DCO Application by Rosefield Energyfarm Limited

for the Rosefield Solar Farm

(EN010158)

Closing Statement

1. Introduction

1.1 As a resident of East Claydon, I am very much aware of the challenges faced by local communities over recent years as a result of major infrastructure projects such as HS2 and EWR. The disruption caused cannot be underestimated. Recent approvals for the Tuckey Farm solar installation, the East Claydon BESS (Statera) and 'Greener Grid Park' BESS (Statkraft) together with the prospect of National Grid's major project to build a replacement substation, threaten to disrupt lives during extended construction periods and change our landscape and our communities permanently.

1.2 The matter is further exacerbated by the recent publication of Buckinghamshire Council's Regulation 19 version of the draft Local Plan which envisages an additional 6,415 dwellings to be built around the nearby town of Winslow during the period to 2045.

1.3 Ultimately, it is understood that the decision as to whether the DCO for Rosefield scheme rests on the overall planning balance and the test of exceptionality. In the present case, a key question is, "To what extent do exceptional circumstances outweigh the presumed benefits of a renewable energy scheme?"

1.4 In Table 1 below, reproduced from National Policies EN-1 and EN-3, are some of the criteria set out as the basis for the Secretary of State's decision, on a case-by-case basis, together with an assessment of the extent to which the Applicant has provided evidence to comply with them.

Table 1 NPS criteria for assessing applications for renewable energy projects and the Applicant's position

NPS EN-1 or EN-3 Ref.	EN-1/EN-3 Statement	Assessment of Applicant's Position
4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits; • Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.	As regards the second bullet, the Applicant has neglected to follow the mitigation hierarchy from the initial point of site selection. Had they done so, many of the critical, negative impacts on environmental, socio-economic, residential and recreational amenity and human health matters could have been avoided. The Applicant has attempted to retrospectively justify the rationale for site selection but, in doing so, has created situations where it is not possible to avoid or mitigate key adverse impacts.
4.1 6	In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.	I submit that the Applicant has sought to emphasise the perceived benefits of the scheme whilst seeking to minimise the adverse impacts. By way of example, they argue that benefits would accrue through the introduction of new rights of way whilst ignoring the fact that the amenity value of almost all of the existing PRoW network would be compromised through restriction of views by new and taller hedges and industrialisation of the landscape. Generation of electricity from solar panels, planted in productive arable fields formerly carefully managed by a third-generation tenant farmer, is emphasised as a positive, but the surrender of land and loss of the farmer's expertise and livelihood is seen as no more than a business transaction. Planting of solar panels and construction of a substation on agricultural land to generate and transmit electricity is promoted as a positive. IN contrast, concerns over potential threats to the management and well-being of large herds of livestock central to a biotech business supplying

		crucial diagnostic materials to the NHS are (incorrectly) dismissed as an overreaction and easily avoided through mitigation.
4.2.24	Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.	The Applicant has systematically failed to adopt the mitigation hierarchy principle. This is evident in the simplistic approach to site selection, in the failure to understand and, hence accommodate, the needs and sensitivities underpinning the business activities of Preston Farms/TCS Biosciences and the eleventh-hour changes to the solar panel layout in an attempt to minimise the impacts of the scheme on the habitat for Bechstein bats, despite the vulnerability of the population being widely known.
4.3.18	The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details.	Throughout the application process, the Rochdale Envelope principle has been adopted as a device to defer confirmation of detailed design to a later stage. This has left many uncertainties, not least of which are the storage capacity (and hence scale) of the BESS, extent of overplanting of solar panels (hence visual impacts) and noise levels. Assessment of cumulative impacts has been inconsistent and but consistently seeks to minimise the magnitude and significance of the effects in its conclusions. In the absence of such detail, the question arises as to whether the Applicant has presented the worst case for each aspect of the design and its consequences. I suggest that they have failed to do so.
4.3.19	The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	This is a key issue. For the most part, the Applicant's approach in assessing the impacts of the scheme on an intra- and inter-project basis, has been to consider each receptor and each intruding element separately. This means that, for example, the impact on the amenity value of the landscape is experienced from the perspective of an individual at a fixed point, looking in one direction with their ears covered. A judgement is then made as to what they can see. The reality is that landscape is experienced in a dynamic way and through all of the senses. In the real world, walkers or equestrians travelling along the PRoW network would experience different views, different scents and sounds, different wildlife as they proceed. Since all of these would be impacted by the Applicant's scheme and by other electrical infrastructure projects across a vast area, that is how the proposed development should be presented and judged regarding how accumulation of, and interrelationship between projects might affect the environment, economy, or community as a whole.

