Rosefield Solar Farm

Consultation Report
Appendices J-1 to J-2

EN010158/APP/5.2
September 2025
Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009

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Appendix J-1: Summary of Section 42(1)(a)(b) and (d) responses and consideration by topic[1]

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Theme	Consultee	Summary of comment	Applicant's response	Change (Y/N)
Air quality				
Air Quality Assessment	Buckinghamshire Council	Comment that it is considered likely that an air quality assessment would be required for the construction period.	An Air Quality Assessment has been prepared and accompanies the Application (**ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4]**). The assessment demonstrates that with the implementation of additional mitigation measures, the Proposed Development is not expected to have any significant human health impacts arising from effects on air quality during the construction phase (or at any other point during the lifetime of the Proposed Development).	N

[1] Abbreviations and defined terms are included within **ES Volume 1, Chapter 00: Glossary [EN010158/APP/6.1]**
[2] Comments shaded blue were also made by s47 respondents.

Assessment of human health	Buckinghamshire Council	Comments on the approach to assessing human health impacts in the air quality assessment including that it is very high level, does not reference IEMA 2022 guidance, and is not supported by consultation with stakeholders.	The potential for human health effects arising from the Proposed Development has been considered and assessed as part of the **Air Quality Assessment** (**ES Volume 4, Appendix 6.1 [EN010158/APP/6.4]**). This assessment has been prepared in accordance with best practice and relevant IAQM guidance rather than the IEMA 2022 guidance (as agreed with Buckinghamshire Council through email consultation on the air quality assessment approach in May 2024). The level of detail of the assessment is consistent with standard practice and other approved DCO projects. The approach of assessing dust effects on human health with reference to the IAQM guidance is considered within standard practice. The assessment demonstrates that with the implementation of additional mitigation measures, the Proposed Development is not expected to have any significant human health impacts arising from effects on air quality at any point during its lifetime. The Applicant has produced a **Health and Wellbeing Summary Statement [EN010158/APP/5.5]** which draws together	N

			relevant chapters of the **Environmental Statement [EN01058/APP/6.1-6.4]** and summarises how human health and wellbeing has been considered and assessed.	
Baseline	Buckinghamshire Council	Comment that no surveys have been undertaken to inform existing air quality conditions and the Applicant has used publicly available data. Specific reference made to the need to verify the results of the chosen dispersion model.	The Applicant has used publicly available local air quality monitoring data – such as the Air Quality Annual Status Report published by Buckinghamshire Council – to inform the baseline characterisation. Such approach is considered within standard practice to establish baseline air quality. Proposed air quality assessment methodology was sent to Buckinghamshire Council in May 2024. An email response was received from Buckinghamshire Council in May 2025 stating acceptance of the suggested assessment approach. No further survey work, including dispersion road modelling, was considered necessary as the Proposed Development is not predicted to exceed the DMRB LA 105 Air Quality screening criteria during the construction phase.	N
Impact on local area	East Claydon Parish Council	Comment expressing concerns over the potential for increase in airborne particulates during construction (e.g.	Potential effects from dust emissions arising from construction and decommissioning activities have been	N

		during workings on clay soils in dry conditions during construction work). Specific reference made to the operations of TCS Biosciences Ltd.	assessed with reference to Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction. The results of this assessment are included in the **Air Quality Assessment (ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4]**). The assessment demonstrates that, with the implementation of additional mitigation measures, for example, the erection of barriers around dust activities or the Order Limits and using suppression around sites or specific operations, the Proposed Development is not expected to have any significant human health impacts arising from effects on air quality. This includes in relation to the operation of local businesses, such as TCS Biosciences Ltd.	
Alternatives				
Grid connection	Steeple Claydon Parish Council	Comment that there is insufficient evidence to demonstrate that other points of connection into the National Grid are not appropriate.	Paragraphs 2.10.23 – 2.10.25 of NPS EN-3 establish that the starting point for the site selection process can be determined by the availability of a nearby and suitable connection to transmission network, and that is a standard and accepted approach for most, if not all, solar DCOs that have	N

			been granted to date. The Applicant secured a grid connection agreement at National Grid East Claydon Substation, where there was capacity for a new renewable energy project to connect, as set out within the **Grid Connection Statement [EN010158/APP/7.1]**.	
Location	East Claydon Parish Council Edgcott Parish Council Preston Bissett Parish Council	Comment that there are more suitable locations for and scales of solar development, including rooftops, smaller ground-mounted solar farms, brownfield land and poorer quality land.	To meet national targets for energy, current policy calls for a variety of renewable energy sources including rooftop installations and smaller ground-mounted solar farms. On their own, however, these would not produce enough energy to meet future energy needs. Large scale solar is needed to generate significant capacity. The Applicant has considered the availability of brownfield and similar land in identifying the Site. This is covered in the Site Selection Assessment. See **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7]**) for more information.	N
Technologies		Statement of support for other forms of energy generation, including wind, nuclear, tidal.	The current national policy calls for a mix of renewable energy sources in order to meet future energy demands. The starting point for the Proposed Development was the grid connection at East Claydon, and	N

			then the Applicant sought nearby land that would be suitable. This area is suitable for solar production, which is why solar is being pursued. A summary of the alternative energy generation technologies that were considered is provided within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** and the **Planning Statement [EN010158/APP/5.7]**.	
Approach to EIA				
Validity of the PEIR	East Claydon Parish Council Granborough Parish Council Steeple Claydon Parish Council	Comment that the amount of optionality in the design (e.g. inverters, BoSS, BESS, Substation) prevents assessment of and comment on the potential effects of the Proposed Development and its overall acceptability. Specific reference made to the location of the Rosefield Substation in terms of understanding visual impact and efficacy of screening. Other comments felt that the optionality within the PEIR deferred local engagement until the examination.	The **PEIR** (**Appendix I-1** of the **Consultation Report [EN010158/APP/5.2]**) provided a preliminary assessment accounting for the information available at the time of assessment. It also set out the further work required to inform the contents of the Environmental Statement. Where optionality of project elements existed, the PEIR assessed a reasonable worst-case location of each aspect of the design for each environmental factor assessment to allow consultees to understand and comment on the potential worst case effects of the Proposed Development.	Y

	Following Phase Two Consultation, the proposed locations of the BESS, Collector Compounds and Rosefield Substation were each narrowed down to single siting zones. Therefore, the Application has provided greater certainty regarding the proposed location of these elements and the visual impact and efficacy of screening. The **Environmental Statement [EN01058/APP/6.1-6.4]** is based on this proposed layout including any associated green and blue infrastructure which includes landscape mitigation planting. Moreover, the locations of Rosefield Substation, BESS and Main Collector Compound were the subject of Targeted Consultation between 21 May – 16 July 2025. This included the publication of an Addendum to the PEIR confirming the likely environmental effects arising from the proposed location of these elements compared to those identified in the PEIR (see **Chapter 7** of the **Consultation Report [EN010158/APP/5.1]**). This addendum provided an assessment of the optionality of the Rosefield Substation, BESS and Main Collector Compound and assessed a reasonable worst-case location for each environmental factor assessment

			to allow consultees to understand and comment on the potential worst case effects of the Proposed Development The identified consultees were consulted as part of the Phase One, Phase Two and Targeted Consultation. Should the Application be accepted for examination, interested parties would have the opportunity to consider and make comments on this as part of the examination process.	
Cumulative developments	East Claydon Parish Council	Comment that supporting figures should show cumulative developments.	An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. This is accompanied by **Figures 17.1** to **17.8 (ES, Volume 3, Figures 17.1** to **17.8 [EN010158/APP/6.3]** which show the location of cumulative developments that have been assessed.	N
Rochdale Envelope	East Claydon Parish Council	Comment that the use of the Rochdale Envelope adds to the uncertainty of the Proposed Development and limits comment.	The approach to the assessment is set out in **ES Volume 1, Chapter 5: Approach to EIA [EN010158/APP/6.1]**. It is necessary to maintain a degree of flexibility in the layout of the Proposed Development to account for technological advancements.	N

			This is a standard approach for Development Consent Orders to allow flexibility at the detailed design stage due to the timescales between the submission of the application and construction. The Rochdale Envelope approach ensures that the reasonable 'worst-case scenario' has been assessed in the **Environmental Statement [EN010158/APP/6.1 to 6.4]** by assessing the development on a maximum parameters' basis.	
Validity of the PEIR	Steeple Claydon Parish Council	Comment that the biodiversity chapter of the PEIR states that more survey work needs to be done but still concludes that there would be no significant negative effects on a number of species.	It is noted that the PEIR (**Appendix I-1** of the **Consultation Report [EN010158/APP/5.2]**) was intended to provide a preliminary assessment accounting for the information available at the time of the assessment. It also set out the further work that was required to inform the content of the Environmental Statement, with additional surveys undertaken since the PEIR assessment which are detailed within the ES. At each stage, the assessment to determine levels of significance was undertaken in accordance with CIEEM best practice guidance for ecological impact assessment. Assessments also had regard to embedded and additional mitigation	N

			measures incorporated into the design of the Proposed Development to reduce impacts to ecological receptors. Further survey work has been undertaken following the publication of the PEIR, which are outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The Applicant has outlined the likely significant effects on biodiversity arising from the Proposed Development within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and the effects are not considered to be any worse than that consulted on during the Phase Two Consultation.	
Battery storage				
Engagement	Buckinghamshire Council, Buckinghamshire Fire and Rescue Services	Comment that the Applicant should engage with Buckinghamshire Fire and Rescue Services to develop the oBSMP.	The Applicant has held meetings and engaged with Buckinghamshire Fire and Rescue Service throughout the pre-application period (see **Consultation Report [EN010158/APP/5.1]** and **Draft Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.17]**). This has included sharing the draft version of the **Outline Battery Safety Management Plan [EN010158/APP/7.9]**	N

			with Buckinghamshire and Milton Keynes Fire Authority (BMKFA) which is also representing Buckinghamshire Fire and Rescue Service. The Applicant will continue to engage with the BMKFA throughout the examination and over the lifetime of the project.	
Emergency Response Plan	Buckinghamshire Fire and Rescue Services	Comment that the Applicant should engage with Bucks Fire and Rescue Services to develop its Emergency Response Plan.	In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with Buckinghamshire Fire and Rescue Services, setting out how they would respond to any BESS event.	
Guidance	Buckinghamshire Fire and Rescue Services	Comment that the Applicant should adhere to NFCC guidance.	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance “Grid Scale Battery Energy Storage System planning – Guidance for FRS” and NFPA (National Fire Protection Association) 855 “Standard for the Installation of Stationary Energy Storage Systems.” For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline Battery Safety Management Plan [EN010158/APP/7.9]**.	N

Safety	East Claydon Parish Council Edgcott Parish Council Preston Bissett Parish Council Steeple Claydon Parish Council	Comments that there would be a high fire safety risk from the BESS. Specific comments state that the location has difficult road access for emergency services which would burn out. Other comments that the management of a BESS fire and associated pollution is insufficiently described and addressed.	The Applicant has designed the BESS in line with industry best practice, applicable guidance and ongoing dialogue with stakeholders such as the UK Health Security Agency and Buckinghamshire and Milton Keynes Fire Authority. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6]**) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **BESS Plume Assessment [EN010158/APP/7.13]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in, such an event,	N

this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm).

A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is once every 344 years. The **BESS Plume Assessment [EN010158/APP/7.13]** has demonstrated that the risk to the population remains **very low.**

The overriding approach to manage issues around firefighting water is to avoid the risks. This is through identification and assessment of the risks and consequences, followed by tailoring the mitigation to capture, contain, test and appropriately dispose of any surface water runoff, fully aligning to UK regulations for firefighting water runoff. This therefore stops a pathway linking the potential source of contamination and receptor.

