverse landscape and visual effects as much as the landscape and visual impact assessment assumes, partly "because screening cannot mitigate non-visual experiential landscape and visual effects for example sound, smell, awareness, security / safety, memories, associations...". In doing so, please comment on the suitability of the applicant's response to your written representation on this matter [REP2-086] at reference 7.1.18 that considers noise and odour.</p>	<p>1) Q2.12.6 asks CSAG to '<i>elaborate on concerns raised in your written representation and at ISH1 that screen planting would reduce levels of adverse landscape and visual effects as much as the landscape and visual impact assessment assumes</i>'.</p> <p>2) Regarding effects on landscape character, the reason for the concern is due to the Applicant's LVIA having assumed that screening can mitigate <b>all</b> non-visual 'experiential' effects on character, which is not the case. Planting is not effective in reducing levels of non-visual adverse effects such as noise and odour. These and other non-visual effects can alter people's experiences and perceptions of a landscape, regardless of whether or not the development / change causing the effect is visible.</p> <p>3) Indeed, arguably, 'sight' may be <b>less</b> important than 'character'. As shown on <i>Figure 1: What is Landscape?</i> (from Natural England's 2016 publication <i>An Approach to Landscape Character Assessment</i>, reproduced on page 5 of CSAG's LVR), 'sight' only occupies a small proportion of the wheel.</p> <p>4) Q2.12.6 also asks CSAG to '<i>comment on the suitability of the applicant's response to your written representation on</i></p>

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		<p><i>this matter [REP2-086] at reference 7.1.18 that considers noise and odour’.</i></p> <p>5) In CSAG’s landscape expert’s opinion, the Applicant’s response is not suitable. That is because it assumes that non-visual effects only arise from a) noise; b) odour; and c) <i>‘the additional movement of vehicles within the landscape’</i> (although the latter is either visual, or is generating noise). It does not consider the other tangible / quantifiable factors that should be included, such as vibration; dust; drainage / flooding; and pollution.</p> <p>6) Nor does it consider intangible / subjective factors, including those shown on <i>Figure 1: What is Landscape?</i> such as memories, associations, and preferences. Also, tranquillity; sense of security / safety; disruption; and / or awareness of what is going on. In addition, for some people, landscapes are sources of inspiration, or places to reflect, or heal.</p> <p>7) However, it is important to note that the LVIA does <b>not</b> assume that the proposed screen planting would reduce levels of adverse effects on landscape character – it predicts that levels of adverse landscape effects would remain the same for the duration of the operation.</p> <p>8) Regarding visual effects, in summary, the reason why CSAG’s landscape expert considers that the proposed screen planting would not reduce levels of adverse effects on views as much as the Applicant’s LVIA predicts is mainly</p>
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		<p>that the LVIA assumes the proposed screening vegetation would a) establish successfully and become an effective screen within 10 years (including proposed woodland); and b) remain in place for the duration of the operation, both of which, in CSAG's landscape expert's opinion, are unlikely.</p> <p>9) Another factor leading to the underestimation of visual effects noted in CSAG's LVR was that the adverse effects arising from the proposed mitigating measures did not appear to have been factored into the LVIA's judgements about overall levels of effects.</p> <p>10) During the recent LSoCG meeting, the Applicant's expert stated that the adverse effects had, in fact, been included, which at the time, CSAG's landscape expert accepted.</p> <p>11) However, having looked again at the LVIA, it appears that a) the adverse effects of mitigation on landscape character in terms of the loss of openness were factored in, but disruption of field pattern does not appear to have been mentioned; and b) the adverse effects arising from screen planting resulting in loss of view were not factored in.</p> <p>12) For example, LVIA para. 10.10.636 states that at Year 1, receptors at VPs along PRoWs, lanes and roads between East Claydon / East Claydon Road and Parcel 3 would experience '<i>a major/moderate adverse effect on views from this footpath network, which is considered to be significant</i>'. This section goes on to say that '<i>Once the hedgerows have established to a height of up to 3.5m there would be no views</i></p>
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		<p><i>of the Proposed Development', and effects would reduce to Moderate (significant)'. However, loss of view results in a high level of adverse magnitude of effect, therefore the overall level of effect would remain Major / Moderate Adverse.</i></p> <p>In CSAG's landscape expert's opinion, the adverse visual effects arising from mitigation have not been factored into the LVIA</p>
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### **2) CSAG COMMENT ON OVERPLANTING**

CSAG has commented on the lack of information provided by the Applicant about overplanting and questioned whether this approach accords with EN-3 (2024) paragraph 2.10.71 and the requirement to assess a worst-case scenario

At Page 103 of the Applicant's Summary of Oral Submissions at ISH1 (**REP3-049**), the Applicant says in Response to Agenda item 4:

