



HOUSE OF COMMONS
LONDON SW1A 0AA

ROSEFIELD SOLAR 'FARM'
PUBLIC CONSULTATION

by email: info@rosefieldsolarfarm.co.uk

Thursday 9th November 2023

To Whom It May Concern,

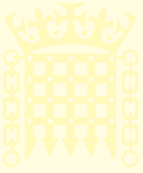
OBJECTION TO ROSEFIELD SOLAR 'FARM'

Please accept this letter as my response to the preliminary consultation for what is being called the 'Rosefield Solar Farm' in the Claydons area of North Buckinghamshire in my constituency. Below I outline the primary concerns my constituents have relayed to me and set out my opposition to this proposed and very much unwelcome development that has been substantially rejected by the local community.

The Claydons are a wholly inappropriate environment for all types of activities required both to build and to run these sites. This proposed mega-project does not take into account the cumulative impact of other large infrastructure projects in this rural setting. My constituents have suffered daily and long-term misery on several fronts as a direct result of existing mega-projects in this area, for which there has been little to no alleviation or compensation at any stage. It is my belief, based on the information I have seen at public drop-ins, printed and online materials, as well as the feedback I have heard, that Rosefield Solar 'Farm' will be no different in this regard. Another such mega-project is simply unacceptable.

I have strong concerns both with the proposal itself and the way it has been presented by the developer. This project represents a catastrophic loss of food-producing agricultural land – some 2,100 acres – which threatens both the livelihoods of local farmers – and by extension the local economy through unemployment and loss of access to land for non-farming purposes - and the UK's national food security. Vast amounts of livestock risk being displaced, with those which remain placed in close proximity to unfamiliar structures that present safety risks both to the animals and the structures themselves.

The existing local infrastructure, comprised primarily of unclassified roads, cannot support the vehicles needed for construction of this project. Villages with roads barely wide enough for vans and small goods vehicles to pass each other would not be able to cope with the estimated 40-50 lorry movements per day to/from the proposed site. Residential properties, many built on old foundations which evidence shows have already been damaged by HGV movements associated with existing mega-projects like High Speed 2 and East West Rail, would likely see more extensive damage as a direct result of excessive vibration. The extent to which such regular, heavy traffic would cause road surface deterioration is extremely concerning, and would present a long-term safety hazard to road users and pedestrians.



The developer has not been open with my constituents about the real-world impact and extent of land needed for this project. Representatives of the developer have not been able to answer basic questions from residents and businesses, in turn preventing them from accessing the information needed to submit their concerns as part of this very consultation. There have been inconsistencies in the limited information which has been presented by the developer to the community, leaving residents confused and worried.

In the following section, I break down my concerns into categories based on the real-world impact of this unwanted mega-project:

Loss of agricultural land

The backbone of Buckinghamshire's economy is agriculture, based on revenue generated from crop cultivation and livestock management. Ninety per cent of the land within the Buckingham constituency is agricultural, which carries both local and national importance. Many of my constituents are employed directly by agricultural businesses; any potential loss of agricultural land would have a huge impact on the livelihoods of my constituents and their families, a lot of whom generate their primary income from said land. The enormous extent of land that would be lost through Rosefield risks putting multiple family farms and other agricultural-focused firms out of business.

Moreover, another crucial use of land has been overlooked - that of tourism and leisure. The Claydons are a beacon for people visiting Buckinghamshire to enjoy our beautiful countryside, who then in turn support local B&Bs, hotels, cafes, pubs, restaurants and other businesses involved directly and indirectly with tourism. No one will want to visit to walk among solar panels, fenced off with ugly industrial metal fencing. The impact on the tourist economy would be significant. Likewise, businesses such as Hogshaw Farm, who also operate summer camps that rely on the very land under threat by the project. Hogshaw have determined that this land is safe and suitable for their activities; it is by no means guaranteed that an alternative equivalent space could be found without adding substantial costs for the business. It is simply unacceptable and wrong for the project's promoters to assume that such alternatives are readily available.

More broadly, any loss of agricultural land further erodes the UK's national food security, particularly when easily available alternatives exist for installing solar panels. Such solutions include using copious space offered by rooftops of both new and existing commercial and industrial buildings, a lot of which are available in and around the local area, including in the towns of Buckingham, Bicester, Brackley and Aylesbury, plus the city of Milton Keynes, all of which have easy access to the National Grid. This does not appear to have been considered by the project's promoters, which weakens the project's overall transparency.

Cumulative impact

This has been vastly overlooked by the promoters of the project, yet again demonstrating a severe lack of foresight and understanding of the local area. My constituents have suffered needlessly day in and day out for years with the cumulative impact of two railway construction projects and multiple housing developments; these communities have taken far more than their fair share of the burden for large-scale projects that will do nothing to benefit them.



The first of these impacts centres on the road network, or rather what is left of it after being severely damaged by near-constant HGVs travelling to and from nearby construction compounds. As has been made clear repeatedly by myself, parish councillors, unitary councillors and senior Buckinghamshire Council officers, the entire road network through this area is simply incapable of supporting such heavy, dense loads of the kind required for any type of construction.

