



Rosefield Solar Farm  
FREEPOST SEC Newgate  
UK LOCAL

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Tuesday 12th November 2024

To Whom It May Concern:

**Response from Greg Smith MP to Rosefield Solar Consultation**

Please accept this letter as my response to the updated proposals for what is being called the 'Rosefield Solar Farm' in the Claydons area of North Buckinghamshire in my Mid Buckinghamshire constituency.

Below I outline, and in several instances reiterate, my objections to what is very questionably an updated proposal that in my view does little to alleviate mine and the community's concerns.

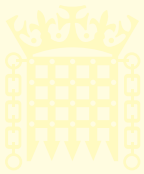
The cumulative impact of Rosefield and related energy infrastructure planned for this area remains severe. There is nothing appreciably new in these proposals that addresses the community's concerns, and those changes that have been proposed create a series of additional concerns that have yet to be addressed. These are outlined in full below.

**This project remains wholly unsuitable for this rural area**, which as I made clear in my previous response has already been heavily impacted by other major infrastructure projects, including HS2. As such, in my view the design changes that the applicant claims to have made will **not** mitigate the overall impact and in most cases has raised more questions than answers.

**Construction impact**

There has been no recognition or appreciation of how disruptive the construction phase of the project would be. The applicant has proposed a construction route through the village of Quainton, which is heavily used by my constituents and is already in a poor state of repair - as are many of the local roads leading to/from East and Botolph Claydon which have already been damaged by HGVs working on other major projects in the area, above all East West Rail and HS2.

Despite the applicant offering a community fund of £400 per megawatt per year of operation, this fails to account both for the astronomical cost of road repairs and the fact that community organisations are not responsible for road maintenance. Disappointingly, the applicant has not been forthcoming as to whether and how much they would be willing to offer to the local authority for road repairs. Until this is determined and shared with the community, I consider this application incomplete and therefore unable to be properly examined.



Moreover, the applicant does not outline the impact of lighting both during the construction and operation of the site. This would be particularly pronounced during winter months, as residents have experienced with existing and past projects in this area, including from HS2 and East West Rail. The extensive footprint of the site would create significant light pollution for the surrounding area, particularly for the villages of East Claydon and Botolph Claydon as these are situated atop a ridge that looks down onto the proposed site. The applicant has not offered any mitigation for this light pollution and has not explained whether the site would need to be lit 24 hours per day.

The impact from soil excavation during construction also presents hydrological challenges in so far as the land's ability to retain water during periods of heavy rainfall, and thus how much runoff enters the nearby watercourse that feeds the larger Padbury Brook. With significant excavation required for foundations to be laid and for ground reinforcements to be installed, it is inevitable that the land will hold less water and would thus heighten the flood risk. This is a common occurrence in this area; seasonable flooding can become severe to the point of blocking both pedestrian and vehicular access to nearby farms, some of which are required by the applicant. Should a fire occur access for emergency services could therefore be compromised, worsening an already life threatening situation.

### **Loss of agricultural land**

The applicant claims that the overall proposed site has been reduced by 14 per cent since their initial consultation, but this still risks a significant amount of agricultural land being lost. Indeed, the revised figure of 1,906 acres fails to take into account agricultural land under which cables will run; this will still remove said land from food production during the construction phase.

The applicant also fails to understand that land which they claim is being 'set aside for nature' is of little if any benefit to the community. Rather it is the use of land for agriculture that is of fundamental importance, above all else, to this community. Farming brings economic growth and a skills base to this area, as well as maintaining the landscape. The scenic beauty of the landscape attracts tourists to the area, who in turn support local businesses including pubs, cafes and fundraising events for community organisations such as local charities and targeted support initiatives for vulnerable residents. The visual blight that would result from the applicant's proposals would remove this attraction and thus deprive the area of much-needed income.

Moreover, the loss of jobs especially for young people that the loss of farmland would entail would be economically devastating for the area. Employment derived from farming, including short-term seasonal employment, is critical for a local rural economy such as this. Income earned locally is spent locally. By removing this income stream through land lost to this project the applicant risks depriving the area and local residents of the ability to earn and spend.

### **Cumulative impact**

As in their original proposals, the applicant has not demonstrated a suitable or efficient use of land for their project. The applicant has not put forth a detailed understanding of other energy infrastructure projects planned for this area, all of which in this case are mutually dependent on each other. The applicant is well aware through conversations that I and other local representatives have had with them that their proposals are heavily reliant on the adjacent National Grid substation, which itself is due to be upgraded and expanded to accommodate the electricity generated by the Rosefield project.

As a result of said conversations, it is clear that the applicant's proposed site had not been selected on the basis of its suitability or its appropriateness to the locality, but was instead driven by the relative proximity of the substation



and the convenience of dealing with a single landowner, in this case the Claydon Estate. The applicant's proposal is therefore severely questionable and weak in satisfying what I consider a reasonable impact assessment of the land they are seeking and whether the site can be considered for development elsewhere.