*"It is difficult to predict what the future generating capacity of a single PV panel will be, but manufacturers are constantly improving the technology. The Applicant considers it reasonable to anticipate that panel efficiency will continue to increase at best linearly over the 2020s (Statement of Need [APP-036] paragraphs 7.8.13 and 7.8.14). The Applicant extends this consideration to panel output (expressed as W/m<sup>2</sup>). The increase in panel output between June 2023, September 2024 and October 2025 shows an increase of approximately 4.2% per year."*

The Appellant has advised that a connection to the grid (for the solar PV) is likely to be available between 2031 and 2035 (p.106 of **REP3-049**). Given that the National Grid has yet to consult on or make a planning application for relocation and redevelopment of the East Claydon substation, it appears unlikely that a connection will be available at the earlier date.

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CSAG has assessed the future potential capacity of the site based on the Appellant's assumed 4.2% increase in panel capacity per year, taking 2026 as year 1, this being the year in which the Applicant has provided its current capacity estimates. However, CSAG notes that the capacity of the scheme was determined at a much earlier stage. Mr Gillet for the Applicant confirmed at ISH1 that the assessed capacity of the site was "*based on assumptions regarding power output of each panel, panel numbers and layout*" at the design stage. (Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) **(REP3-049)**). On the Applicant's evidence, panel capacity will have increased since those assumptions were made.

On the basis of these assumptions, the potential capacity of the site in 2031, the earliest date at which a connection to the grid is expected to be available, would be 411MW, providing overplanting of c.23%.

If the panels were installed for a connection in 2035, potential capacity would be 485MW, providing some 45% overplanting.

The Applicant has refused to reduce the level of planting across the site on the grounds that this would result in a disproportionate reduction in site capacity.

From the Appellant's own evidence, it is likely the scheme would be overplanted at the time of connection, even if the most contested fields were removed.

These fields are:

**B6, B7, B8**, which Natural England has asked be left free of development to protect the Bechstein bats.

**E23**, which Preston Farms/TCS Biosciences would like removed because the field is pivotal to their operation.

**D28, D29**, which Buckinghamshire Council would like to see removed for landscape and ecology reasons.

CSAG agrees that all of these fields give rise to unacceptable adverse impacts and would like to see them removed from the scheme.

Together these fields contribute some 55 MW or 17% of the current assessed 335 MW capacity of the proposed scheme. See Table 1 below.

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If these fields were removed at this stage, and adopting the Applicant's expected annual 4.2% increase in capacity, the scheme could still provide for a capacity of 340MW if installed in 2031 and 401 MW if installed in 2035. This is shown in Table 2 below.

The Statement of Need (**APP-063**) says that there is no proposal for overplanting, for example at 7.6.3, although the Applicant amended this position at ISH1 and now says that improved solar panel efficiency may enable the scheme to deliver greater capacity than the grid connection figure. If the Applicant's position is that there is no commercial requirement to overplant, there is no justification for retaining these fields.

If the Battery Energy Storage System does not secure a grid connection or is removed from the scheme for any other reason, the Applicant's proposal is to install solar PV in these fields, resulting in overplanting over and above these levels. The Applicant has been asked to provide the likely installed solar capacity of fields D8 and D9 if they were not to be used for the BESS. When this information has been provided, this assessment can be updated to estimate likely future levels of overplanting.

### Generating capacity of fields which the Applicant has been asked to remove from the Scheme (contested fields)

FIELD NOS.	CAPACITY MW	PERCENTAGE OF 335MW
B6, B7, B8	15.5	4.6
D8, D29	30.15	9
E23	12.25	3.7

Table 1. Capacity of contested fields. Source: Rosefield Summary of ISH1 REP3-049

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### Capacity with contested fields removed

YEAR	CAPACITY IF SCHEME UNCHANGED	CAPACITY WITH REMOVAL OF CONTESTED FIELDS
2026	335	277
2031	411	340
2035	485	401

Table 2. Potential future capacity with contested fields removed from scheme

## 2) CSAG COMMENTS ON UPDATED BESS PLUME ASSESSMENT SUMMARY (APP3-042)

From Professor Peter Dobson OBE

I have several concerns about the Applicant's response updated BESS Plume Assessment (**APP3-042**).

The first issue is the assertion made in the executive summary (and at paragraph 4.6.9) that: *"The risk of a thermal runaway event has been determined to be a very small risk of failure with a probability magnitude of the event happening as more than 1 in 5000 years."*

This is misleading and wrong. The assertion is said to be based on a Layer of Protection Analysis (LOPA) analysis, but the numbers used in the analysis appear to be guesses, with no justification provided.

LOPA should include a detailed description of the methodology and describe how the numbers were arrived at in the different columns of the LOPA appendix. This applies to all rows in the LOPA matrix.