There have repeatedly been instances of each of the existing projects, despite sharing the same roads and working in the same area, not communicating effectively with one another, which in turn risks delays to their respective programmes and thus prolongs the misery for my constituents further. Neither I nor the local highway authority have yet seen an impact assessment of the road network from Rosefield's construction; it is inconceivable that this project should go ahead without such an assessment.

The risk to all users of yet more damage to these roads are clear, damage that is inevitable with the size of vehicles and loads required for construction of a site on this scale. Existing defects would be severely worsened; potholes would grow larger and verges would deteriorate still further. Such defects already require users to veer into the path of oncoming traffic - traffic that now regularly includes HGVs and LGVs driven by reckless operatives. Worse still, most of these rural roads are typically unlit, heightening the risk, especially during long winter nights, of an accident occurring in a remote location. As far as I am concerned, there is simply no way to avoid or alleviate this if the project goes ahead.

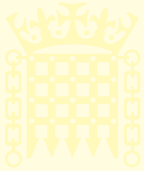
Furthermore, additional construction traffic would undo all the hard-won progress that we have achieved in getting these roads repaired. The road network is essential for residents to reach work, school and hospital safely; school buses are essential to the safe transportation of school-age pupils to and from the Claydons. The premise behind allocating significant resources to repairing these roads is that they would eventually be returned to normal use following the completion of East West Rail. The construction of Rosefield risks returning these roads to their impassable state that they're currently in, leaving my constituents without safe passage in to or out of the area.

These repairs have been a long-time coming for residents. The road network is essential for my constituents to reach work, school and hospital safely; school buses are essential for the safe transportation of school-age pupils to and from the Claydons, which have also been frequently and significantly disrupted without compensation by projects already operating in this area.

Nonsensical use of land

Whilst energy security is of growing concern, it should not be at the cost of food security as argued above. This argument comes into even sharper focus when other arguments for diversifying our energy mix are considered. Firstly, solar should only be installed on rooftops. A recent report by the well respected CPRE charity shows that installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW in England by 2035. By 2050 there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces. Rooftops should be prioritised over agricultural land and our countryside.

Furthermore, 2,000 acres of solar panels only generate enough electricity to power – at current usage – around 50,000 homes. Whereas Small Modular Reactors (SMRs), such as those developed by



Rolls Royce, require just two football pitches of land in total and can generate electricity to power – at current usage – around one million homes. It is a nonsense to prioritise ground mounted solar over SMR technology, which needs so much less space and therefore would not challenge food production or an areas natural beauty.

Lack of compensation

Through my conversations with affected landowners and farmers, it is clear that the project's promoters are unwilling to offer any compensation despite the clear economic impact that Rosefield would have on this area, unlike other large infrastructure projects operating in the Claydons. This is an unacceptable position in which to leave my constituents, many of whom have their livelihoods tied up in the use of land for both agricultural purposes and otherwise.

This is despite the substantial resourcing that lies behind EDF Renewables' support for Rosefield, which due its enormous size is considered a nationally significant infrastructure project. This has not been lost among my constituents; the combination of not benefitting from the end product and not being compensated for the misery of construction and potentially devastating loss of income in the process has generated strong ill feeling within the communities affected.

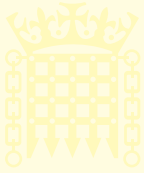
I've been told that one farming family, the Claridges based in Botolph Claydon, will be left with just two fields arable land on which to graze livestock, compared to over 100 under the family's current ownership. Another local farmer, Mark Fowler, will be left with no arable land and therefore no income if this project goes ahead in its current form. Put simply, Mr Fowler would be left unable to afford his home. Again, totally unacceptable.

Poor consultation exercise

Rosefield's promoters have conducted an extremely poor consultation exercise, which reflects the project's weak basis for pursuing what is clearly an ill-thought-out scheme that has no place within such a rural area. Three of five public drop-in events were held during times unsuitable for working families, potentially excluding a substantial number of my constituents. Inconsistencies between events where junior members of staff gave contradictory answers to my constituents' questions is also very concerning, especially when referencing key figures associated with the project, including the acreage of land required for the project.

Indeed, beyond the drop-in events, the initial pieces of literature distributed by the project's promoters were misleading. A figure of approximately 600 acres was first touted, though it later transpired that the true figure is closer to 2,100 acres of land that is needed for the project. That is a shockingly large difference that is extremely frustrating for the whole community, but especially so for those farms that at this stage simply do not know how much land they could potentially be losing in total over the course of the project's life.

This speaks to the fundamentally flawed approach in the targeting of rural land by infrastructure projects of this size - the promoters simply have no understanding of how rural businesses function or how to communicate with them. The lack of clarity over something as simple as the amount of land required



has created so much uncertainty that farmers and landowners simply cannot plan ahead and make the investments needed to keep their businesses profitable. This has the added effect of increasing distrust and resistance towards the project not just from farmers and landowners but from the community as a whole, given the role of farms as anchor businesses for the local economy.