		The Applicant's suggestion that mitigating measures associated with other projects would avoid any cumulative impacts is self-evidently incorrect.
4.4.5	The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.	As noted above, the Applicant has adopted an inconsistent approach to assessing cumulative impacts. Access to the countryside through the PRoW network is fundamental to providing recreational amenity and the health and well-being benefits that accrue from it. The stresses associated with the construction, operation and decommissioning periods for the various schemes will transform that asset into an area that has lost its rural character and tranquillity. Loss of that amenity carries with it significant implications for the health and well-being of local residents, as well as visitors from further afield. The Applicant's scheme raises particular issues as regards health in a wider sense and on a national scale. The products of Preston Farms/TCS Biosciences are the lynch pin for a wide range of diagnostic evaluations undertaken in the NHS on a daily basis. There is a direct link between those products, the successful diagnosis of (e.g.) a serious bacterial infection and the choice of the most appropriate anti-bacterial agent(s) to treat it. Put bluntly, patients' lives depend on those products. I am not party to conversations between the Applicant and Preston Farms/TCS Biosciences, but it is clear from written submissions and comments made during the Issue-Specific Hearings that the Applicant is either unable or unwilling to grasp the importance of these businesses, the sensitivities in their operation and the nature of the regulatory controls to which they are answerable. A simple example of the latter point is the Applicant's response to a question posed at 3.12.12 of **REP4-081**, "If the Home Office were to conduct an unannounced visit to Preston Farms Ltd and TCS Biosciences Ltd, 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?" The Applicant's response carried a disturbing caveat, "*The Applicant is confident that individual members of staff would be aware of and comply with the contents of the toolbox talk* ***insofar as the requirements relate to their particular role on-site****."* (My emphasis). The implication from this is that the guidance only

		applies to certain members of staff. Nothing could be further from the truth. Any disturbance to the business, including failure to comply with Home Office regulations, has far-reaching implications for the supply of diagnostics products to the NHS and, therefore, the health of its patients.
5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	It is clear that, were the development to proceed, it has the potential for significant impact on key habitats, notably for Bechstein bats, radiating from the SSSI, Sheephouse Wood. The Site within the Order Limits also includes part of the proposed Bernwood SSSI whose designation is temporarily halted but, nevertheless, is indicative of the importance of the area. The Applicant has made last-minute changes to the layout of the scheme but this is too little, too late and reflects a failure to adhere to the mitigation hierarchy principle.
5.8.7	Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.	The Applicant's approach to assessing flood risk is based on desk-top reviews and modelling studies. This approach has been preferred over winter-time, on-site assessments. Local knowledge and experience is such that flooding is an increasingly frequent occurrence, especially in Parcel 3 of the Site. The Applicant has made some provision for flooding insofar as solar panels in that area would be mounted 1 metre higher than at other locations. However, there is concern that they have grossly underestimated the impacts of flooding and the damage that would be caused to soil character when working the area or moving vehicles across it in wet conditions.
5.9.14	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.	The extent of the impact on hidden heritage assets cannot be assessed until such time as the Applicant provides the results of the National Grid archaeological investigations within the Applicant's Order Limits. The Applicant's submissions do not provide a full account of the impacts of their project alone or in combination on the setting of built heritage assets, especially those in East Claydon, but also on the setting of the Botolph Claydon Conservation Area.
5.10.4	Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific	The large area encompassed by the Order Limits is clearly a factor here. The overall footprint of the scheme when added to the large number of other electrical infrastructure projects, approved and proposed, plus the