Along with the **Outline Battery Safety Management Plan [EN010158/APP/7.9]**, the **Outline Drainage Strategy [EN010158/APP/7.11]** sets out methods to collect, contain and manage any

			firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with Buckinghamshire Fire and Rescue Services, setting out how they would respond to any BESS event.	
Biodiversity				
Baseline – badger	Buckinghamshire Council	Comment that the baseline data for badger is inadequate, including that surveys should cover all land within the Order Limits, and suggestions for different types of surveys to identify badger activity.	Following Phase Two Consultation, updated badger surveys based on the current Order Limits were undertaken in November-December 2024, January 2025 and April 2025 (see **ES Volume 4, Appendix 7.15: Badger Survey Report (2025) [Confidential] [EN010158/APP/6.4]**). This, alongside previous surveys undertaken for badger, detailed in **ES Volume 4, Appendix 7.6: Badger Survey Report (2022) [Confidential] [EN010158/APP/6.4]** is considered to provide a robust baseline for badger. The survey area for badgers comprised the Order Limits and a 30m buffer from the Order Limits, where access	Y

		allowed. Pre-construction badger surveys would be undertaken to confirm status of existing badger setts and to identify the presence of any new setts with appropriate buffers maintained to prevent disturbance or damage to setts. Pre- construction surveys are detailed within and secured by the **Outline CEMP [EN010158/APP/7.2]**. In the unlikely event that a sett cannot be avoided, then set closure would be considered under the appropriate licensing regime. Surveys such as bait marking to monitor badger activity have not been carried out as the Proposed Development would maintain existing setts in situ. Retention of woodland and hedgerows, together with the associated buffers, means that badger would be able to move around the landscape and forage. In addition, security fencing around the solar PV areas would not be buried, enabling badgers to push under at low points and forage under panels. Grassland enhancement both under panels and elsewhere with the Order Limits is likely to increase foraging provision for badgers.

Baseline – commuting and foraging bats	Buckinghamshire Council East Claydon Parish Council	Comments about the survey approach to assessing commuting and foraging bats, including that the approach was not agreed with the host authority, that bat activity surveys did not include all land within the Order Limits (i.e. between parcels), that they were undertaken based on moderate habitat suitability for bats whereas this should be high suitability, that the recommended number of surveys was not undertaken and concern that no further survey work is planned. Other comments reference other datasets that should be utilised, including Natural England's bat radio-tracking work on the Bernwood Population of Bechstein's bat (NE report NECR558) and HS2 baseline data.	Since the PEIR was published, further bat surveys have been undertaken, which has fed into the final assessment undertaken for bats presented within the ES. These are detailed within **ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.16: Paired Static Bat Detector Survey Report (2025) [EN010158/APP/6.4].** The survey approach to assessing commuting and foraging bats has been developed by competent experts, informed by previous surveys undertaken by HS2 and Natural England. Together with data collected by the project team, this provides a robust evidence base of how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development. The Applicant consulted with Natural England with regards to survey methodology for bats. During a meeting (11 March 2025), Natural England officers agreed that the survey effort undertaken for bats was sufficient to inform the baseline in combination with The Bernwood Population of Bechstein's Bats -	Y

		A Non-Technical Summary of the Evidence report (Natural England, 2024). The Applicant acknowledges that the information provided in the Bat Activity Report alone is not sufficient to inform a robust assessment of the likely significant effects of the Proposed Development on foraging, commuting and roosting bats. Therefore, the Bat Activity Report is only one document that has been used to inform the ES assessment and evaluation, with further information including: additional surveys undertaken by the Applicant; The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024); and data obtained from HS2. This has enabled the Applicant to establish a robust baseline on which the ES assessment has been undertaken. Bat activity surveys were undertaken within the areas of the Order Limits where above ground Solar PV modules are proposed. With respect to the cable route, which would result in short-term, temporary effects adjacent and between the areas of solar PV, it is considered that the data set collected was suitable to assess any effects on commuting and foraging bats.

	Therefore, bat activity surveys have not been undertaken within the proposed cable route. Bat activity surveys were not undertaken within some fields within the Parcels due to health and safety risks associated with monitoring within cattle-grazed fields. However, the report published by Natural England to support the Bernwood SSSI designation (The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) clearly indicates that these fields form part of the core sustenance zone for Bechstein's. Therefore, it is already known these areas are important for foraging bats and therefore a re-survey is not required. The Applicant is fully aware of the survey works undertaken to inform the proposals to designate a landscape scale Bernwood SSSI and is proactively engaging with Natural England to ensure mitigation proposals would not result in a significant impact to the SSSI site. The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) was published too late to include within the Bat Activity Report

			assessment. However, the Bat Activity Report is a stand-alone report, supporting the ES as a technical appendix, and not an impact assessment. Information on bat roosts, flightlines and activity from The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024), as well as roosts identified in the desk study, have been interpreted in relation to bat activity as part of the ES assessment.	
Bat roosts	Buckinghamshire Council East Claydon Parish Council	Comments about the approach to assessing impacts on bat roosts. Comments on the survey approach to assessing bat roosts, including that not all of the areas within the Order Limits have been surveyed, that all trees within the Order Limits should be assessed. Comments that due to the presence of Bechstein's bat roosts further survey effort needs to be undertaken to understand potential impacts. Comment that it is not agreed that impacts on roosts can be concluded as not significant given insufficient survey data to understand direct and indirect impacts.	As stated in the PEIR, bat preliminary roost assessment of areas not surveyed during 2022 would be undertaken in 2024/2025. These surveys have now been completed, and the results of the surveys are presented within **ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP/6.4].** The results presented within the bat activity report and roost assessment report are only part of the data that has been used to inform the ES assessment, with further information including: additional surveys undertaken by the Applicant; The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024); and data	Y

	obtained from HS2. This has enabled the Applicant to establish a robust baseline on which the ES assessment has been undertaken. Regarding further survey work to identify key roosts and commuting foraging habitats, bats in the Bernwood area have already been subject to radio tracking surveys every four years since 2012. This methodology was designed to ensure that the bat population wasn't over trapped as the population is already under pressure. From a welfare perspective, undertaking additional radio-tracking surveys for the Proposed Development in between HS2 sessions would not be advised and unlikely to be licensed by Natural England. Works undertaken by Natural England in support of the Bernwood SSSI designation have already identified key Bechstein's roost, home range and core sustenance zone and key commuting routes. These are detailed within The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024). Embedded mitigation measures, including retention of trees suitable to support roosting bats and minimum stand-off

			distances from these features are documented within the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]**, **Outline Operational Environmental Management Plan [EN010158/APP/7.3]**, **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]**, and the **Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4].** Further assessment of impacts to roosting bats is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.	
Bats	Buckinghamshire Council	Comment that it is not clear how the results of the Bat Activity Survey (2024) have influenced the oLEMP.	Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats, which has been informed by the results of bat activity surveys (among other surveys undertaken), and as a result these measures are secured by the **Outline LEMP [EN010158/APP/7.6]**. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches.	Y

Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.

Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development. Solar PV modules have been removed from a number of fields, including from:

- Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood.
- Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's

bat commuting route identified by Natural England along the southern end of Three Points Lane.

- Field D27, adjacent to the eastern edge of Runt's Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI, known to support 12 Bechstein's bat maternity roosts.

Instead, these areas would be used to provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood.

Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow

between Sheephouse Wood, Shrubs Wood and Decoypond Wood to reduce potential displacement effects.

Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity was recorded.

Early planting and habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting is proposed to improve foraging and commuting habitat for bats between woodland blocks; improve connectivity across the Site and to the wider landscape; compensate for hedgerows lost; improve retained hedgerows; improve foraging, nesting/roosting habitat for birds and bats; and provide habitat for black hairstreak and brown hairstreak butterfly and other invertebrate species. In addition, the proposed Satellite Collector Compound

			has been removed from Field B10 since Phase Two Consultation which was proposed to be located adjacent to Sheephouse Wood (see **Appendix 2: Landscape and Ecological Mitigation and Enhancements** of the **Outline LEMP [EN010158/APP/7.6]**).	
Bats	HS2 Buckinghamshire Council East Claydon Parish Council BBOWT	Request for information about how noise during operational phase would impact existing bat populations. Specific reference to the BESS.	The Applicant is aware of recent evidence that has indicated that some species of bat are (to an extent) displaced by Solar PV modules, although the exact mechanism causing the displacement, and over which distance the displacement effect occurs, is not known. In addition, it is acknowledged that disturbance as a result of operational noise from the BESS could occur, which would be confirmed following further detailed noise monitoring assessments. This was reflected within the PEIR assessment which concluded that a permanent, long-term adverse significant effect for the duration of the operational (including maintenance) phase would be likely for commuting and foraging bats. Further work has been undertaken to understand the potential effects of the Proposed Development on bats, which is detailed	Y

			within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The Applicant has proactively engaged with Natural England to ensure mitigation proposals would maintain favourable conservation status of bats.	
Bats	Steeple Claydon Parish Council	Comment that the proposed location of a collector compound near Shrubs Wood could impact rare bats which have been identified in this area.	The Satellite Collector Compound which was proposed to be located adjacent to Sheephouse Wood (Field B10) has been removed since Phase Two Consultation (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).	Y
Bats	Steeple Claydon Parish Council, National Trust BBOWT	Comments that there is evidence that solar panels can impact bat activity. Specific reference made to loss of habitat, reduction in prey, echolocation and collision risk.	The Applicant is aware of the recent evidence that has indicated that some species of bat are (to an extent) displaced by solar arrays, although the exact mechanism causing the displacement, and over what distance the displacement effect occurs, is not known. This is reflected within the assessment detailed within the ES which concludes that a permanent, long-term adverse significant effect for the duration of the operational (including maintenance) phase would be likely for certain species of commuting and	Y

foraging bats. The ES includes an evidence-based assessment of the direct and indirect impacts of the Proposed Development on bats.

Permanent habitat loss within the Order Limits would be limited to land associated with the Rosefield Substation, Collector Compounds, BESS and certain access tracks, with these areas mostly limited to lower value arable and modified grassland habitats. The layout of the Solar PV modules has been designed in three distinct blocks with good connectivity retained and protected between and around these areas. The creation of high-quality habitats, such as a mosaic of species-rich grassland (*c.*95 ha), scrub (*c.* 3.95 ha), woodland planting (*c.* 8.5 ha) and pond restoration and creation, are proposed within areas where solar PV is not located. The locations of dedicated mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. This would help to create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and

			foraging bats. These created and/or restored habitats would also mitigate for the loss of ground-nesting bird habitat and create a nectar source for invertebrates, which in turn would provide a valuable foraging resource for bats and bird species. Along with retaining existing habitats of value, significant buffers would allow for habitat creation and improvements to help mitigate any displacement effect of Solar PV modules on foraging and commuting bats, and avoid the risk of displacement from HS2 mitigation planting, as well as providing habitat suitable to support a range of species.	
Bats	Steeple Claydon Parish Council National Trust HS2 Buckinghamshire Council East Claydon Parish Council BBOWT	Comments about potential adverse impacts on foraging and commuting bats and the importance of the local area in supporting nationally important assemblages of bats, including Bechstein's. Some respondents felt that the mitigation measures are unconvincing, and that these should be explained further. Some respondents felt that the conclusion of effects is based on desk-	The ES includes within its assessment a clear acknowledgement of the importance of the Site for Bechstein's bats. The ES includes an assessment (using the CIEEM-published UK Bat Mitigation Guidelines (2023)) which returns a result of 'National' importance for the bat assemblage present within the Site, recognising that Bechstein's bats are considered a rarity within 'Central England'.	Y

	based research rather than site-specific survey data and more work should be done to understand how bats are currently using the landscape. Other respondents felt that the assessment underplays the importance of this area for Bechstein's bats and the potential impact on species.	The data used to inform the PEIR included all survey data collected at that time and was a relevant baseline, acknowledging this was a snapshot at that point in time. It is acknowledged that the information provided in the Bat Activity Report alone is not sufficient to inform a robust assessment of likely impacts of the Proposed Development to foraging, commuting and roosting bats. However, the bat activity report is a stand-alone report, supporting the ES as a technical appendix, and not an impact assessment. The bat activity report is only one document that has been used to inform the ES assessment and evaluation, with further information including the Applicant's surveys, the Murphy et al. (2024) report, and data obtained from HS2 where available. The Applicant is aware of recent evidence indicating that some species of bat are (to an extent) displaced by solar arrays, although the exact mechanism causing the displacement, and over what distance the displacement effect occurs, is not known. In addition, it is acknowledged that disturbance as a result of operational noise from the BESS is considered likely, which

would be confirmed following further detailed noise monitoring assessments.

This was reflected within the assessment detailed within the PEIR which concludes that a permanent, long-term adverse significant effect for the duration of the operational (including maintenance) phase would be likely to commuting and foraging bats. Further works have since been undertaken to understand the potential effects that solar development may pose to bats which has fed into the final assessment undertaken for bats within the ES. The Applicant is proactively engaging with Natural England to ensure mitigation proposals would maintain favourable conservation status of bats.

