

EN010158 – Rosefield Solar Energy

Issues not resolved through Deadline 4 submissions by the Applicant

Interested Party: [REDACTED]

Ref.	Topic	Comment
1	Heritage Assets – hidden assets	At several points throughout the Examination process, attention has been drawn to the absence of archaeological information on Fields within the Order Limits, SA51-59 and E20-22, which may hold important hidden, heritage assets that would provide valuable information on the extent of Iron Age-Roman settlements (HA1/MBC45205) and the route of Roman road, Margary 162, (MBC6013). [See e.g. REP1-159, Para. 6.11; REP3-051, 5.11.8 (ExA Q1.10.4)]. The Applicant has stated that results from the National Grid trial trenching investigation would be sought in order to gain a more complete picture of the totality of hidden assets and, hence, the potential impact upon them. However, these results have yet to be provided. The investigation was undertaken in September 2025 and it is implausible that the results are not yet available. It is submitted that the Applicant should provide this information in advance of Deadline 6.
2	Heritage Assets – Listed buildings in East Claydon	The Applicant has revised 6.2.3 Environmental Statement Volume 2 Chapter 9 - Cultural Heritage as REP4-030 to include assessment of the impact of the proposed development on the Grade II* Listed St Mary's Church. The analysis concludes (Paras 9.10.41, 9.10.96 and 9.10.52) that, although the importance of the building is accepted as High, the impact during construction is considered to be Negligible, the impact on its setting during operation of the scheme as Minor and that during decommissioning as Negligible. I disagree with this analysis. Furthermore, the Applicant should have included the adjacent Grade II Listed White House and its associated Listed Wall in their assessment. These two buildings hold a prominent position on the ridge at the eastern margin of the village, with the White House looking across the visible signs of the former, Medieval platform village. For over four centuries, St Mary's Church and the White house have provided the first view, across open fields, of the village of East Claydon, across open fields, whether approached from Winslow or the former coaching road up Sion Hill. It is misleading to suggest that the impact of the Applicant's scheme on the setting of these important heritage assets would not be significant. Taken together with the other proposed and approved local, electrical infrastructure projects, St Mary's Church and the White House would be set against the backdrop of a vast

		and incongruous industrial scene. No objective assessment would conclude change on that scale as Minor or Not Significant.
3	Transport issues – cumulative impact	In response to a request from TCS Biosciences/Preston Farms (TCS/PF), the Applicant has reviewed an alternative route for construction traffic in an effort to minimise the impact on TCS/PF operations. The review is published as REP4-087. Para. 3 of the review notes the likely cumulative impact of the approved and proposed electrical infrastructure projects (Statera BESS, Statkraft BESS, National Grid substation) on the route from Buckingham via Winslow to the East Claydon Road. They note also that HS2 construction work is likely to coincide with their own construction period (REP4-087, Table 2.1). The Applicant makes an important point here. However, what they fail to acknowledge is that their own proposed construction route from the A41 via Quainton and Claydon Road is part of a wider, local road network with very limited options for alternative routes. There is frequent reference to their construction traffic route being 'outwith' that for the Applicant's scheme (e.g. REP2.037, Para.17.7.115. <i>"It is noted that ID No. 1 East Claydon BESS has now been determined. The construction traffic access route for this development is outwith the study area, with the only potential interaction being with ALL deliveries."</i>). It is disingenuous to suggest that large increases in traffic (especially HGVs) on the Applicant's preferred construction traffic route would not have a wider impact on the road network, especially where the cumulative impacts of other projects are accepted to be substantial. The Applicant should be considering the total increase in volume of traffic across the whole local road network (much of which is unsuitable for HGVs), over the period late 2020s to early 2030s.
4	Transport issues – non-motorised road users	The Applicant has consistently avoided responding to requests to be directed to their source data for baseline numbers of non-motorised road users on the proposed construction route (e.g. REP3-058, Para. 5.2), referring instead to the Outline Rights of Way and Access documents (e.g. APP-058, REP2-071). This takes us no further since the document considers only users of Public Rights of Way, not the local highways. This is a serious omission from the Applicant's assessment of baseline conditions and the safety of non-motorised road users, the number of whom is considerable, especially for cyclists. The Applicant's only concession to this group is to instruct drivers to abide by speed limits. Did the Applicant undertake counts of non-motorised road users as part of their transport assessment?
5	Cumulative impacts	The Applicant continues to address the intra- and inter-project cumulative impacts of their scheme as though matters such as landscape, noise, transport issues, heritage assets exist in silos when it is the totality of the impacts that will be experienced by local communities.

Further, the Applicant asserts that the impacts of other projects would be negated through mitigation rendering the cumulative impacts non-significant. This is an indefensible position and the Applicant should provide an honest and realistic assessment of the true impacts.

Dr Chris Jordan

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