	siting and design make the assessment a case-by-case judgement.	major impacts of the HS2 and EWR railway mean that there is an exceptional extent of change to a landscape that it essentially rural.
5.10.14	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	As has been indicated in the foregoing, the effects of the proposed development on the quality of life, health and well-being for residents and for visitors who value and engage with the landscape, are immeasurable. It will be impossible to escape from the industrialisation of the landscape bounded by security fences and CCTV surveillance cameras.
5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity and nature conservation.	Where the existing, panoramic views haven't been screened by incongruous tall hedges, the landscape would be dominated by rows of solar panels, BESS containers, collector compounds and the substation. The topography of the Site means that much of it will be in view from a distance. The area is currently noted for its dark skies. These will be lost during the construction and operational periods, especially in the winter months.
5.12.1 **5.12.4** **5.12.7**	Excessive noise can have wide-ranging impacts on the quality of human life and health such as annoyance, sleep disturbance, cardiovascular disease and mental ill-health. It can also have an impact on the environment and the use and enjoyment of areas of value such as quiet places and areas with high landscape quality. Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. The nature and extent of the noise assessment should be proportionate to the likely noise impact.	The Applicant has consistently downplayed the level of noise associated with the proposed project, whether it be during construction, operation or decommissioning. It is acknowledged that, of itself, noise emitted from the BESS would be intrusive. Having visited an operational BESS (of smaller capacity than the one proposed), the amplitude and frequency range of the sound emitted made it impossible to tolerate for more than a brief period. Noise emissions would not be limited to those from the BESS Given that there would be two other BESS installations operating in the area plus the proposed National Grid replacement substation with its large transformers and noise-emitting overhead cables, the transformation of the soundscape from it its present near-silence (especially at night) and tranquillity to one of an industrial complex, with its alien sound frequency range as well as volume. 5.12.4 also notes the potential for impacting wildlife and biodiversity. To this should be added concerns over the impact on farm livestock.
5.13.8	The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development.	It is difficult see how mitigation can offset key socio-economic impacts including: • Loss of residential and recreational amenity for residents and visitors;

- Unresolved issues relating to impacts (both immediate and foreseeable) on the Preston Farms/TCS Biosciences businesses and, by implication, the smooth operation of NHS diagnostics services.
- Disruption of local agriculture; loss of livelihood and generational expertise for tenant farmers;
- Adverse impacts on the health and well-being of local residents and visitors.

2. The Cumulative Impact

2.1 From a resident's perspective, a key question is how would the world around the Claydons appear if the Applicant's project and the other electrical infrastructure projects were to proceed? There are three elements to this; the construction phases (which could extend over a period of five years), the operational phases, which for most of the schemes would last for a total of, say, 45 years, and then the decommissioning phases lasting another five years. Assuming that none of the schemes would begin construction until around 2029-30 (since all are contingent on National Grid constructing a replacement substation, overall, the impact would be experienced well into the 2080s. The exception to this would be the National Grid substation which would have an anticipated life-cycle of perhaps 60 years.

2.2 Viewed in this way, although the Applicant (along with those for the other BESS and Solar projects) promotes their scheme as being temporary, it is effectively permanent, even for the youngest of our residents.

2.3 So what would be gained and what would be lost? The need for sources of renewable energy is well-established and so the Applicant's scheme has that in its favour. NESO's assessment of need for short-term storage of electricity is that it has been met several times over by projects in the pipeline. Two 500MW BESS installations intending to connect to the East Claydon National Grid substation have planning approval, although their connection status is unclear. In any event NESO's position is that the real need is for longer term storage of power, a need that BESS installations cannot fulfil. Furthermore, the Applicant has admitted that the solar installation element of their proposed development could operate without the BESS and so its primary purpose would appear to be commercial arbitrage. This, the BESS element of the project offers no real benefit and this is confirmed by its Gate 1 status.

2.4 Thus, the principal, I would argue ***sole*** benefit of the scheme would be the generation of electricity from a renewable source. However, the Applicant has downgraded the contribution to the national energy supply from the original 500MW to 335MW, so a somewhat more modest input.