Bechstein's bat foraging is primarily associated with the same woodland habitats within which they roost and also along hedgerows, tree lines and watercourses when commuting. The Murphy et al. (2024) report itself states that Bechstein's bats are predominantly woodland foraging species as evidenced by prey studies (the majority of their invertebrate prey species are associated with woodland habitats). However, it is noted that the report also states

Bechstein's bats will utilise pasture and open areas for foraging, with the prey study findings indicating that a proportion of foraging activity takes place in open habitat.

Measures have been 'embedded' into the design of the Proposed Development to remove potential significant effects, such as the considered placement of infrastructure. Embedded (primary) environmental mitigation measures that are considered to be an inherent part of the Proposed Development have included the removal of Solar PV modules within several locations across the Order Limits including:

- Parcel 1a (Fields C1, C2 and C3)
- Knowl Hill (Field B17) and half of Field B9
- Fields in the southern part of Parcel 2 (Fields D27 and D30 to D37)

These areas have been recognised as particularly valuable for commuting and foraging bats. The creation of high-quality habitats, such as a mosaic of species-rich grassland, scrub, woodland planting and pond restoration, are proposed within

these areas. The locations of dedicated mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. This would help to create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and foraging bats. These created/restored habitats would also mitigate for the loss of ground-nesting bird habitat and create a nectar source for invertebrates which in turn would provide a valuable foraging resource for bats and bird species.

In addition to the removal of these areas from the developable area, significant buffers have been incorporated into the embedded design of the Proposed Development to ensure the retention of existing habitats including:

- a minimum 20 m offset from HS2 woodland planting (adjacent to Parcel 1) to the fence line of the Solar PV modules
- a minimum 30 m offset from all fence lines to statutorily, locally designated wildlife sites, ancient woodlands and

existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28.

- a minimum 20 m offset from all fence lines to existing woodlands.
- a minimum 15m offset from all fence lines either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11.
- a minimum 10 m offset from all fence lines to existing hedgerows.
- Retention of all ponds located within the Order Limits and a minimum 10 m offset from all fence lines to existing ponds.
- Minimum offset of least 10 m either side of Main Rivers, ditches and ordinary watercourses and offset at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21 to all fence lines.

Along with retaining existing habitats of value, these significant buffers would allow for habitat creation and improvements to help mitigate any displacement effect of Solar PV modules on foraging and commuting bats and avoid the risk of

			displacement from HS2 mitigation planting, as well as providing habitat suitable to support a range of species.	
Bats	Buckinghamshire Council	Concern that land between Sheephouse Wood and Shrubs Wood are proposed to support satellite collector compound despite this land being identified as providing functionally connectivity for bats.	The proposed Satellite Collector Compound has been removed from Field B10, located adjacent to Sheephouse Wood. Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between fields B7 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood. This would help to reduce potential displacement effects from Solar PV on foraging and commuting bats (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).	Y
Bats	Buckinghamshire Council	Comment that a separate plan should be produced to show proposed mitigation and enhancement for bats.	Mitigation and habitat enhancement proposals for all species including bats is shown on **Outline LEMP, Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**.	Y

Biodiversity Net Gain	Natural England BBOWT	Request for the Applicant to use the latest DEFRA Biodiversity Metric to calculate BNG and follow best practice.	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** sets out how the Proposed Development would achieve biodiversity net gain using the latest version of the Statutory Biodiversity Metric. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.	Y
Biodiversity Net Gain	East Claydon Parish Council Edgcott Parish Council Environment Agency	Comments on Biodiversity Net Gain, including: that this would not be achieved, that the lack of baseline data makes the claim that BNG would be achieved meaningless, and that there are opportunities for betterment through supporting local projects. Other comments set out an ambition for the Proposed Development to achieve a minimum 20% net gain. Specific suggestions including use of species-rich wildflower meadow across the panel area and the panels and with management by	Updated UKHab surveys were undertaken of the Site (see **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). This has provided a robust baseline on which the BNG assessment has been based upon (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). The assessment is also based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is	Y

		seasonal gazing, provision of wide wildflower-rich margins.	committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units. The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and developed in consultation with Natural England, Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust and Buckinghamshire Council. It focuses on compensating adverse effects on habitats and species already known and improving the Site for species that could feasibly colonise in the future given the surrounding landscape.	
Biodiversity Opportunity Area	BBOWT	Comment that the Proposed Development is located within the Bernwood BOA which would jeopardise the strategic aims of the BOA.	The Applicant is aware that the Proposed Development is located within the Bernwood BOA and BBOWT Bernwood Forest and Ray Valley Living Landscape Project. Consultation has been undertaken with BBOWT and relevant consultees relating to these designations to discuss potential effects on the ecological network. The Applicant has had regard to the Buckinghamshire and Milton Keynes Forward to 2030: Biodiversity Action Plan (2023) as part of its assessment of the potential effects of the Proposed Development upon biodiversity as detailed	Y

			in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.	
Biosecurity	East Claydon Parish Council	Comment that biosecurity risks associated with the Proposed Development (e.g. through imports of materials) has not been assessed.	A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and was subsequently updated (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). No invasive species were identified within the Site during the surveys however, the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3], Outline DEMP [EN010158/APP/7.4]** and **Outline LEMP [EN010158/APP/7.6]** identify the requirement for an invasive species method statement and biosecurity protocol which would contain measures for identification and control in the event that invasive species are encountered unexpectedly and prevent accidental introduction on Site, for example through the import of materials and plant.	Y
Birds	Buckinghamshire Council East Claydon Parish Council	Comments that the non-significant effect reported on all groups of birds surveyed is not currently supported as insufficient information is provided on the full extent of all bird species present across the	The areas where embedded mitigation has been incorporated into the design of the Proposed Development would take land out of agricultural production and seek to recreate pasture habitat which would be	Y

BBOWT	Order Limits and further details about mitigation and enhancement areas are required to show this could be accommodated on site. Specific reference made to ground nesting birds such as skylark, wintering birds and owls.	managed appropriately for ground nesting birds, as well as for wintering birds during the operational (including maintenance) phase. This would also improve connectivity for bird species to other areas of suitable habitat in the wider landscape. There is currently no recognised agreed approach to how much mitigation land is appropriate to compensate for loss of skylark habitat. The Applicant has based its approach on a reasonable assessment as to which areas set aside could support in terms of ground nesting bird densities. Also, whilst it is considered that ground nesting birds would not nest under panels, it is highly likely that they would continue to forage in these areas. The embedded mitigation secured by the **Outline LEMP [EN010158/APP/7.6]** includes for the creation and/or improvement of species-rich grassland, scrub, hedgerows, arable field margins and woodland, resulting in an increase of suitable foraging habitat for barn owl, red kite, hobby and peregrine falcon across the Site. All woodland and the majority of hedgerow habitat would be maintained and available for wintering birds as it is now. In addition, the mitigation areas proposed

	would see the creation of extensive areas of new flower-rich pasture habitat which would likely provide sufficient foraging habitat for wintering bird species and be of particular value to lapwing and snipe. The proposed restoration of defunct ponds within the Order Limits would also benefit snipe. Arable margins sown with wild bird seed mix would further add to wintering bird habitat. During the construction and decommissioning phases, displacement through disturbance due to the installation/removal of Solar PV modules and associated infrastructure is predicted to occur to ground nesting, non-ground nesting birds and Schedule 1 bird species. Measures to safeguard ground nesting birds, non-ground nesting birds and Schedule 1 bird species during these phases are outlined within the **Outline CEMP [EN010158/APP/7.2]** and **Outline DEMP [EN010158/APP/7.4]**. Operational maintenance works would be relatively small scale and localised which is not anticipated to cause significant visual or noise disturbance. The **Outline OEMP [EN010158/APP/7.3]** details and secures measures to mitigate and manage

			operational related effects on bird habitats and to prevent disturbance, including measures to prevent air, water and light pollution.	
Embedded mitigation measures	BBOWT	Comment that the embedded mitigation measures are insufficient. Specific reference to bats, with request to remove fields D28 and D29, and provide greater offsets to other key areas for bats (e.g. field boundaries, hedgerows) to create green corridors and protect flight paths.	Survey work using paired static detectors outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has confirmed the importance of hedgerows for foraging bats giving confidence that the approach to mitigation is correct one and would likely maintain habitat connectivity and reduce fragmentation for foraging bat species. Where key areas of bat activity, in particular Myotis activity have been identified, specific measures have been embedded into the design of the Proposed Development. Solar PV modules have been removed from a number of fields, including: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood.	Y

- Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane.
- Field D27, adjacent to the eastern edge of Runt's Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI, known to support 12 Bechstein's bat maternity roosts

Instead, these areas would provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood.

Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between

fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood helping to reduce potential displacement effects from Solar PV on foraging and commuting bats.

Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of Myotis activity was recorded.

Early planting and habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting would aim to improve foraging and commuting habitat for bats between woodland blocks and improve connectivity across the Site and to the wider landscape. In addition, a Collector Compound has been removed from Field B10, located adjacent to Sheephouse Wood (see **Outline LEMP Appendix 2:**

			Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]). Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses, ditches. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure that connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.	
Embedded mitigation measures	East Claydon Parish Council	Query how flightlines between areas of woodland have been considered in the design of the Proposed Development.	Given the sensitivity of the location of the Proposed Development, particularly to commuting and foraging bats, the layout and embedded design principles have	Y

been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses and ditches through appropriate buffers. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.

Survey work using paired static detectors outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** have confirmed the importance of hedgerows for foraging bats giving some confidence that the approach to mitigation is the correct one and would likely maintain habitat connectivity and minimise fragmentation for foraging bat species.

Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been

embedded into the design of the Proposed Development. Solar PV modules have been removed from a number of fields as part of an overall reduction in Solar PV module area, including removal from:

- Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood.
- Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane.
- Fields D27, adjacent to the eastern edge of Runt's Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI, known to support 12 Bechstein's bat maternity roosts

Instead, these fields would be used to provide mitigation areas for bats (and ground nesting birds) including increased foraging resources, woodland edge habitat

and connectivity. Perimeter fencing surrounding the Solar PV development will be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood.

Perimeter fencing surrounding the Solar PV development will be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood helping to reduce potential displacement effects from Solar PV to foraging and commuting bats. Perimeter fencing surrounding the Solar PV development will be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of Myotis activity was recorded. Early planting/habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse

			Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting to improve foraging and commuting habitat for bats between woodland blocks; to improve connectivity across the Site and to the wider landscape; compensate for hedgerows lost; improve retained hedgerows; to improve foraging, nesting/roosting habitat for birds and bats; and provide habitat for black hairstreak and brown hairstreak butterfly and other invertebrate species (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).	
Fish	Environment Agency	Comment that the requirements of the Salmon and Freshwater Fisheries Act 1975 should be incorporated to ensure consideration of impacts on fish. Specific concern raised that mitigation is insufficient to prevent sediment runoff into Claydon Brook which could impact on spawning grounds of protected fish species and specific control measures should be outlined in oCEMP. Request for buffer along Claydon Brook to be	No ponds, ditches or watercourses would be lost to the Proposed Development. There would be a minimum 10m offset buffer from all ponds, ditches and watercourses (including the Claydon Brook) as requested by the Environment Agency, detailed within **Design Commitments [EN010158/APP/5.9].** Measures to prevent sediment runoff during construction, operation (including maintenance) and decommissioning	Y

	extended to 10m due to presence of notable fish. Specific reference to impact of HDD on fish and need for assessment and mitigation measures.	activities are detailed within the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. These would be implemented by the principal contractor and relevant biodiversity elements would be overseen by an Ecological Clerk of Works where required. The Ecological Clerk of Works would be appointed to advise on protecting valued biodiversity features and provide practical, site-specific and proportionate advice on how to achieve compliance with environmental legislation during construction. The **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]** include measures such as best practices to control noise, light, vibration, and airborne and waterborne pollutants, and measures intended to avoid or minimise likely effects for designated sites, habitats and species. The noise and vibration assessment would be undertaken for HDD works where necessary. HDD works would form part of the construction phase assessment as appropriate.