Likewise, there appears to have been very little representation from EDF Renewables at any of the drop-in events, including two that I personally attended. This further weakens accountability of this project, leaving residents and businesses confused about whom to go to for answers to the aforementioned basic questions that staff on hand simply cannot answer in an accurate and consistent way.

This was why I stepped in to chair a public meeting alongside affected parish councils, which was much more well-attended than any of the promoters' drop-in events. I felt there was a lack of clarity and honesty from the promoters both before and during my meeting; there was little if any awareness of how Rosefield would add to the already severe cumulative impact from multiple large construction projects in this area, as well as of how exactly the area has already been impacted.

Ecological impact

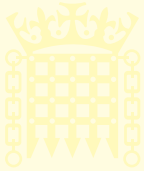
Further to the point of outright unsuitability in this environment, solar panels on the scale demonstrated by the project's promoters would present a significant health and safety risk to livestock which currently graze on land required for Rosefield. Horses and cattle in fields adjacent to those occupied by solar panels risk being spooked in low-light conditions; the resulting panic could cause severe injury to the animals and damage to the solar panels, as well as property damage to fences and gates and the subsequent risk to road users should they reach the highway.

Through my conversations with local farmers, it also appears that the project has not conducted accurate or valid wildlife surveys in the area. Bats are known to roost in woodland surrounding the Claydons; these include protected species that are dependent on said woodlands for safe migratory passage. Further conversations with the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, which manages Finemere Wood just south of the Claydons, do not suggest that the project's promoters have reached out in the way that I and the community would expect, again demonstrating the promoters' ignorance of this rural environment.

The Claydons are known for the likely presence of great crested newts as well as the presence of bats, red kites, foxes, deer and other birds of prey. Developing the large areas of green field space will displace and significantly reduce the amount and variety of wildlife in the locality and this is unacceptable. Even if the majority of the wildlife habitat remains intact, the movement of vehicles passing right past these areas over a 2-3 year period is bound to have a significant and detrimental impact on local wildlife, as is the proposed fencing on deer movements.

Visual impact

Another factor overlooked by the project's promoters is the true extent of the visual impact of such a vast collection of solar panels. The project's promoters have repeatedly claimed both during their drop-in



events and in conversations with affected farmers and landowners that the panels will be hidden from view. This is an incredibly short-sighted assumption, given the surrounding topography. The panels would be easily visible from villages further afield, such as Waddesdon and Quainton. On clear days with bright sunshine, the panels' reflection would blight the landscape even further. Far from the project's promoters' naive approach to this problem, the blight extends well beyond the Claydons - as is the case with every other major infrastructure project that has so far blighted this area.

I am therefore concerned that the project's promoters have not acknowledged this fact in the material distributed to my constituents and in the conversations they've had with the wider community.

Manufacture of PVCs using forced labour

It is also widely known in the industry, through evidence-based reports, that the prefabricated construction of solar panels is facilitated through highly questionable and poorly regulated employment practices. This includes slave labour in the Xinjiang region of China, where the local Uyghur population is subjected to inhumane working conditions and little to no pay.

This reality has been documented thoroughly by the Helena Kennedy Centre at Sheffield Hallam University; several large PVC manufacturers have employed forced labour in this way. It would be unacceptable on principle to have any solar development based on such appalling practices.

Lack of clarity over future expansion plans

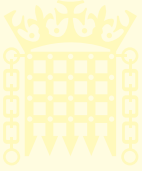
Equally obscured from Rosefield's material is the clear potential both for expansion and later decommissioning of the site. Given current and future demand for electricity nationally, it is clear to me and to my constituents that there is potential for expansion of the site across its predicted 40-year lifespan.

Inconsistency with local planning frameworks

Whilst I am fully aware this proposal, if progressed, will not be determined by the local planning authority, I would respectfully point out that its scope and scale massively undermines the locally set planning policies, which carry a democratic mandate.

These proposals would contravene Buckinghamshire Council Planning Policies specifically:

- (BE3) that states that planning permission will not be granted where the proposed development would unreasonably harm any aspect of the amenity of nearby residents when considered against the benefits arising from the proposal.
- (S3) that states that new development in the countryside should avoid reducing open land that contributes to the form and character of rural settlements and the Council will have regards to maintaining the individual identities of villages.



- (NE4) that states that Development proposals in these areas should respect their landscape character. Development that adversely affects this character will not be permitted, unless appropriate mitigation measures can be secured.
- (BE2) that states that proposals for the extension of residential and other developed curtilages beyond the built-up area of settlements that would adversely affect the character and appearance of Rural Areas will be resisted.

In conclusion I am totally opposed to Rosefield Solar 'Farm' and urge the promoters to withdraw the proposal completely. This is a matter of simple fairness to communities who do not deserve yet more industrial scale construction and loss of beauty and character to their area.

Yours sincerely,

A handwritten signature in blue ink that reads "Greg Smith".

Greg Smith MP
Member of Parliament for Buckingham