The scale and devastating impact of this project through such a substantial loss of agricultural land warrants a far more detailed breakdown of what each field or plot of land is to be used for by the applicant. At present the applicant's planning documents offer nothing more than a wish list and associated ideas for mitigating the project's impact without identifying where the most severe impact points.

### **Greenhouse gas emissions**

The applicant has not provided a fair and reasoned assessment of the true scale of the negative environmental impact of their proposal vis-a-vis the purported benefits, which in my view are far outweighed by the former.

There is no mention in the applicant's proposal of the expected carbon emissions generated by the construction of Rosefield, all of which will take the form of deliveries by road as there is no suitable alternative route into this area. Moreover the substantial size and weight of the equipment required both for its construction and operation, including ground reinforcement panels, generators and lighting fixtures as well as piling equipment and the panels themselves. As such the applicant has not provided a fair assessment of Rosefield's environmental impact, which given the applicant's rationale of the project being driven primarily by environmental benefits through 'clean' energy production is misleading for local residents.

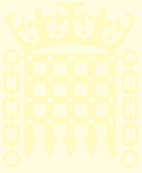
Furthermore, it is clear through extensive research conducted by local organisations that the solar panels for use in the Rosefield project are to be manufactured in China using forced labour, likely with minimal regard for the carbon emissions generated in the process. Likewise the transportation of panels from China to the UK will produce equally significant amounts of carbon emissions. This has not been factored into the applicant's environmental impact assessment, adding to the misleading nature of their promotional material.

### **Site location changes and fire risk**

The applicant makes significant mention of moving their site further from the village of Botolph Claydon, which will be heavily impacted regardless of where the site is located, as per my comments above. The applicant has omitted that by moving their site to a minimum of 155 metres from Botolph Claydon this would place the site closer to the nearby watercourse, which feeds the Padbury Brook.

This would create the potential for water contamination during both the construction and operation of the site. Indeed, in the event of an on-site fire the watercourse would risk becoming severely contaminated with runoff from residue resulting from the fire. This risks a wider public health hazard, which along with that posed by smoke inhalation in such an event creates an unacceptably high risk to residents and the local ecosystem.

Moreover, as I made clear in my previous response, the ability to fight an intense fire in this area is severely compromised by this area's single track roads and the nature of the terrain. This is because the site BESS units, which we are told by the applicant are integral to the site's operations, have a relatively high risk of combustion compared to other parts of the site. Such a dense collection of lithium-ion batteries and operational equipment severely heightens the risk of an uncontrolled explosion and fire, as the fire would likely spread quickly and violently to other parts of the site. This would not only threaten not only the surrounding properties but toxic smoke could easily reach the nearby villages of East Claydon and Granborough as well as the much larger population of Winslow.



### **Limited fire fighting capability**

This would be exacerbated further if such an event were to occur during an instance of flooding, which is not uncommon in this area between September-March. Not only would access to the source of ignition be severely hampered; the response from the local fire service may also be hampered by the flooding that occurs from runoff in adjoining fields. This reflects similar circumstance to those faced in the case of a 150MW BESS at the Cleve Hill Solar Park project in Kent, where in March 2024 rejected the developer's application, citing a lack access as being one of the primary concerns for local residents especially in the case of emergency services access.

The response from fire crews would be hampered by the single-track roads that surround the perimeter of the site; once operational the only access to the site in an emergency would be from Hogshaw Road, a narrow single-track road with extremely limited space for vehicles to manoeuvre. The use of just one entrance does not satisfy the requirements set out by Buckinghamshire Fire and Rescue Service for fire appliances during the lifetime of the development.

The process of firefighting is also noteworthy with regard to the resources involved. The volume of water required is extremely large. The explosion and fire of a small battery storage site in Belgium in 2017 required 1.4 million litres of water to contain.

Indeed, even with the proposed second temporary access point from East Claydon Road during the construction phase fire crews would still have to negotiate a narrow crossing over a perimeter stream to reach any faulty equipment, thus further slowing the response time and associated risk of the fire worsening. Once completed, the only permanent access point would be from Hogshaw Road; prevailing winds could cause smoke to block or partially block this entrance due to limited street lighting along this section of Hogshaw Road, again further delaying the response.

The planning guidance on battery storage proposal specifically highlights the need for applicants to liaise with the fire and rescue service. While I note that has happened to some extent, the numerous recommendations from the national guidance does not appear to have been addressed as yet and it would be helpful if the applicant responded to the submitted documents as this could have further impact on the layout and land take if access arrangements for example are not agreeable to the fire and rescue service. The submitted fire safety documents only raises questions rather than a firm proposal.

Several precedents have been set on the real-world risk of fire from BESSs in recent months and years, which in my view are absolutely applicable to this site. For example, in March 2024 Dorset Council rejected a 60MW facility in the village of Chickerell primarily due to both the risk of combustion and difficulties for fire services to respond. Combined with the pollution risk from contaminated water runoff following a fire, this lead to the application being refused.

Yours sincerely,

**Greg Smith MP**  
Member of Parliament for Mid Buckinghamshire