Habitat connectivity	HS2 Buckinghamshire Council	Queries how connectivity between different woodlands in the area will be maintained across solar panel areas and request to ensure nature connectivity channels are provided.	The Applicant is aware of the importance of these areas of woodland that are located adjacent and within close proximity of the Proposed Development. The layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention of these sites. The embedded design principles include a minimum standoff distance from the fence line to these sites and the implementation of standard environmental protection measures during construction, operation (including maintenance) and decommissioning to ensure no direct or indirect impacts will occur. Measures have been 'embedded' into the design of the Proposed Development to remove potential likely significant effects as far as practicable, for example, by the considered placement of infrastructure. The layout of Solar PV modules has been designed in three distinct blocks with good connectivity retained and protected between and around these areas. The creation of high-quality habitats, such as a mosaic of species-rich grassland, scrub, woodland planting and pond restoration and creation, are proposed within areas where solar infrastructure is not located.	Y

The locations of dedicated mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. This would help to create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and foraging bats.

Survey work using paired static detectors outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** have confirmed the importance of hedgerows for foraging bats giving some confidence that the approach to mitigation is the correct one and would likely maintain habitat connectivity and minimise fragmentation for foraging bat species.

Embedded (primary) environmental mitigation measures that are considered to be an inherent part of the Proposed Development have included the removal of Solar PV development within several locations across the Order Limits including:

- Parcel 1a (Fields C1, C2 and C3)
- Knowl Hill (Field B17) and half of Field B9

- Fields in the southern part of Parcel 2 (Fields D27 and D30 to D37)

These areas have been recognised as particularly valuable for commuting and foraging bats. The creation of high-quality habitats, such as a mosaic of species-rich grassland, scrub, woodland planting and pond restoration, are proposed within these areas. The locations of dedicated mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. This would help to create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and foraging bats. These created/restored habitats would also mitigate for the loss of ground-nesting bird habitat and create a nectar source for invertebrates which in turn would provide a valuable foraging resource for bats and bird species.

The sensitivity of the location of the Proposed Development, particularly with respect to commuting and foraging bats, is fully acknowledged. In response, in addition to the removal of these areas from the developed area, significant buffers

have been incorporated into the embedded design to ensure the retention of existing habitats including:

- a minimum 20m offset from HS2 woodland planting (adjacent to Parcel 1) to the fence line of the Solar PV modules
- a minimum 30m offset from all fence lines to statutorily, locally designated wildlife sites, ancient woodlands and existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28.
- a minimum 20m offset from all fence lines to existing woodlands.
- a minimum 15m offset from all fence lines either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11.
- a minimum 10m offset from all fence lines to existing hedgerows.
- Retention of all ponds located within the Order Limits and a minimum 10m offset from all fence lines to existing ponds.

			• Minimum offset of least 10m either side of Main Rivers, ditches and ordinary watercourses and offset at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21 to all fence lines. Along with retaining existing habitats of value, these significant buffers will allow for habitat creation and improvements to help mitigate any displacement effect of Solar PV modules on foraging and commuting bats and avoid the risk of displacement from HS2 mitigation planting, as well as providing habitat suitable to support a range of species.	
Invasive species	Buckinghamshire Council	Comment that the Applicant's approach to identifying and preventing spread of invasive species is considered acceptable. Other comments mention anecdotal evidence of signal crayfish and limitation of the survey approach which took place out of ideal survey season for INNS. Request for a dedicated INNS survey and details about appropriate biosecurity measures.	The comment regarding acceptance of approach to identifying and managing Invasive species is welcomed. The Applicant notes the potential (anecdotal) presence of Signal Crayfish but the Proposed Development is unlikely to cause additional spread of this species if present. The Applicant can confirm that no invasive species were identified within the Order Limits during the preliminary ecological appraisal survey and have not been identified during subsequent surveys (see **ES Volume 4, Appendix 7.7: Preliminary**	Y

			Ecological Appraisal (2025) [EN010158/APP/6.4]). Therefore, the Applicant does not consider invasive species to be present within the Order Limits. However, there is always a risk that invasive species could be introduced via construction traffic or new planting. Biosecurity measures would be undertaken as appropriate to avoid any potential spread. Such measures are detailed within and secured by the **Outline CEMP [EN010158/APP/7.2], Outline LEMP [EN010158/APP/7.6], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.	
Mitigation measures	BBOWT	Comment that habitat creation and plant species should benefit the existing ecological baseline. Specific suggestions included: blackthorn scrub, rough grassland, skylark plots, tall wide hedgerows, larval foodplants, ponds of differing sizes and depths.	This comment is acknowledged and welcomed, and these suggestions have been reflected in the **Outline CEMP [EN010158/APP/7.2]**.	Y
Surveys	National Trust Buckinghamshire Council East Claydon Parish Council	Comments that there are concerns around the depth of ecological surveys undertaken, including that areas for cabling, access tracks and temporary construction compounds have not been assessed, that some surveys are	Site visits/surveys have been undertaken to understand the existing biodiversity baseline conditions, details of the surveys undertaken are presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and the supporting	Y

	incomplete, that species have been inadequately assessed, that parcels have been assessed in isolation as if wildlife exists in silos and that the Applicant hasn't established a good baseline.	appendix reports (see **ES Volume 4, Appendix 7.1 to 7.17 [EN010158/APP/6.4]**). In addition, reports and data sources relevant to the area have been used to aid the understanding of the existing biodiversity baseline conditions and add local context where appropriate. The cable route corridor has been refined significantly since the PEIR therefore this represents a significantly smaller percentage of the overall Order Limits. Survey work of the cable route corridor that has been undertaken is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Given that cable works would be a short-term temporary impact, the survey effort is considered proportionate to this impact as the assessment undertaken within the PEIR for the majority of ecological receptors has determined no significant impact given proposed mitigation to negate impacts. Bat activity surveys were undertaken within the areas of the Order Limits where permanent above ground solar infrastructure will be located. Bat activity surveys have not been undertaken within

		the proposed cable route areas given cabling works would only result in short term and temporary impacts. The Applicant has a very robust data set in which to assess the effect short term and temporary cabling works would have on the commuting and foraging bats and propose appropriate mitigation. The Bat Activity Report is only one document that would be used to inform the assessment and evaluation, with further information including the Applicant's own ongoing survey works, the Murphy et al. (2024) report used in support of the Bernwood SSSI designation, along with data obtained from HS2 where available, used to aid our assessment. Survey coverage has made sure that all areas due to have solar development have been covered by breeding bird survey. An updated preliminary ecological appraisal was undertaken with the results of these updated surveys presented in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4]**, which cover the entire Order Limits.

Ancient woodland and veteran trees	Edgcott Parish Council, National Trust	Comments on ancient woodland, including that the Order Limits includes ancient woodland and disagreement with predicted significance effects for ancient woodland.	The Applicant has identified all areas of ancient woodland within and up to 2km from the Order Limits, as detailed in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.13: Stage 1 Arboricultural Report (2025) [EN010158/APP/6.4].** Potential effects have been assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The embedded mitigation detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline LEMP [EN010158/APP/7.6]** includes a minimum 30m offset from all ancient woodland which exceeds Natural England's standing advice of 15m. There would be no direct land take from ancient woodland located adjacent to the Order Limits and, following the implementation of additional mitigation measures, no direct or indirect adverse impacts on ancient woodland are predicted at any stage of the Proposed Development, which is considered to be **not significant**.	N

Ancient woodland and veteran trees	Buckinghamshire Council	Comment that the Applicant should consider how the 'time-lag' of producing future Veteran and Ancient Trees can be reduced to provide continuity of irreplaceable habitats.	Firstly, it should be noted that the Applicant has designed the Proposed Development to avoid removing trees where practicable, particularly Ancient or Veteran trees. As a result, no Ancient or Veteran trees would be removed as part of the Proposed Development. It is acknowledged that there is a significant time lag for newly planted trees to reach maturity. The Applicant would seek to plant any new hedgerow and tree planting as soon as practicable, including early planting in certain areas ahead of construction works being undertaken, as detailed and secured in the **Outline LEMP [EN010158/APP/7.6].** Should consent be granted, the detailed LEMP (which would be submitted to the Local Planning Authority for approval post-consent) would include details of the location, number, species, size and planting density of any proposed planting. This includes details of any proposed tree, hedgerow and shrub planting and the proposed times of such planting, along with the maintenance requirements of the planting.	N

Ancient woodland	BBOWT Buckinghamshire Council Natural England	Comments on the proposed offsets to ancient woodland and veteran trees, including: • agreement with the proposed 30m buffer from all ancient woodland and veteran trees. the proposed buffer from all ancient woodland is insufficient and should be 50m at a minimum	The embedded mitigation detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]** includes a minimum 30m offset from all ancient woodland which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. The 30m buffer is considered a substantial distance in which habitat creation is proposed to provide suitable commuting and foraging routes for bats, maintaining links between existing woodland blocks and providing connectivity to the wider landscape. The paired static detector surveys (see **ES Volume 4, Appendix 7.16: Paired Static Bat Detector Survey Report [EN010158/APP/6.4]**) indicate the importance of the hedgerow resource to the bat assemblage, including both foraging and commuting Bechstein's bat and barbastelle bat. Surveys undertaken by Natural England indicate the importance of the woodland resource for Bechstein's bat. This provides confidence that the 30m buffer from ancient woodland mitigation	N

			would be effective and that a 50m would not be required. As detailed in **ES Volume 2: Chapter 7: Biodiversity [EN010158/APP/6.2]**, following the application of additional mitigation measures, no direct or indirect adverse impacts are predicted on ancient woodlands within and adjacent to the Order Limits through the lifetime of the Proposed Development.	
Ancient woodland and veteran trees	Buckinghamshire Council	Request for the proposed PRoW diversions to be removed unless the distance is increased between sensitive receptors and the existing routes. Specific reference to diversion in Parcel 1 which would reduce proximity between Shrubs Wood and PRoW, resulting in intensification of usage within the buffer zone and increase vulnerability of the woodland. Request for the new permissive route to be relocated to remain outside of required buffer zones for all Ancient Woodland, other Woodland, Hedgerows and Veteran and Ancient Trees.	The embedded mitigation detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]** includes a minimum 30m offset from all ancient woodland which exceeds Natural England's standing advice of 15m. As detailed in **ES Volume 2: Chapter 7: Biodiversity [EN010158/APP/6.2],** following the application of additional mitigation measures, no direct adverse impacts are predicted on ancient woodlands within and adjacent to the Order Limits through the lifetime of the Proposed Development. Proposed PRoW diversions and new permissive routes in Parcel 1 would be	N

			unsurfaced tracks to avoid any physical impacts on the Root Protection Area. The new permissive route would be 14.5m to the south of Shrubs Wood at the closest point and the closest diverted PRoW (ref SCL/13/1) would be 10m to the west of Shrubs Wood. It has been assessed that the PRoW diversions and permissive footpaths would not result in direct or indirect impacts to ancient woodland sites.	
Approach to Arboriculture Survey	Buckinghamshire Council	Comments that the arboriculture survey is inadequate, including the approach to determining accurate locations, lack of clear data and insufficient information for sensitive receptors within the buffer zone, use of outdated measurement methodology and avoidance of areas around ancient woodland. Request to undertake surveys in accordance with BS5837:2025. Comment that species surveys should be undertaken.	The Applicant's survey was carried out in accordance with British Standard BS5837 2012 using topographical drone survey as base mapping and is the UK's accepted guidance for assessing trees in development. This provides an adequate buffer between trees (above and beyond normal Root Protection Areas) and lays out avoidable impacts, which is of most importance. The current British Standard (2012) does not explicitly specify that a suffix of any kind should be used to define woodlands. That said, the data for woodland areas could be extracted and changed and shown in a new table but this would have a time implication for both data manipulation and on plan as currently they all run as	N

concurrent group features. The data table does provide notes where the groups are woodland parcels and where they are ancient semi natural designation, and so it is easy to differentiate which areas are woodland, both on plan (purely by size) and within the data table. The report also notes which groups comprise significant woodlands. It is not considered necessary to list them as no works are proposed near them, or within a 30m buffer from woodland edge.

The BS5837:2025 has yet to be adopted and was not released in draft at the time of survey. It is also worth noting that it is possible that not all of the recommendations in the draft will be included in the new standard.

Should further surveys be required at the detailed design stage (post-consent), these would be undertaken in accordance with the relevant British Standard in force at that time.

Species surveys are not part of an arboricultural survey and therefore have not been undertaken.