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- 1) Here are the facts: Although lithium battery failure by thermal runaway is a new topic, the latest design of the safer LFP batteries show a failure of between 0.05 and 0.5 % over their 10-year lifetime. I derived these numbers using published data and AI searches. This means that at the upper end of failure, there is a likelihood of a battery failure involving fire of five events out of a thousand 5 MWh containers, during their lifetime. This poses a considerable risk.
- 2) I also believe that the definition of thermal runaway needs to be clarified because it is being used for two distinct scenarios:
  - a) In the technical scientific literature it refers to dendrite growth within a battery cell that leads to a short circuit internally and overheating and uncontrollable thermal runaway.
  - b) In the other case it is often used to refer to one overheating cell affecting its near neighbours in a sort of chain reaction.

Both are catastrophic and they have different risk factors. This accounts for the spread in failure numbers referred to above in 1).

As regards the rest of the document. The applicant has omitted some of the very dangerous gases that can be produced. For example: there is evidence that very hazardous organophosphorous compounds are emitted (Bergström, U., et al., *Vented gases and aerosol of automotive Li-ion LFP and NMC batteries in humidified nitrogen under thermal load*, in *Försvarets Forskningsinstitut FOI*. 2015)

The remarks about PM 10 and PM 2.5 particles are also not properly quantified. They do not include the ultrafine nanoparticles smaller than PM1 which are the most dangerous to human and animal health (Claassen, M., et al., *Characterization of Lithium-Ion Battery Fire Emissions—Part 2: Particle Size Distributions and Emission Factors*. *Batteries*, 2024. **10**(10): p. 366). These particles can be transmitted directly to the brain and will have long lasting effects. The larger particles of PM2.5 to 10 will deposit close to the fire and could be ingested by grazing animals. These should be quantified as regards to their composition. There is plenty of evidence in the literature now. (see Aiello, I.W., et al., *Coastal wetland deposition of cathode metals from the world's largest lithium-ion battery fire*. *Nature Scientific Reports*, 2025. **15**(1): p. 42113.)

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*Peter Dobson is Emeritus Professor of Engineering Science at the University of Oxford. He has a background in nanotechnology, especially in safety issues and he has taught courses on Environmental Technology and Energy, founded the Energy Society in Oxford University, and is published on battery safety.*

### **3) CSAG REQUEST FOR FURTHER SITE VISITS**

CSAG has been approached by several members of the local community who would like the Inspectors to visit their homes to understand how they will be affected by the proposed development.

The two tables attached list these properties: Table A is a list of properties which would afford views of the development from Botyl Road, Church Way and Hinton Close.

Table B is a list of properties which would afford views of the development from Hogshaw, Orchard Way & Weir Lane.

CSAG is aware that the Inspectors' time is limited and that visits to all of these properties may not be possible.

We would suggest that visits to the following properties from the lists would be of great value in understanding impacts on local residential amenity and the wider landscape.

From Table A.

#### **White House**

Views from this property are illustrative of the impact on other dwellings with views east to the existing National Grid sub-station and beyond. Following implementation of the scheme, the view would also include the proposed Rosefield sub-station in fields SA57, SA52 & SA53 and fields E10 & E11 in Parcel 3.

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### **Botolph Farmhouse**

Views of this property are illustrative of those from properties in the Botolph Claydon Conservation Area, taking in Winslow & Granborough in the distance and overlooking Parcel 3 in the foreground, including fields E21, E22 & E23 and the proposed cabling corridor in fields SA47 to SA 50 inclusive. The Botolph Claydon Conservation Area Assessment (1991) identifies the importance of these views:

*“Both to the north of the pond and to the south of Botolph House are fine views across open countryside. A similarly fine view is afforded in a southerly direction immediately to the west of this property.”*

*The current proposal would undermine this identified view, replacing open countryside with development visible along the ridge line.”*

From Table B:

### **Bernwood Farmhouse**

Views to the west from this property would overlook the western area of Parcel 2 with Home Wood in the distance. Views to the south, towards Runts Wood & Quanton Hill would include the majority of the solar fields in the northern area of Parcel 2. Views to the East take in Winslow, Granborough & North Marston in the distance and fields D6, D44 & D45 in the foreground.

### **23 Orchard Way**

Views of this property are further illustrative of impacts on views identified in the Botolph Claydon Conservation Area Assessment. This property directly borders the development site and has clear views to the south with solar development on a ridge line approximately 600 metres due south changing topography and skyline.

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### **Hogshaw Hill Farm**

The public right of way crossing Hogshaw Hill and looking north affords panoramic views of the whole proposed development and its wider rural setting.

A visit to this location would enable an understanding of the adverse impact on users of this ancient and popular route, who currently enjoy largely unspoilt views across five counties from this high point in the landscape. It would also enable visualisation of the extent to which the landscape would be changed by the proposed development, both in terms of the form of the development and its area of coverage.

