



HOUSE OF COMMONS
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Wednesday 31st January 2024

Dear Zenab,

Statera – Planning application – Objection letter – Reference 23/03875/APP

I write as the Member of Parliament for the Buckingham constituency, which covers this application, to formally object to the Planning Application by Statera reference 23/03875/APP, on the following grounds:

Cumulative Impact

This area has seen a huge increase in construction activity over the past few years, which has had a devastating impact on the local infrastructure and the wider community.

This has taken the form of large-scale major projects, including High Speed Two and East West Rail, as well as various housing developments in and around the surrounding villages. The impact on residents and businesses comes directly from the presence and movement of construction activities, above all heavy goods vehicles - none of which are suited to travelling on single-track roads through and between villages where property foundations have been damaged by excessive vibration as a direct result of near-constant HGV movements which often include fully-laden commercial tipper trucks.

It is therefore concerning that with yet another major infrastructure project in the form of Statera's battery plant residents and businesses would face yet more disruptive HGV movements for an extended period of time. Even upon the completion of construction work the damage done to the surrounding roads would last far longer and would present an unjust burden on the council taxpayer to foot the repair bill. My constituents have been kept waiting for an unacceptably long time for this exact network of roads to be



repaired following East West Rail's construction over the last four years. The safety of road users has been put at risk in the process and my constituents would consider it unacceptable for yet more damage to be inflicted by the battery plant's construction.

Connection with Rosefield Solar Farm

It has become wholly apparent to myself and my constituents in this area that both Statera's battery plant proposal and the much larger Rosefield solar development proposal, which are situated adjacent to each other, represent the same threat to the surrounding community and therefore cannot be seen in isolation from one another.

Both developments constitute acquiring large amounts of agricultural land for use as energy infrastructure, neither of which will in any way benefit the local community.

Despite being subject to separate planning applications it is very apparent how these two developments will compliment and in some ways require each other to function. One such example is the fact that both require connections to the national grid network, which appears to be among the strongest contributing factors for both projects. This ignores the destructive combined cost of both projects to the local community through visual blight and noise and light pollution, especially during construction.

Unsuitability for rural setting

As I have already outlined, the nature and extent of this site are not in keeping with the surrounding environment. This is partly due to the type of infrastructure, or lack thereof, found in this area. However, above all this is a farming community and the type of development in question would disrupt the operation of surrounding farms and other businesses in this area.

This is a vast proposal to be located in several agricultural fields located between existing villages. This open countryside is a very important part of the north bucks landscape, and consists of agricultural land providing an important country side buffer between settlements. The battery proposals will urbanise this agricultural area, blighting the visual amenity for nearby residents and walkers with the industrialised nature of the units, the substation equipment and containerised support accommodation makes no effort to address this rural location. There are 888 full sized containers and 74 half sided containers would give the impression of a huge truck depot in the middle of the countryside.

Noise and light pollution associated with both its construction and future operation risk affecting farm animals grazing in surrounding fields, especially during winter months when this type of pollution is prolonged. The construction of both East West Rail and HS2 has already had this effect, with neighbouring farms suffering immensely from the impact of construction. Furthermore, there is a risk that waste material from the development's construction could leech into either the soil or water supply. This has already been the case with HS2, with both the Padbury Brook and at least one farm nearby having experienced various forms of contamination, in turn risking the health of farm animals and the local ecosystem as a whole. I have yet to hear from the developers as to how they propose to mitigate and prevent similar such risks during the construction phase.



Moreover, the visual blight would impact properties beyond the site's immediate surroundings. The village of East Claydon, where the Parish Council was bizarrely was not the first to be contacted by Statera, would be most impacted in this regard. East Claydon is situated higher in elevation than the proposed site; it was not until during a visit I arranged with Statera and two local councillors that this fact became known to the promoters. This demonstrates not only a severely ignorant approach by the promoters to the project's real-world impact, but also of their communications strategy more generally - which again reflects a similar attitude attributable to Rosefield's promoters.

To compound the visual impact, the lack of any architectural consideration is very regrettable, and the lack of acknowledgment of the topography, highlighted by the lack of engagement with East Claydon parish council demonstrates a complete lack of design intent or willingness to meaningfully engage with the local community.

As per the updated NPPF paragraph 181, and footnote 62, the need to consider the impact on food production is essential. The applicant emits the loss would be long term, and the number of fields that would have well over 5,000 concrete foundations is difficult and expensive to undo, and a s106 would be needed to ensure the applicant is legally obliged to remove the physical infrastructure to return the site to agriculture.

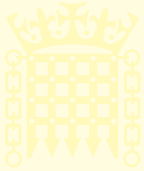
The late submission from the applicant acknowledges these recent changes to the NPPF which now recognises productive agricultural land and the need for food security but the applicant does not offer any mitigations and it is indisputable that this large proposal will impact local farming capacity.

Impact on local road network

In addition to my previous comments, the impact on the local road network from construction would be too much in itself for my constituents to bear. I have made clear the safety risk from HGVs delivering materials to construction sites; this extends to HGVs and LGVs leaving as well, specifically the risk of mud and dust emanating from these vehicles.

This issue has occurred repeatedly and without adequate measures to prevent it. The risk to other road users is clear, yet those projects already operating in this area have done little to prevent large amounts of mud from being distributed across our local road network. Moreover, despite the use of street sweepers there is often too much mud being distributed too often for this to work, in turn prolonging the risk and subduing the urgency for any one project to deal with the issue as it often cannot be attributed to just one project. There is nothing to suggest that Statera's construction site would be any different in this regard, given its size and scope.

This development would also exacerbate existing pressures on local water courses and would likely worsen the impact of flooding. During periods of heavy rainfall this area often experiences severe flooding which the site's impermeable surface area would worsen through increased runoff into nearby fields and watercourses, in turn heightening the risk of severe flooding for nearby farms and properties. This would also limit access for emergency services reaching the site by road.



Risk of fire

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.

The response from fire crews would be hampered by the single-track roads that surround the permitter 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.

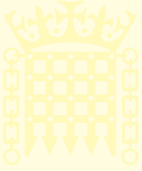
Indeed, even with the proposed second temporary access point from East Claydon Road during the construction phase fire crews would still have to negotiate a narrow crossing over a perimeter stream to reach any faulty equipment, thus further slowing the response time and associated risk of the fire worsening. 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.

Contribution to Greenhouse Gas Emissions

The applicant estimates that production of materials plus construction and replacement of the batteries over a period of 40 years will generate up to 1,083,320 tonnes of CO₂. By contrast, it is impossible to know definitely what if any savings are achievable during operations, varying from positive to negative. Therefore the scheme cannot be considered to be a major contributor to net zero regardless of its size and scope. Indeed, in the short to medium term it will cause an increase in greenhouse gas emissions due to the fact that all material, equipment and personnel required for both construction and operation of the site must arrive by road. The round-trip efficiency rating of 85 per cent means that huge quantities of energy will be lost as waste heat during operation.

Furthermore, the applicant's calculations do not account for emissions associated with the shipping and



import of key component parts from overseas sources, including from China where such components receive far less scrutiny from a safety perspective.

Yours sincerely,

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

Greg Smith MP
Member of Parliament for Buckingham