Approach to Arboriculture Survey	Buckinghamshire Council	Comment that 'category A' trees should be shown with a root protection area equal to 15 times their diameter at 1.3m and that 'category C' trees should also be assessed.	The Applicant notes that the draft BS5837:2025 was not in existence — nor available even in draft form — at the time the survey was undertaken. It would therefore be unreasonable to expect its guidance to have been followed retroactively. All root protection areas have the current BS5837 2012, 12x stem diameter applied. Category C have been assessed in accordance with the BS5827 2012 which defines them as trees of low quality and value, with a remaining life expectancy of at least 10 years. The methodology applied during the survey adhered to the relevant standards and best practice guidance which were current and widely accepted, including BS 5837:2012 – "Trees in relation to design, demolition and construction – Recommendations", ensuring a robust and professional assessment.	N
Arable non crop plants	Buckinghamshire Council	Comments on assessment of arable crop and non-crop plants. Comments on the baseline, including that no survey work specific to arable plants has been undertaken to inform a baseline and identify all species.	As detailed in **ES Volume 4, Appendix 7.7: Preliminary Environmental Appraisal (2025) [EN010158/APP/6.4]** a survey for notable arable crop and non-crop plants was undertaken by an experienced botanist (FISC Level 4) in June 2023, the results of which were used	N

		Comments that residual effects are not agreed including that more survey effort is required, and that indirect impacts should be considered e.g. change in agricultural practices.	to inform the baseline. Locations of arable field margins are presented in **ES Volume 3, Figure 7.3: UKHab Habitat Classification Survey Results [EN010158/APP/6.3]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** highlights the importance of arable field margins for a variety of species, which is reflected in the embedded design principles detailed in **Table 7.6**, such as the retention and buffers from these margins, with additional mitigation proposed to protect arable field margins from potential impacts area a result of construction, operation (including maintenance) and decommissioning works, ensuring no residual effects will occur to arable field margins. Creation of new arable field margins and management of new and retained arable field margins is detailed within and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**.	
Baseline – breeding birds	Buckinghamshire Council East Claydon Parish Council	Comments on the survey approach for breeding birds including that the 2024 survey is below guidelines, that the areas surveyed differed over the two survey periods, that the surveys did not cover all	As a result of the survey effort undertaken for breeding bird over two years, the Applicant considers that its data set for assessing the effects of the Proposed Development on breeding birds is robust.	N

	land within the Order Limits (i.e. just parcels) and therefore ecological impacts of works such as cabling, access tracks and temporary compounds cannot be assessed, that woodland adjacent to the Order Limits should be surveyed, and that the current data prevents a robust understanding of what mitigation or compensation may be required. Other comments suggest that species estimates are underestimated with specific reference to raptors, owls, woodpeckers, skylarks.	The industry standard for breeding bird surveys states that six visits for breeding bird survey is the suggested minimum. However the guidance does state that providing it can be robustly justified, the ornithologist can make a professional judgment as to the number of survey visits. Given that the Applicant had two years' worth of data (with the survey in 2022 having six visits), the professional judgment of the ornithologist was that five visits would be sufficient in 2024 provided these were well spread out during the survey season. All areas proposed for solar PV development have been covered by breeding bird survey. Survey routes followed the length of all hedgerows, fence-lines and field margins (including paths, tracks and roads). Deviations into areas of set-aside, stubble fields, scrub, woodland and other uncultivated habitats were made, where possible. With respect to the cable route, which would result in short-term, temporary effects adjacent and between the solar PV areas, it is considered that the ornithological data set collected was

suitable to assess any effects on resident breeding bird assemblages.

It is noted that birds are highly mobile, and any survey is necessarily a snapshot in time, and not all species numbers (including raptors, owls, woodpeckers and skylarks) will necessarily be recorded at the time of survey. Therefore, the Applicant has ensured a robust data set underpins the assessment set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.This includes two years' worth of survey data which is further supported with desk study data results detailed within **ES Volume 4, Appendix 7.4: Breeding Bird Survey Report (2022) [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.12: Breeding Bird Survey Report (2024) [EN010158/APP/6.4]**

All woodland and the majority of hedgerow habitat would be maintained and available for breeding birds as it is now. In addition, proposed mitigation areas would see the creation of extensive areas of new flower – rich pasture habitat which would provide sufficient foraging habitat for breeding bird species and also provide nesting habitat for ground nesting birds, detailed within **ES Volume 2, Chapter 7: Biodiversity**

			[EN010158/APP/6.2] and the **Outline LEMP [EN010158/APP/7.6]**.	
Baseline – wintering birds	Buckinghamshire Council East Claydon Parish Council	Comment about the survey approach to assessing wintering birds including that areas outside of the parcels were not assessed, that the survey effort is not sufficient (including that Parcel 3 was not surveyed in 2023/4) and this should be undertaken and that the current data prevents a robust understanding of what mitigation or compensation measures may be required, and that surveys only took place in a single season which doesn't reflect effects of crop rotation. Comment that almost three quarters of the 60 species recorded are subject to special designations.	Wintering bird surveys detailed within **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4]** were undertaken between October 2021 - March 2022, based on a superseded version of the Order Limits. Updated wintering bird surveys were undertaken between November 2023 – February 2024 based on the updated Order Limits. The results of these surveys are found in **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4]**, with the information contained within **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4]** used to inform the desk study element of the updated survey report. As a result of this survey effort undertaken for wintering bird over two years, the Applicant considers that its data set for assessing the effects of the Proposed Development on wintering birds is robust. With respect to the cable route, which would result in short-term, temporary	N

			effects adjacent and between the solar PV areas, it is considered that the ornithological data set collected was suitable to assess any effects on wintering bird assemblages. No survey work was undertaken in Parcel 3 as access could not be obtained. However, the Applicant had data for Parcel 3 from 2021/22 and from adjacent fields in 2023/4. This, combined with the fact that arable and improved grassland present in Parcel 3 is well represented elsewhere on site means the Applicant has sufficient data on which to base its assessment. With respect to specially designated species identified by the Applicant, the design of the Proposed Development includes proposed mitigation areas to ensure habitat to support these species, detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and the **Outline LEMP [EN010158/APP/7.6]**.	
Black Poplars	Buckinghamshire Council	Comments about Black Poplar, including that a buffer should be provided commensurate with their height plus 15m, request for gender assessments/DNA testing to be undertaken and that an area specifically for the reproduction of Black	DNA testing to confirm the presence of native black poplar (Populus nigra subsp. betulifolia) is a specialist process that requires laboratory analysis and falls outside the scope of standard arboricultural survey requirements. The group of trees	N

		Poplars in proximity to existing specimens to aid in their conservation supported by management plans.	with potential to be black poplar is entirely unaffected by the Proposed Development. A substantial buffer has been maintained around these trees, extending well beyond their calculated root protection areas, ensuring these trees are fully protected throughout the works.	
Boundary treatment	HS2	Request for further information on the boundary treatment around the Order Limits.	Details of management of boundaries are included within the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]** and **Outline Operational Environmental Management Plan [EN010158/APP/7.3]**.	N
Catchment areas	Environment Agency	Comment referring the Applicant to the Cherwell & Ray and Upper & Bedford Ouse catchment partnerships	The assessment has not identified any significant impacts on watercourses or associated species.	N
Deadwood	Buckinghamshire Council	Comment that all deadwoods should be retained, with information about how deadwood would be managed and distributed through the site included in management plans.	As secured in the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**, the Applicant would retain all deadwood habitat with a minimum 30m buffer to the fence line from designated sites and ancient woodland and 20m from other woodland habitat.	N
Designations	East Claydon Parish Council	Comments relating to the importance and number of special ecological designations adjoining the sites, including SSSI which	The Applicant is aware of the importance of these areas of woodland (Sheephouse Wood SSSI, Finemere Wood SSSI,	N

	Edgcott Parish Council Land interest National Trust BBOWT	would be contrary to policy and potentially harmful. Specific reference also made to LWS adjacent to the Proposed Development. Other comments felt that the value of these habitats had not been considered, including their wider contribution to a wider habitat area that relies on connectivity. Comment that detailed mitigation measures should be published. Suggestion that the areas should be improved for connectivity, with woodlands liked by developing semi-natural habitats.	Grendon and Doddershall Woods SSSI, Ham Home-cum-Hamgreen Woods SSSI Greatsea Wood LWS, Shrub Woods LWS, Decoypond Wood LWS, Romer Wood LWS, Runts Wood LWS, Finemere WTR,Home Wood, Middle Claydon LWS and Balmore Wood LWS) that are located adjacent and within close proximity of the Proposed Development, as outlined and assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].** The layout of the Proposed Development and embedded design principles have been designed to ensure the retention of these sites. For example, embedded design principles include a minimum standoff distance from Solar PV modules and associated infrastructure from these sites. Standard environmental protection measures during construction and decommissioning would be implemented to ensure no direct or indirect impacts would occur. These are detailed and secured in the **Design Commitments [EN010158/APP/5.9]**. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design

			principles have been deliberately designed to ensure the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. By creating species-rich grassland and arable margins along with scrub and tree planting within these buffers, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. Mitigation is detailed within and secured by the **Outline LEMP [EN010158/APP/7.6]**	
Embedded mitigation measures	Buckinghamshire Council	Comment that removal of areas proposed for solar is not embedded mitigation as presence of solar panels is not the baseline.	For the purposes of the ES, embedded 'primary' mitigation measures form part of the Proposed Development, in accordance with the Institute of Environmental Management and Assessment's (IEMA) 'Environmental Impact Assessment Guide to Shaping Quality Development' (see **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**). **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** describes the embedded (primary) environmental mitigation measures that are considered to be an inherent part of the Proposed Development i.e., the design principles	N

			adopted to avoid or prevent adverse environmental effects. These are detailed and secured in the **Works Plans [EN010158/APP/2.3]** and **Design Commitments [EN010158/APP/5.9].**	
General comment – Biodiversity	Buckinghamshire Council	Comment that the local area is ecologically significant and supports nationally important species such as Bechstein's Bat and black hairstreak butterflies.	At the time of the PEIR the design of the Proposed Development was ongoing and the PEIR provided a preliminary environmental assessment of the design to at that point in time. A full assessment of ecological receptors is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The Applicant is aware of the importance of these areas of woodland that support Bechstein's bat and black hairstreak butterflies which are located adjacent and within close proximity of the Proposed Development, as has been reflected within the ES, with ongoing consultation undertaken with Natural England. The layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention of these sites. The embedded design principles detailed within and secured by the **Outline LEMP [EN010158/APP/7.6]** include a minimum	N

		30m standoff distance from Solar PV modules and associated infrastructure from these sites and the implementation of standard environmental protection measures during construction and decommissioning to ensure no direct or indirect impacts would occur. Given the sensitivity of the location of the Proposed Development, particularly commuting and foraging Bechstein's bats, the layout and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses and ditches through appropriate buffers. By creating species-rich grassland and arable margins along with scrub and tree planting within these buffers, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** fully considers terrestrial invertebrates, noting the records of protected and notable terrestrial invertebrate species located within proximity of the Proposed Development

		boundary including black hairstreak (*Satyrium pruni*). A preliminary assessment for habitats suitable to support notable and protected invertebrate species was undertaken as part of **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]** updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). The majority of the habitats present were considered likely to support a common assemblage of invertebrate species, typical of arable field margins, hedgerows, woodland and scrub and grassland habitats, however the assessment noted that the butterfly species included within the citations for Sheephouse Wood and Finemere Wood SSSI will use both woodland and hedgerow margin habitat. Blackthorn, the food source for black hairstreak caterpillar, a species included as a SSSI citation feature, was recorded abundantly across the site within hedgerows and woodland areas. Area of woodland that support Blackthorn within the development boundary would be retained entirely, whilst hedgerows that support Blackthorn would be mostly retained in their entirety, although limited small-scale removals is

			required to facilitate access or underground cabling. Targeted surveys of sections of hedgerow that would require removal would be undertaken pre-construction to assess for the presence of black and brown hairstreak butterfly eggs, with section of hedgerow that support black and brown hairstreak eggs translocated to other areas within the Order Limits. There is not expected to be an overall loss of suitable habitat for these species as hedgerows would be replanted and enhanced following completion of works and other habitat creation and enhancement works secured by the **Outline LEMP [EN010158/APP/7.6]** and through a detailed biodiversity design to identify how net gain Biodiversity Net Gain is achieved (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**).	
General comment – Biodiversity	Natural England	Comment that consideration should be given to the potential environmental value of brownfield sites, including open mosaic habitats.	No open mosaic habitat or brownfield sites are located within or adjacent to the Order Limits.	N

General comment – Biodiversity	East Claydon Parish Council	Comment that there has not been consideration given to impacts on wildlife corridors.	Considerable consideration has been given to ensure the design of the scheme protects and enhances wildlife corridors. Given the sensitivity of the location of the Proposed Development, particularly to commuting and foraging bats, the layout and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses and ditches through appropriate buffers. By creating species-rich grassland and arable margins along with scrub and tree planting within these buffers, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting bird habitat and create a nectar source for invertebrates, which in turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area,	N

			provide additional bat foraging habitat and support great crested newts. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. The locations of habitat creation proposals are detailed within **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).	
General comment – Biodiversity	East Claydon Parish Council Edgcott Parish Council Granborough Parish Council Land interest	Comment that wildlife would be disrupted as a result of the Proposed Development, including birds, butterflies, harvest mice, bank voles, otters, GCNs, deer, skylark.	A full assessment of ecological receptors is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Given the sensitivity of the location of the Proposed Development, particularly to commuting and foraging bats, the layout and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses and ditches through appropriate buffers. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure the connections between the	N

existing SSSIs and ancient woodland adjacent to the Site would be enhanced.