The site is best reached by car to the farmhouse, where parking is available, and from which the right of way and the summit of the hill can be reached in a short walk.

### **8 Sovereign Close, Granborough**

Views from this property are illustrative of impacts on properties to the east of the site. Views extend to Bernwood Farm and Botolph Claydon to the West and will overlook the majority of Parcel 3 including fields E10, E11, E20, E21, E22 & E23.

### **Fields B3-B10**

CSAG would also encourage the inspectors to visit fields B3-B10 to understand the enclosed nature and high biodiversity value of this part of the site containing old pasture and wide overgrown hedge margins, essentially woodland corridors, with mature trees.

**PINS ExA Property Visit Requests - Table A**  
**Views of Rosefield Development from Botyl Road, Church Way & Hinton Close**

ADDRESS	NAME	EMAIL	CONTACT NO	JUSTIFICATION FOR VISIT	OTHER INFO	STATUS	REFERENCE	LOCATION
Botolph Farmhouse, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be SIGNIFICANTLY negatively impacted by the development.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.	CSAG 31	Botyl Road
Ivy Nook, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Not listed	Property occupier has previously emailed (21st April 2026) a request to be visited by ExA.	CSAG 19	Botyl Road
1 Hinton Close, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Views from the property will be negatively impacted by the development.	Not listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Hinton Close
The White House, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Please refer attached photos from The White House. All photos are looking North East over to the existing National Grid station and beyond, were taken from our field to the north of our property. We think that the proposed Rosefield development will generate visual harm. The photo with the driveway (also looking N.E.) was taken from the first floor east side/east elevation (above the ground floor kitchen). The other photo taken from the field with the picnic bench in it is looking North which will be impacted (in terms of visual harm) by the proposed BESS development.	Grade 2 listed	Property owner has previously emailed a request to be visited by ExA, but they did not email the ExA. They only emailed it to CSAG!		Church Way
10 Botyl Road [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Our neighbour asked us to send you some photographs of the view from our house. So please find some as attached. It would be a real shame if the rural setting of the villages were damaged by the mega solar farm project.	Not listed	Property owner has previously emailed a request to be visited by ExA, but they did not email the ExA. They only emailed it to CSAG!		Botyl Road
The Old Vicarage, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Not listed	Property owner has previously emailed (12th March 2026) a request to be visited by ExA.		Church Way
4 Botyl Road [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise & light pollution during construction.	Not listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.	CSAG 31	Botyl Road
Willow Cottage [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Botyl Road

**PINS ExA Property Visit Requests - Table A**  
**Views of Rosefield Development from Botyl Road, Church Way & Hinton Close**

ADDRESS	NAME	EMAIL	CONTACT NO	JUSTIFICATION FOR VISIT	OTHER INFO	STATUS	REFERENCE	LOCATION
Botyl Cottage				Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution from the BESS during operation and light pollution during construction.	Grade 2 listed	Property occupier has previously emailed (24th April 2026) a request to be visited by ExA.		Botyl Road
Botolph House,				Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Grade 2 * listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Botyl Road
61 Botyl Road,				Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise & light pollution during construction.	On the LAH list	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Botyl Road

**PINS ExA Property Visit Requests - Table B**  
**Views of Rosefield Development from Hogshaw, Orchard Way & Weir Lane**

ADDRESS	NAME	EMAIL	CONTACT NO	JUSTIFICATION FOR VISIT	OTHER INFO	STATUS	REFERENCE	LOCATION
33 Weir Lane, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution from the BESS during operation and light pollution during construction.	Within conservation area, not listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.	CSAG 7	Weir Lane
Weir Cottage, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution from the BESS during operation and light pollution during construction.	Grade 2 listed		CSAG 7	Weir Lane
19 Orchard Way, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution during operation and light pollution during construction.	Not listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Orchard Way
Pond Cottage, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution from the BESS during operation and light pollution during construction.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Orchard Way
Hogshaw Hill Farm, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.	CSAG1	Hogshaw
24 Orchard Way, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of the property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Not listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Orchard Way
23 Orchard Way, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Orchard Way
21 Orchard Way, [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Setting of Grade 2 Listed property will be negatively impacted by the development. Views from the property will be negatively impacted by the development.	Grade 2 listed	Property owner has previously emailed (24th April 2026) a request to be visited by ExA.		Orchard Way
Berwood Farm, [REDACTED]	Currently Unoccupied (Tennant Farmer has surrendered his lease)			Setting of property will be negatively impacted by the development. Views from the property will be negatively impacted by the development. There are also concerns regarding noise pollution from the BESS during operation and light pollution during construction.			CSAG 7	Weir Lane