

Crimscode Solar Farm

Should we be concerned?

Regener8 SPV1 Limited has applied for permission to build a substantial solar farm and battery storage facility on 147 acres of productive agricultural land outside Crimscode, CV37 8UF. Should we be concerned?

The need for clean electricity is undeniable, but it isn't the only issue that is vital to our country, our natural environment and to the future we create now for our children. The question that many communities are asking is: to what extent are we willing to allow opportunistic developers to build solar power stations where it is most profitable for them, when there are so many less damaging sites that could provide equally green energy?

“Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high quality land. Protecting the global environment is not an excuse to trash the local environment.”
Former Secretary of State for Communities and Local Government, Lord Pickles ⁽¹⁾

This document fact-checks the claims and provides a balanced counterpoint to help you decide.

Questions to consider

Right People?	Can we trust the developers to deliver the environmental mitigation they promise and to ensure the screening trees and hedges become established?
Right Place?	With up to 80% of our food imported at significant environmental cost, is it responsible to remove another 147 acres of productive land from agriculture?
Right Landscape?	There are already several solar farms across our local landscape. Is now the time to begin protecting our countryside from developments that could be equally effective in much less damaging locations?
Right Impact?	Should we accept 2,792 diesel HGV journeys through our villages peaking at ?

Have your opinion heard – deadline August 20th

If you would like to join the discussion and be amongst the first to receive new information as it becomes available, follow [Crimscode Solar Farm – Facts Check](#) on Facebook.

If you feel that planning for the current proposals should be refused, please read the section at the end of this document on how to object. To carry weight, objections must be aligned with the relatively small number of reasons that will influence the planning officers and must be submitted by August 20th. See the end of this documents to find out how to receive a guide letter written by a planning consultant.

Regener8 Power and Regener8 SPV 1

Claim: Regener8 Power began the consultation (24/03/21) with a slide describing themselves as “an experienced cleantech company with a focus on renewable energy and land regeneration.”

Claim: The senior representative of the developer stated: “Regener8 Power; we have been developing solar for a long time, we started development ten years ago in the UK.”

Truth: Regener8 Power was registered as a business on December 10th 2018. By the end of 2019 they had accumulated net current assets of £1,856. They have not developed any solar installations.

Claim: Regener8 Power’s website uses these graphics to illustrate their track record:

Truth: Regener8 Power has not completed any commercial solar installations or generated any electricity.



Claim: When challenged on these statements, Regener8 Power changed its emphasis to: ‘Our team has more than 50 years combined experience in origination, financing and construction of projects within the clean energy sector.’ To validate this claim, they provided the names of solar farms where their people are said to have performed senior delivery roles.

Truth: When asked what these senior delivery roles were, Regener8 Power replied, ‘This is not a material consideration for planning’ and refused to provide an indication of relevant job titles or responsibilities.

UPDATE: While the consultation was held by Regener8 Power, whose branding continues to appear on the unchanged Crimscore Solar website, the planning application has been made by Regener8 SPV1 Limited, one of three Regener8 SPV companies (1,2 and 3) registered in January 2021 for the ‘generation of electricity.’ This structure is usually chosen so that each site can be developed then sold as a standalone business.

Can the UK justify building on agricultural land?

An increasing number of specialists believe that agricultural land is far too precious to be used for anything other than food production, particularly at a time when the world population is growing and both regional and global trade are increasingly stressed.

The NFU says the UK imports around 40% of its food, with “a steady decline in our self-sufficiency.”⁽²⁾ Many believe that even this percentage is too low, for as HSBC analyst David McCarthy points out, it defines food that is processed in the UK as UK food, “even though the ingredients may have been imported.” McCarthy says that when ingredients are included, the real proportion of imported food “is over 80%.”⁽³⁾ Are we happy that 80% of our food is imported?

As well as negatively impacting UK food security and countryside employment, importing 80% of our food has a significant impact on air quality and pollution. According to the UK Government’s National Statistics Office, 26% of food imports come from the EU,⁽⁴⁾ brought to us by hundreds of diesel trucks every day. Trucks carrying freight generate 29.4% of road vehicle emissions.⁽⁵⁾

The majority of the rest is imported by ships. According to a specialist interviewed by *inews*, “shipping is the world’s worst polluter.”⁽⁶⁾ The article shares commonly reproduced figures, stating that just one large container ship can produce the same amount of pollution as 50 million cars.