By creating species-rich grassland and arable margins along with scrub and tree planting, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting bird habitat suitable to support skylark and create a nectar source for invertebrates, which in turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area, provide additional bat foraging habitat and support great crested newts. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger, otter, harvest mice, bank voles and deer. Buffer zone between fences and hedgerows/field margins would also allow animals such as deer to disperse along the buffer through the wider landscape.

	A detailed biodiversity design has been developed which identifies how a net gain in biodiversity would be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6].** On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units. The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and has been developed in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. It focuses on compensating adverse effects on habitats and species already known and improving the Site for species that could feasibly colonise in the future given the surrounding landscape (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** and **Outline LEMP**

			Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]).	
General comment - biodiversity	East Claydon Parish Council Land interest	Comment that conservation and habitat creation efforts locally would be negatively impacted by the Proposed Development. Other comments felt that the scale of the Proposed Development meant damage to habitats would be unavoidable.	The majority of habitat located within the Order Limits is dominated by arable farmland and modified grassland which is considered to be of relatively low biodiversity value, with the layout of the Proposed Development deliberately designed to retain habitats of higher value. The embedded design principles include for the retention, creation and enhancement of habitats such as species-rich grassland, scrub, field margins, all woodland, hedgerows, trees, ponds, watercourses and ditches. Although there would be large areas of the site covered by solar panels, evidence has shown that vegetation would grow underneath solar panels, in particular the rides between the individual panels. The planting schedule would include for species that are tolerant of these conditions. The biodiversity design would be cognisant of local biodiversity priorities already identified for the areas and has been developed in consultation with Natural England, Berkshire,	N

			Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. These measures would focus on compensating adverse effects on habitats and species already known, and to improve the Site for species that could feasibly colonise the Site in the future given the surrounding landscape. Measures to protect retained and newly created habitats during construction, operation (including maintenance) and decommissioning activities are detailed within the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. These would be implemented by the principal contractor and relevant biodiversity elements would be overseen by an Ecological Clerk of Works where required.	
General comment – biodiversity	HS2	Comments requesting more information about how the Proposed Development would enhance existing habitats and how no net loss could be demonstrated.	The majority of habitat located within the Order Limits is dominated by arable farmland and modified grassland which is considered to be of relatively low biodiversity value. The layout of the Proposed Development has been deliberately designed by the Applicant to retain habitats of higher value, where the	N

embedded design principles include for the retention, creation and enhancement of habitats such as species-rich grassland, scrub, field margins, woodland, hedgerows, trees, ponds, watercourses and ditches.

A detailed biodiversity design has been developed which identifies how a net gain in biodiversity would be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.

The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and has been developed in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. It focuses on compensating adverse effects on habitats

			and species already known and improving the Site for species that could feasibly colonise in the future given the surrounding landscape (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**).	
Great Crested Newts	Buckinghamshire Council East Claydon Parish Council	Comments on the assessment of Great Crested Newts. Comment agreeing with the Applicant's approach to identifying and mitigating effects on GCN. Comment that the need to apply for a licence implies loss of the local population and the Applicant should rethink its approach.	To date habitat suitability index (HSI) and environmental DNA (eDNA) surveys for GCN have been undertaken (see **ES Volume 4, Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report 2023 [EN010158/APP/6.2]**). The embedded design principles include a minimum standoff distance from Solar PV modules and associated infrastructure of 10 m from ponds. As a result, there would be no direct loss of great crested newt breeding habitat. The environmental mitigation measures incorporated into the design of the Proposed Development (including restoration of defunct ponds and provision of species-rich grassland and scrub, hedgerow and woodland planting) have the potential to significantly improve great crested newt terrestrial habitat across the Site. In addition, the restoration of defunct	N

			ponds would increase the amount of breeding habitat available. District Level Licensing (DLL) is a strategic approach to authorising developments affecting great crested newts, it is a Natural England-approved alternative to the standard licensing system where licences are held by local planning authorities instead of individual developers, of which Buckinghamshire Council has signed up to the scheme. There are various approaches used to implement DLL and the Applicant is in consultation with NatureSpace Partnership and Natural England to ensure the best outcomes for GCN are achieved. If the DLL approach is undertaken for the Proposed Development, then the survey effort undertaken to date is sufficient survey effort to inform this application. If the traditional licensing route through Natural England is decided upon then population estimate surveys would be undertaken pre-construction to inform the European Protected Species Licence application.	
Guidance	Environment Agency	Comment that the Applicant should refer to the Local Nature Recovery Strategy	All BNG mitigation and enhancement would be delivered within the Order Limits, negating the need to compensate further	N

		2025 to inform off-site BNG delivery and environmental enhancements.	away from where potential impacts would occur. The aims of the Buckinghamshire Pilot Draft Local Nature Recovery Strategy have been incorporated into the design of the Proposed Development where possible to ensure it helps to support nature's recovery to create more, bigger, better, and joined-up habitats across Buckinghamshire and deliver wider nature-based environmental benefits.	
Habitat creation	Natural England	Comment that created and enhanced habitats should be local to any potential impacts and deliver strategically important outcomes for nature conservation in line with relevant strategies.	All mitigation would be delivered within the Order Limits, negating the need to compensate further away from where potential impacts would occur. A detailed biodiversity design has been produced outlining how a net gain in biodiversity would be achieved using the latest version of the Statutory Biodiversity Metric. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.	N

			The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and has been developed in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. The aims of the Buckinghamshire Pilot Draft Local Nature Recovery Strategy have been incorporated into the design of the Proposed Development where possible to ensure it helps to support nature's recovery to create more, bigger, better, and joined-up habitats across Buckinghamshire and deliver wider nature-based environmental benefits. These measures would focus on compensating adverse effects on habitats and species already known, and to improve the Site for species that could feasibly colonise the Site in the future given the surrounding landscape.	
Habitat creation	Environment Agency	Comment that more detail on the project principle to improve habitats along watercourse margins should be provided to ensure these are suitable and reflect the scale of the Proposed Development. Suggestions of sowing grassland and	No ponds, ditches or watercourses would be lost to the Proposed Development. There would be a minimum 10m offset buffer from ponds, ditches and watercourses, as detailed within **Design Commitments [EN010158/APP/5.9]**. Watercourse buffers have been designed to meet the requirements of both the IDB	N

		wildflower mix, ensuring buffers measure from the bank-top of watercourses.	and the BNG requirements. Wet grassland is proposed as part of the enhancement area adjacent existing watercourses within the Order Limits. Areas of wet grassland planting containing moisture-loving grass and wildflower species would be situated around the periphery of water bodies or in grassland areas prone to be seasonally inundated with water (see **Outline LEMP [EN010158/APP/7.6]**).	
Habitat creation	BBOWT	Comment that there is a lack of ambition to create habitats amongst the panels, and ecological enhancements should be interspersed across the Proposed Development to create stepping stones for wildlife, rather than isolated at site edges. Specific reference to wide species rich field margins, hedgerow creation and enhancement, rough grassland and scrub creation, and the creation of scrapes, channels, ponds and wetland. Comment that more information is required on maintenance of these habitats, including potential for grazing animals.	Mitigation proposed is not just isolated pockets on the edge of the site, there are significant areas interspersed throughout the Proposed Development in the form of buffers from hedgerows and woodland edges where a mosaic of species-rich grassland, arable margins and scrub planting is proposed, helping to link the dedicated mitigation areas together. Survey work using paired static detectors outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** have confirmed the importance of hedgerows for foraging bats giving some confidence that the approach to mitigation is the correct one and would likely maintain habitat connectivity and minimise fragmentation for foraging bat species.	N

	The habitat directly underneath Solar PV modules and between the Solar PV modules is likely to be sown and managed as flower-rich grassland or herbal leys rather than the arable farmland or grassland, which currently dominates the Site, and is of limited biodiversity value. This would provide a nectar resource for invertebrate which in turn would provide a food resource for a range of species including bats and birds. Embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses and ditches through appropriate buffers. Along with retaining existing habitats wherever possible, the locations of large mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting

		bird habitat and create a nectar source for invertebrates, which in turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area, provide additional bat foraging habitat and support great crested newts. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. The Proposed Development would be further refined at the detailed design/discharge of requirements stage, where further opportunities for biodiversity mitigation will be considered e.g. any 'leftover' areas following refinement of the design could be repurposed for additional mitigation and enhancements. There is potential for the management of grassland within the Order Limits to be undertaken by a combination of sheep (under panels) and cattle grazing (areas with no panels). If grazing for any reason is not possible then a late summer hay cutting regime would be implemented

			recognising the importance of grazing animals to foraging bats. Details of habitat proposals and management are provided in the **Outline LEMP [EN010158/APP/7.6].**	
Health	East Claydon Parish Council Land interest	Comment expressing concern about the impact of the Proposed Development on animal health (dust, glare, noise and vibration). Specific references made to farm livestock and animals at Hogshaw Farm and Wildlife Park.	The **Outline Construction Environment Management Plan [EN010158/APP/7.2]** includes measures such as best practices to control noise, light, vibration, and measures intended to avoid or minimise likely effects for designated sites, habitats and species. Hogshaw Farm buildings and fields have been considered in the glint and glare assessment. The implementation of standard environmental protection measures during construction, operation (including maintenance) and decommissioning, such as dust suppression and pollution prevention, would be adopted and these measures are documented within the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.	N
Hedgerow	BBOWT	Comment that hedgerows should be retained and enhanced, with any loss substantially compensated with new	The majority of hedgerows would be protected from construction works. However, hedgerows would need to be	N

	planting. Comment that there should be a 15m buffer between any built elements and hedgerows.	crossed by the Grid Connection Cable Corridor, Interconnecting Cable Corridors and Internal Access Corridors. Cable installation and highways access proposals for visibility splays would also require sections of hedgerows to be removed. The layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention of hedgerows and reinstatement of removed sections of hedgerows as far as practicable. Details of the maximum amount of hedgerow removal proposed is shown in the **Outline LEMP, Appendix 3: Vegetation Removal Parameters [EN010158/APP/7.6]** and secured in schedules in the **Draft DCO [EN010158/APP/3.1]**. New hedgerow planting (*c.*3,420m) would be implemented across the Site along with improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' where required is also proposed, increasing the overall amount of hedgerow habitat within the Site compared to the current baseline and within the buffer regions habitats would be created comprising a mosaic of species rich grassland and scrub planting