2.5 What would be lost? Perhaps the easier question to answer might be, 'What is left?' Consider the scene, post-development, along the network of public footpaths and bridleways. Currently, they give access to a wide range of flora and fauna and experience of the changing seasons. They provide the principal visual, auditory, olfactory and recreational amenity for residents and visitors across the local countryside.

Post development:

- Were the Applicant's scheme to be approved, walking along Three Points Lane the view (where it's not artificially screened by high hedges) would be sea of solar panels.
- Walk down the drive to Muxwell Farm formerly alongside the idyllic setting of cows grazing on one of the area's best-preserved examples of a ridge and furrow field, a section has been torn up to provide an internal road for the solar installation.
- Next, walk up Splash Lane towards Runts Wood. Once this provided open views across arable fields towards the distant hills. Formerly, as you progressed, large numbers of skylarks rose into the air. Now the view is interrupted by hedging and security fencing with CCTV cameras mounted at intervals along the way and the skylarks have gone.
- Move alongside Runts Wood. As you proceed up the hill, the setting for the Conservation Area of Botolph Claydon and Bernwood Farm is no longer one of open fields but solar panels and the BESS. Hoping to experience the beauty of the bluebells in Runts Wood against a rural backdrop, a mountain of steel and glass rises before you in Felds D28-9.
- What unspoilt, open space remains? You try walking down Weir Lane to the footpath leading down from Bernwood Farm, but it is the same picture. More solar panels and then there is the BESS below. Why would I want to proceed down that path accompanied bhy the noise of the BESS?
- Walking along the ridge through Botolph Claydon village, with the Listed Botolph House and Botolph Farm overlooking the valley, one sees more electrical infrastructure on the valley floor.
- Church Walk, lined by majestic trees and hedges provides a brief respite from the industrial scene until you come to Sion Hill. Here the scene is really grim. Not only do you descend to more solar panels, but the substation rises up ahead of you. Then there is the Statera BESS substation and, most dominant of all, the towering presence of the National Grid substation, with its pylons and overhead lines.
- Even resorting to a bicycle or car around the perimeter of the site, there would be no escape from the industrial landscape. Approaching the villages from Calvert Road, Claydon Road or East Claydon Road, the scene would be one of solar panels, BESS installations and substations.
- Seen from the elevated viewpoint of Hogshaw Farm with the extraordinary, panoramic scene below, the Applicant's proposed development has had a devastating impact on a landscape that had remained essentially unchanged for centuries.

2.6 So, in answer to the question, "What would be left?", the answer is "very little" in terms of **the** principal residential and recreational amenity for the local communities. Had the Applicant undertaken a more realistic approach to determining the intra- and inter-project cumulative effects of their scheme, I suggest they would have arrived at the same conclusion.

3. Conclusion

3.1 Most communities are naturally resistant to change but the decision as to whether to introduce change depends on the value it brings to both to the local and to the wider community. Whilst there is a presumption that the need for sources of renewable energy will normally outweigh the disadvantages that a given project may bring, I submit that, in this case, the planning balance swings heavily in favour of rejecting the application.

3.2 In Table 1, have indicated where I believe the proposal fails to comply with several of the criteria that inform the Secretary of State's decision-making process. In Section 2, I have highlighted the extent and magnitude of change that the Applicant's scheme would have on the rural landscape. Of themselves, I suggest these provide significant weight against approval. However, there are other, exceptional reasons why I believe the presumption of approval should be overruled.

3.3 Principal amongst these is the Applicant's inability to provide adequate assurances that the combined businesses of Preston Farms and TCS Biosciences would not be adversely affected by construction work or the loss of land.

3.4 The significant risk to the important Bechstein bat population remains unresolved, notwithstanding the Applicant's last-minute changes to some of the B-Fields.

3.5 The Applicant's approach to wintering birds is inadequate and the threats to the important skylark population, both from the Applicant's scheme, alone and cumulatively with other infrastructure projects, is a major concern.

3.6 Finally, the cumulative impacts of the Applicant's scheme, together with those already approved and the National Grid proposal for a replacement substation, are of such profound scale that a rural area would be transformed into a monumental industrial site.

3.7 For these reasons, I respectfully submit that the DCO should not be granted.

Dr Chris Jordan

August 2026