The 147 acres of agricultural land that will be repurposed for the Crimscore Solar Farm has traditionally been a mix of arable and sheep. The National Statistics Office reports that we already import £4.2 billion of cereals and £6.6 billion of meat every year.⁽⁴⁾

Claim: Regener8 SPV1 states that the agricultural land on which the solar powerstation will be built is grade 3B.

Truth: Amongst the crops grown on this land is oil seed rape, a crop that the government states is only suitable for high-grade agricultural land. This is an important point in the decision to grant or refuse planning permission.

Does electricity generation have to be close to consumption?

Electricity fed into the high voltage National Grid supports consumption at any location nationwide. Many specialists believe there is more than sufficient brown field land for the solar farms that the UK needs. Many also suggest that new housing and industrial developments should be required to provide on-roof solar energy generation. In Europe, many supermarkets, shopping centres and light industrial parks are generating clean solar electricity through panels fitted to factory and office roofs and to carpark canopies that also provide weather protection.



What will the Crimscore Solar Farm look like?

Regener8 Power claimed Crucis Solar Farm as an example of recent projects in which their people have held senior delivery roles (see section above). This is the illustration from their PR company's portfolio page on Crucis Solar Farm, a site that, at 75 acres, is around half the size of the proposed installation at Crimscore.

The page proudly states that planning permission was achieved despite the site being 'in the middle of the Cotswolds, in a picturesque village, bordered by an Area of Outstanding Natural Beauty and had a Roman Road running through the adjoining field.'⁽⁷⁾



The installation at Blackwell (clearly visible from Ilmington Hill) is less than a third the size of the proposed Crimscore development.

What are 'Battery Container Units'?



In addition to the solar panels, the application includes six battery container units. These are to store electricity that balances supply when there is less (or no) sun. According to *The Financial Times* (03-08-2021), a recent fire at a similar installation "has drawn fresh attention to the risks of batteries used to store renewable energy for electricity grids." The paper reported that it took three days to extinguish the blaze. Earlier in the year, a similar fire required 235 firefighters to control while an installation in Liverpool caught fire in the middle of the night. In 2019, a lithium battery explosion threw a firefighter more than 20 metres.

Impact on natural habitats and the landscape

Claim: During the consultation, Regener8 Power stated that an ethos of their business is "combining energy development with the vocations of the land" and that "local ecological enhancement" would be "embedded within the fabric of the site."

Truth: In answers to questions, Regener8 Power admitted that solar panels will be installed up to the boundary of the site (shown in red on its maps). This leaves no space free for local ecological enhancement "embedded within the fabric of the site."

Claim: "It allows farmland a break from intense farming, which will allow it to replenish its nutrients ..."

Truth: Rotating a range of crops and animals keeps this land healthy. It does not need to rest for the planned 40 years.

Claim: In the consultation, the developer's ecology consultant admitted that one of the main losses in biodiversity will be habitats for birds. To partially compensate for this, an area of "farmland bird mitigation" is proposed on "50 acres outside on adjacent land farmed sympathetically."

Truth: 50 acres sounds impressive but, when pressed, the ecology consultant admitted that this actually means leaving one 4m x 4m plot of land untilled per half hectare: less than one tiny untilled island per acre of worked farmland. This farmland is not owned or controlled by the developer and the land owner has provided no reassurances that this will be delivered.

Claim: The developer states that screening will be provided by a mix of new hedges and trees chosen from native species. They say these "will require very little maintenance."

Truth: The ecology consultant stated that they plan to plant “bare root and whip plants that are really quite small” and will “grow 40cm a year, depending on location and weather.” The developer has not provided an answer to who will maintain the environmental mitigation, most of which is outside their proposed boundary, even during the critical establishment period.

Claim: The view from the Cotswolds Area of Outstanding Natural Beauty will be mitigated by a new hedge along the south side.