			(see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**). During the operation (including maintenance) phase, there would be a minimum 15m offset from the fence line to existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11 plus an additional 5m offset to the nearest Solar PV modules creating an overall 20m buffer. There would be a minimum 10m offset from the fence line to all other existing hedgerows plus an additional 5m offset to the nearest Solar PV modules creating an overall 15m buffer. Measures to minimise the impact of construction, operation (including maintenance) and decommissioning activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4],** **Outline CEMP [EN010158/APP/7.2]** and **Outline SMP [EN010158/APP/7.7]**.	
Hedgerow	Natural England	Comment that the local hedgerow network is integral to the ecological	A full assessment of hedgerows is presented within **ES Volume 2, Chapter 7:**	N

	functioning of landscape and connectivity between isolated woodland blocks, enabling the area to function as a more extensive wooded area capable of supporting nationally important bat populations. Request for the Applicant to undertake invertebrate surveys and consider the potential impact of hedgerow loss on Black Hairstreak.	**Biodiversity [EN010158/APP/6.2]**. The layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention of hedgerows and reinstatement of removed sections of hedgerows as far as practicable. Measures to minimise the impact of construction, operation (including maintenance) and decommissioning activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4],** **Outline LEMP [EN010158/APP/7.6]** and **Outline SMP [EN010158/APP/7.7]**. New hedgerow planting (*c.*3,420m) would be implemented across the Site along with improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' where required is also proposed and within the buffer regions habitats would be created comprising a mosaic of species rich grassland and scrub planting (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**). Along with retaining existing habitats wherever possible, the locations of large

	mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting bird habitat and create a nectar source for invertebrates, which in turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area, provide additional bat foraging habitat and support great crested newts. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** fully considers terrestrial invertebrates, noting the records

	of protected and notable terrestrial invertebrate species located within proximity of the Proposed Development boundary including black and brown hairstreak, species that are included within the citations for Sheephouse Wood SSSI and Finemere Wood SSSI which are located adjacent to the Order Limits. A preliminary assessment for habitats suitable to support notable and protected invertebrate species was undertaken as part of **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]** updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4**]. The majority of the habitats present were considered likely to support a common assemblage of invertebrate species, typical of arable field margins, hedgerows, woodland and scrub and grassland habitats, however the assessment noted that the three butterfly species included within the citations for Sheephouse Wood and Finemere Wood SSSI will use both woodland and hedgerow margin habitat. Blackthorn, the food source for black hairstreak caterpillar, a species included as a SSSI citation feature, was recorded abundantly across

		the site within hedgerows and woodland areas. Area of woodland that support Blackthorn within the development boundary would be retained entirely, whilst hedgerows that support Blackthorn would be mostly retained in their entirety, although limited small-scale removals could be required to facilitate access or underground cabling. Targeted surveys of sections of hedgerow that would require removal would be undertaken pre-construction to assess for the presence of black and brown hairstreak butterfly eggs, with section of hedgerow that support black and brown hairstreak eggs translocated to other areas within the Order Limits. There is not expected to be an overall loss of suitable habitat for these species as hedgerows would be replanted and enhanced following completion of works and other habitat creation and enhancement works secured by the **Outline LEMP [EN010158/APP/7.6]** and through a detailed biodiversity design to identify how net gain Biodiversity Net Gain is achieved (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**).

Impact on habitats	Buckinghamshire Council	Comment that retention of suitable winter habitat is crucial to maintain important wintering bird species identified.	The embedded mitigation detailed and secured by the **Outline LEMP [EN010158/APP/7.6]** includes for the creation and/or improvement of species-rich grassland, scrub, hedgerows, winter seed source in arable field margins and woodland, resulting in an increase of suitable foraging habitat for wintering birds across the Site. On completion of Interconnecting Cable Corridor works, these areas would be available for wintering birds to use again as land would be returned to agricultural use and hedgerow gaps replanted.	N
Impact on SSSIs	Natural England	Comment that further work is needed to assess potential impacts on SSSIs as key aspects of proposed mitigation measures (e.g. pond management, planting) have not yet been finalised. Comment that the assessment should also consider SSSI designated interest features and specifically how they interact with the identified impact pathways, as well as consideration to the proposed SSSI extension.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes a full assessment of the direct and indirect effects of the Proposed Development to the citation features of the SSSI sites and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** also considers all potential impact pathways and assesses any impacts arising from the Proposed Development which are likely to result in significant effects on ecological receptors	N

			associated with the SSSI sites and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The assessment is based upon up-to-date survey data collected for the Proposed Development in combination with data collected as part of other nearby development schemes to provide a robust baseline on which the ES assessment has been undertaken. At the time of writing (September 2025), limited information on the proposed Bernwood SSSI designation is publicly available and the date for designation is not yet known. Therefore, the proposed Bernwood SSSI has not been specifically considered in the assessment as a receptor in its own right. However, Sheephouse Wood SSSI, Finemere Wood SSSI, Grendon and Doddershall Woods SSSI, ancient woodland and Bechstein's bats (all of which would fall under the proposed Bernwood SSSI designation) have all been scoped into the assessment and fully assessed.	
Invertebrates	Buckinghamshire Council	Comments on the assessment of invertebrate species.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** fully considers terrestrial invertebrates, noting the records	N

	East Claydon Parish Council BBOWT	Comment that the baseline data is inadequate as no specific surveys have been carried out for invertebrates. Specific comments made to establishing potential for lepidoptera, glow worm, aquatic invertebrates, black and brown hairstreak butterfly eggs. Comment disagreeing that significant beneficial effects for invertebrates can be concluded due to insufficient survey data and need for consideration of indirect impacts e.g. fragmentation of trees and woodlands on invertebrates specialising in deadwood habitat, impact of water quality on freshwater invertebrates. Comment that wider foraging requirements for protected species have not been considered.	of protected and notable terrestrial invertebrate species located within proximity of the Proposed Development boundary including black hairstreak (*Satyrium pruni*). A preliminary assessment for habitats suitable to support notable and protected invertebrate species was undertaken as part of **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]** updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). The majority of the habitats present were considered likely to support a common assemblage of invertebrate species, typical of arable field margins, hedgerows, woodland and scrub and grassland habitats, however the assessment noted that the butterfly species included within the citations for Sheephouse Wood and Finemere Wood SSSI would use both woodland and hedgerow margin habitat. Blackthorn, the food source for black and brown hairstreak caterpillar, species included as SSSI citation features, was recorded abundantly across the site within hedgerows and woodland areas, and therefore we can safely assume presence without the need for survey to confirm what we already

know. Areas of woodland that support Blackthorn within the development boundary would be retained entirely, whilst hedgerows that support Blackthorn would be mostly retained in their entirety, although limited small-scale removals could be required to facilitate access or underground cabling. Targeted surveys of sections of hedgerow that would require removal would be undertaken pre-construction to assess for the presence of black and brown hairstreak butterfly eggs, with section of hedgerow that support black and brown hairstreak eggs translocated to other areas within the Order Limits.

There is not expected to be an overall loss of suitable habitat for these species as hedgerows would be replanted and enhanced following completion of works and other habitat creation and enhancement works secured by the **Outline LEMP [EN010158/APP/7.6]** and through a detailed biodiversity design to identify how Biodiversity Net Gain is achieved (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). Habitat suitable to support glow worm within the Order Limits such as hedgerows and arable field

margins would be mostly retained therefore targeted surveys for glow worm were not considered necessary and they are assumed to be present. Limited small-scale removals could be required to facilitate access or underground cabling, and the measures previously outlined will be implemented. As secured in **Outline LEMP [EN010158/APP/7.6]**, the Applicant would retain all deadwood habitat with a minimum 30m buffer to the fence line from designated sites and ancient woodland and 20m from other woodland habitat. The Applicant is also in consultation with local butterfly experts and Natural England to ensure that mitigation proposals include habitat creation targeted to support notable and protected invertebrate species and ensure ecological connectivity is maintained for all species.

The preliminary aquatic survey report (see **ES Volume 4, Appendix 7.9: Preliminary Aquatic Survey Report (2023) [EN010158/APP/6.4]**) provides a summary of characteristics of the waterbodies within the Order Limits and their suitability to support aquatic invertebrates. The embedded design principles would include a minimum standoff distance from Solar

			PV modules and associated infrastructure of 10 m from ditches, ponds, Main Rivers and ordinary watercourses. As a result, there would be no direct loss of these habitats. The implementation of standard environmental protection measures during construction, operation (including maintenance) and decommissioning to prevent pollution of these habitats, will be documented within the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.	
Lake effect	Buckinghamshire Council	Comment that the 'lake effect' is a concern and should be fully assessed due to the potential impacts on birds, bats and invertebrates. Suggestions to mitigate impact including: reducing polarised light (coating and white grid patterns), reducing the density of solar panels.	The risk of the lake effect and other impacts concerned with light polarisation have been fully assessed within the ecological assessment. However, it is important to note that modern Solar PV modules have anti-reflective coatings intended to minimise light polarisation and thereby reduce the type of effects that have been cited. In addition, individual fields with solar PV panels are broken up significantly by retained woodland and hedgerows and the associated buffers meaning that there is less potential for fauna to mistake the development as a single large expanse of water.	N

Bats:

Studies have found that the polarisation of light and reflection of sound by Solar PV modules mimics that of water and therefore bats may collide with Solar PV modules when attempting to drink from them *(Grief, F., and Siemers, S. (2017). Acoustic mirrors as sensory traps for bats. SCIENCE; 357(6355): 1045-1047)*. However, research has indicated that most interactions of this nature result in bats landing on, rather than colliding with Solar PV modules, with evidence to indicate that bats show signs of learnt behaviour following several unsuccessful drinking attempts *(Grief, F., and Siemers, S. (2017). Acoustic mirrors as sensory traps for bats. SCIENCE; 357(6355): 1045-1047 and Russo, D., Cistrone, L., and Jones, G. (2012). Sensory ecology of water detection by bats: a field experiment. PLoS ONE. 7(10): e48144)*.

Barbastelle bats almost exclusively feed on moths *(Diezt, C., and Keifer, A. (2016) Bats of Britain and Europe. Bloomsbury Publishing Plc. London)* and while a small number of UK moths have an aquatic life stage, it is considered likely that moths may be less impacted by the similarities

between polarised light from Solar PV modules and water than some other invertebrate species, minimising the impact that Solar PV module light polarisation may have on barbastelle bats. As noted above, the use of coatings to minimise the impacts of light polarisation is likely to further limited any potential impacts on the barbastelle bat prey resource. For the Proposed Development, Solar PV modules would be bifacial with an anti-reflective coating, to reduce light polarisation impacts.

Direct risks relating to collision with Solar PV modules for other bat species are considered to reflect those detailed above with regards the potential for collisions when attempting to drink from Solar PV modules. While typical flight heights vary amongst the species within this grouping, the majority of bats would fly higher than the 3.5m height of the solar panels and are therefore unlikely to be at significant risk from collision. The trawling foraging behaviour of Daubenton's bat may place it at greater risk of impact due to light polarisation from the Solar PV modules, both in relation to increased collision risks from attempting to forage over Solar PV

modules and potential changes in prey distribution and/or abundance. However, it should be noted that there are no notable sizeable waterbodies present within the Site or immediate vicinity for invertebrates to be pulled from and the use of anti-reflective coatings on the Solar PV modules is considered likely to minimise the impacts of light polarisation as detailed above. For the Proposed Development Solar PV modules will be bifacial with an anti-reflective coating, to reduce light polarisation impacts.

Invertebrates:

Invertebrates have also been found to be impacted by how Solar PV modules polarise light, resulting in the attraction of a range of invertebrate species; in particular, species with an aquatic life stage. This attraction of invertebrates to Solar PV modules could result in changes to bat prey distribution within the Site, while unsuccessful attempts to egg-lay onto Solar PV modules could have adverse impacts on invertebrate abundance and therefore bat prey availability *(Taylor, R., Conway, J., Gabb, O. & Gillespie, J. (2019). Potential ecological impacts of ground-mounted photovoltaic solar panels:*

An introduction and literature review. BSG Ecology, UK).

As stated above, many modern Solar PV modules have anti-reflective coatings intended to minimise light polarisation and thereby reduce the impact on invertebrate species. The Proposed Development has included Solar PV modules to have anti-reflective coating to reduce this risk.

Birds:

There is conflicting evidence for the abundance and diversity of bird species on solar farms in relation to surrounding areas. One study in the US identified lower bird species diversity on sites with solar panels compared to adjacent grassland, but substantially higher densities of certain species on the former *(DeVault, T. L., Seamans, T. W., Schmidt, J. A., Belant, J. L., Blackwell, B. F., Mooers, N., Tyson, L. A. & Van Pelt, L. (2014). Bird use of solar photovoltaic installations at US airports: Implications for aviation safety. Landscape and Urban Planning 122: 122-128.).*

A study by *Visser et al. (2019) (Visser, E., Perold, V., Ralston-Paton, S., Cardenal, A.C. and Ryan, P.G. (2019). Assessing the impacts of a utility-scale photovoltaic solar*

energy facility on birds in the Northern Cape, South Africa. Renewable Energy 133: 1285-1294) observed reduced abundance and diversity of bird species on a solar facility compared to adjacent land. In contrast a comparative study by *Montag et al. (2018) (Montag, H., Parker, G. and Clarkson, T. (2016). The effects of solar farms on local biodiversity: a comparative study. Clarkson and Woods & Wychwood Biodiversity.)* indicated that bird species diversity was higher overall on solar farm sites than adjacent undeveloped agricultural land, and bird abundance was higher on two of the solar farms. They attributed these benefits to the more diverse habitat providing better foraging and the availability of perching opportunities on the solar panels.