Truth: This view is largely from the hills above Ilmington, looking down onto the 147 acre site. A hedge – even when it is fully grown - will make very little difference to the site’s impact on this and other views from above.

Claim: Their consultation document states, “... the site can still be used for grazing.”

Truth: There will be very little space around the panels, which they say will extend to the site boundary. On their website, this boundary is described as a 2m high “deer fence.” In the consultation, the ecology consultant admitted that the actual “intention is that the fencing will be a 3m security fence.” This will be particularly prominent from the Crimscote road.

Claim: The planning authority will enforce the successful completion of the environmental activities and their ongoing maintenance during the establishment period.

Truth: Many similar promises made by the developers of other solar sites in the area have not been delivered. The planning authority rarely enforces this type of condition, especially where the environmental mitigation is on land owned by another business, unrelated to the one that received the planning consent.

How disruptive will construction be?

Claim: During the consultation, the developer predicted ‘one lorry per hour’ through our villages.

Truth: The developer’s consultant has calculated that construction will require ‘approximately 11,268 two-way vehicle movements,’ over an estimated six month construction period. As these are two-way, that’s 22,536 vehicle journeys. The same document calculates vehicle movements assuming 26 working days each month, ie a six day week. This gives an average additional vehicle flow due to construction of 144 vehicle journeys every day, including Saturdays.

While the majority of these vehicle movements will be construction employees commuting to the site, the developer’s consultant (table 4.3.9 of the Transport Statement) has calculated that 2,792 deliveries will be made by HGV, giving a total of 5,584 HGV journeys. In the first three months, they anticipate a minimum of 2,340 deliveries by HGV, equivalent to 4,680 HGV journeys (ie there and back): not one lorry per hour, but an astonishing 7.5 HGV journeys through our villages every hour, six days a week.

The proposed routes take site vehicles and HGV deliveries through Halford, Newbold on Stour, Alderminster and Wimpstone, or Darlingscott, Blackwell and Ilmington. No contribution to road maintenance has been proposed.

How to have your concerns heard

If you feel that planning for the proposals in their current form should be refused, please ask each adult in your household, as well as family and friends, to write separately to planning.applications@stratford-dc.gov.uk regarding planning application 21/02017/FUL ‘Erection of a ground mounted solar farm, land at Crimscote, Wimpstone,’ and cc your our local MP, Nadhim Zahawi: constituents@zahawi.com. Please clearly state your reasons for objecting to the proposal. The most powerful objections reference social, economic and and environmental concerns and in particular, the visual impact on the landscape.

If you would like to join the discussion and be amongst the first to receive new information as it becomes available, follow [Crimscote Solar Farm – Facts Check](#) on Facebook where you will soon find a guide letter written by a planning consultant.

This document has been created by a group of local residents. You can contact us with your thoughts, or to request a copy of the sample letter, at CSFFactsCheck@protonmail.com. Thank you for your time, we look forward to hearing from you.

1. <https://www.gov.uk/government/speeches/planning-update-march-2015> (1)
2. <https://www.nfuonline.com/back-british-farming/campaign-news/the-importance-of-british-food-and-farming-standar-606337/> (2)
3. <https://www.businessinsider.com/no-deal-brexite-percentage-british-food-imported-shortages-2019-1?r=US&IR=T#:~:text=In%20reality%2C%20%2280%25%20of%20food%20is%20imported%20into,as%20imported%2C%20the%20real%20figure%20is%20over%2080%25.%22> (3)
4. <https://www.gov.uk/government/statistics/food-statistics-pocketbook/food-statistics-in-your-pocket-global-and-uk-supply> (4)
5. <https://ourworldindata.org/co2-emissions-from-transport#:~:text=The%20other%2029.4%25%20comes%20from%20trucks%20carrying%20freight,accounts%20for%2015%25%20of%20total%20CO%20%20emissions.> (5)
6. <https://inews.co.uk/news/long-reads/cargo-container-shipping-carbon-pollution-114721> (6)
7. http://www.quantumpr.co.uk/casestudy/crucis_park.pdf (7)