As part of the Proposed Development, the creation of species-rich grassland would provide ground-nesting bird habitat and create a nectar source for invertebrates, which in turn would provide a foraging resource for bird species. A mosaic of scrub and grassland would provide habitat to support invertebrates which would in turn improve foraging resources for birds. Research from the RSPB and University of

Cambridge as part of the Centre for Landscape Regeneration found that – hectare for hectare – solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than surrounding arable farmland. Solar farms managed with nature in mind as and in areas with a greater mix of habitats proved the best performers, having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland. This would be the case for the Proposed Development, as evidenced by the proposed embedded mitigation which includes a variety of habitats providing a mosaic of diverse habitats designed for the benefit of multiple species.

Other studies have also identified birds using solar panels for perching, shade and providing nesting opportunities.

Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies, a phenomenon sometimes referred to as the 'lake effect' effect would pose the greatest risk to migratory waterbirds, there is no evidence to directly support the 'lake effect' *(Kosciuch, K., Riser-Espinoza, D.,*

			Gerringer, M., & Erickson, W. (2020). A summary of bird mortality at photovoltaic utility scale solar facilities in the Southwestern US. PloS one 15(4): e0232034.). However, it should be noted that there are no notable waterbodies present within the Site or immediate vicinity, and breeding bird surveys and wintering bird surveys did not identify large numbers of water birds across the Site. It has also been suggested that birds which drink on the wing (e.g. swallows) may be at risk (*Bernath, B., Szedenics, G., Molnar, G., Kriska, G. and Horvath, G. (2001*). *Visual ecological impact of a peculiar waste oil lake on the avifauna: dual choice field experiments with water-seeking birds using huge shiny black and white plastic sheets. Archive of Nature, Conservation and Landscape Research 40: 1-28.; Harrison, C., Lloyd, H. & Field, C. (2017). Evidence review of the impact of solar farms on birds, bats and general ecology. Natural England, UK.),* although evidence is again lacking.	
Licensing	Buckinghamshire Council	Comment that a Natural England licence should be sought for any impact on badger setts.	Pre-construction badger surveys would be undertaken to confirm status of existing badger setts and to identify the presence of any new setts with appropriate buffers	N

			maintained to prevent disturbance or damage to setts. Pre- construction surveys are detailed within and secured by the **Outline CEMP [EN010158/APP/7.2]**. In the unlikely event that a sett cannot be avoided, then sett closure would be considered under the appropriate licensing regime.	
Local Wildlife Sites	Natural England, BBOWT	Comment that potential impacts on local wildlife and geological sites and appropriate mitigation and/or enhancement measures should be detailed within the ES.	Details of local wildlife sites have been obtained from the Buckinghamshire and Milton Keynes Local Record Centre. The assessment provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes direct and indirect effects of the Proposed Development to the qualifying features of these site and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.	N
Management plans	Buckinghamshire Council	Request that individual management plans for all veteran and ancient trees as well as non-ancient woodland and trees with potential to become veteran and ancient trees (inc. those within the hedgerows).	No veteran or ancient trees would be removed, with mitigation measures to protect trees detailed and secured in the **Outline LEMP [EN010158/APP/7.6].**	N
Management plans	BBOWT	Comment that a management regime should put in place to manage hedgerows	The Applicant has detailed how habitats would be created and appropriately	N

		as appropriate semi-natural priority habitats, with a minimum three-year rotation for trimming.	managed within the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]** and the **Outline Operational Environmental Management Plan [EN010158/APP/7.3]**. Hedgerows would be lightly trimmed every 3-5 years as required with only one side being trimmed in any one year.	
Mensuration Reports	Buckinghamshire Council	Comment that mensuration reports should be produced to ensure that the loss of timber is appropriately measured and can inform the embedded mitigation.	The design has sought to avoid any tree removals where practicable, with very limited amounts of hedgerow and tree removal required. Therefore, a mensuration report is not considered necessary for the Proposed Development.	N
Mitigation measures	Buckinghamshire Council East Claydon Parish Council BBOWT	Comment that there are insufficient measures to mitigate potential effects on breeding birds during construction. Specific comments reference the number of recorded skylark against the area of compensation plots proposed which is insufficient and plots outside of the identified parcels will likely be required to accommodate further plots.	A full assessment of potential effects of construction works on breeding birds and appropriate mitigation to remove or reduce impacts has been provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The areas where embedded mitigation has been incorporated into the design of the Proposed Development would take land out of agricultural production and seek to recreate pasture habitat that would be managed appropriately for ground nesting birds, providing continued availability of	N

			habitat for ground nesting birds, as well as suitable habitat for wintering birds during the operational (including maintenance) phase, and to improve connectivity for bird species to other areas of suitable habitat in the wider landscape. There is currently no recognised agreed approach to how much mitigation land is appropriate to compensate for loss of skylark habitat. The Applicant has based the approach on a reasonable assessment as to what areas set aside could support in terms of ground nesting bird densities. Also, whilst it is considered that ground nesting birds would not nest under panels, it is highly likely that they would continue to forage. Therefore, attention has to be paid to the mitigation measures prosed underneath panels and the margins to boost invertebrate prey, the key requirement during the breeding season, as well as provision of a winter seed source for ground nesting birds, both factors cited in their decline. It is considered that these additional measures would help support a greater density of ground nesting birds.	
Mitigation measures	Buckinghamshire Council	Comment that there are insufficient measures to mitigate potential effects on wintering birds and that the scale of the	The embedded mitigation detailed and secured by the **Outline LEMP [EN010158/APP/7.6]** includes for the	N

	BBOWT	proposed ecological mitigation areas would likely be large enough to accommodate all mitigation and compensatory measures required/ land outside of the parcels will be needed.	creation and/or improvement of species-rich grassland, scrub, hedgerows, arable field margins and woodland, resulting in an increase of suitable foraging habitat for wintering birds across the Site. On completion of Interconnecting Cable Corridor works, these areas would be available for wintering birds to use again as land would be returned to agricultural use.	
Mitigation measures	Buckinghamshire Council	Comment that mitigation and compensatory measures for badger should be agreed with Natural England.	Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing main badger setts. Pre-construction badger surveys would be undertaken to confirm status of existing badger setts and to identify the presence of any new setts with appropriate buffers maintained to prevent disturbance or damage to setts. Pre- construction surveys are detailed within and secured by the **Outline CEMP [EN010158/APP/7.2]**. In the unlikely event that a sett cannot be avoided, then set closure would be considered under the appropriate licensing regime in consultation with Natural England.	N

Mitigation measures	Buckinghamshire Council	Comment that there is an overreliance on assumptions and embedded mitigation measures which are not evidenced.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** provides a detailed assessment of the mitigation proposed including citing suitable evidence for efficacy of mitigation measures where this is available.	N
Offsets	Buckinghamshire Council	Comment that generic buffer widths are proposed without considering the ecological importance of specific boundaries. Suggestion that further surveys should inform buffer widths. Specific comments request clarification that buffers along linear features (e.g. hedgerows, watercourses) would be applied to each side.	The Applicant respectfully disagrees with this comment. Buffer widths are not generic and have been informed by both the results of surveys and through consultation with stakeholders. Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**. Solar PV modules have been removed from a number of fields as part of an overall reduction in Solar PV module area, including removal from: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation	N

corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood.

- Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane.
- Fields D27, adjacent to the eastern edge of Runt's Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI, known to support 12 Bechstein's bat maternity roosts

Instead, these fields would be used to provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood.

Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood helping to reduce potential displacement effects from Solar PV to foraging and commuting bats.

Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of Myotis activity was recorded. Early planting/habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting to improve foraging and commuting habitat for bats between woodland blocks; to improve connectivity across the Site and to the wider landscape; compensate for

hedgerows lost; improve retained hedgerows; to improve foraging, nesting/roosting habitat for birds and bats; and provide habitat for black hairstreak and brown hairstreak butterfly and other invertebrate species. In addition, a Collector Compound has been removed from Field B10, located adjacent to Sheephouse Wood (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).

The embedded mitigation detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]** also include the following:

- Perimeter fencing surrounding the Solar PV development will be offset at least 30m from existing statutory and locally designated wildlife sites.
- Perimeter fencing surrounding the Solar PV development will be offset at least 20m from all other existing woodlands, including HS2 planting

			• Perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all other existing hedgerows • Perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all existing ponds, ditches Main Rivers and ordinary watercourses. The proposed buffers have been applied to either side of the feature where these fall within the Order Limits.	
Offsets	Buckinghamshire Council	Comment that a 20m buffer around retained hedgerows (10m each side) should be provided, and that additional buffers should be provided to account for growth rates of existing and new trees within hedgerows.	Perimeter fencing surrounding the Solar PV development would be offset at least 10m either side from all other existing hedgerows than those detailed below, providing a 20m total buffer. Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood, providing a 30m total buffer. The proposed buffers would be	N

			applied to either side of the feature where these fall within the Order Limits. This is detailed within and secured by the **Outline LEMP [EN010158/APP/7.6]**.	
Optionality	East Claydon Parish Council, BBOWT	Comments that there would not be significant effects on receptors cannot be supported due to uncertainty regarding locations of electrical infrastructure. Comment that all scenarios should be assessed for their potential impacts in their own right and not the perceived worst-case scenario as what is worst case for one species may not be for another.	The parameters, as outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**, and the parameter plans presented in **ES Volume 3, Figure 3.1 – 3.4 [EN010158/APP/6.3]** and secured in the **Design Commitments [EN010158/APP/5.9]** and **Works Plans [EN010158/APP/2.3]**, set out the reasonable 'worst-case' parameters for the Proposed Development **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out those elements of the Proposed Development for which optionality is present within the design. The reasonable 'worst-case' scenario that has been assessed for biodiversity for each element of the Proposed Development where optionality is present within the design is outlined within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. This is the standard approach for assessing EIA	N

			development which seeks to maintain flexibility ahead of detailed design.	
Mitigation	Buckinghamshire Council	Comment that it is not clear how the survey work has informed the embedded mitigation measures.	Survey work has directly informed the Proposed Development design and mitigation, as has comments from stakeholders. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** details how the mitigation hierarchy has been applied with regards the Proposed Development. Given the sensitivity of the location of the Proposed Development, particularly commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field margins, woodland, hedgerows, trees, ponds, watercourses, and ditches through appropriate buffers. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent	N

ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.

Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development. Solar PV modules have been removed from a number of fields as part of an overall reduction in Solar PV module area, including removal from:

- Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood.
- Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane.
- Fields D27, adjacent to the eastern edge of Runt's Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood

SSSI, known to support 12 Bechstein's bat maternity roosts

Instead, these fields would be used to provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood.

Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11,providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood helping to reduce potential displacement effects from Solar PV to foraging and commuting bats.

Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in

		Fields E20, E11, E10 and north section of E21, where higher levels of Myotis activity was recorded. Early planting/habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting to improve foraging and commuting habitat for bats between woodland blocks; to improve connectivity across the Site and to the wider landscape; compensate for hedgerows lost; improve retained hedgerows; to improve foraging, nesting/roosting habitat for birds and bats; and provide habitat for black hairstreak and brown hairstreak butterfly and other invertebrate species. In addition, a Collector Compound has been removed from Field B10, located adjacent to Sheephouse Wood (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).

oLEMP	Natural England	Comment that the oLEMP should strongly reflect the ecological importance of the area.	Survey work has directly informed the Proposed Development design and mitigation, as has comments from stakeholders. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** details how the mitigation hierarchy and measures outlined in the **Outline LEMP [EN010158/APP/7.6]** has been applied with regards to Proposed Development. The aims of the Buckinghamshire Pilot Draft Local Nature Recovery Strategy have been incorporated into the design of the Proposed Development where possible to ensure it helps to support nature's recovery to create more, bigger, better, and joined-up habitats across Buckinghamshire and deliver wider nature-based environmental benefits. The Proposed Development has also been designed to ensure the retention and protection of all woodland, ponds, watercourses, ditches and the majority of hedgerows and arable field margins within the Order Limits. Loss of hedgerows and individual trees have been kept to a minimum with re-instatement of hedgerows undertaken in the majority of cases. The majority of infrastructure (with the exception of cabling and access tracks) is proposed to be sited on arable fields or low value grassland pasture fields which are of	N

limited value to biodiversity in comparison to retained habitats of higher value, with infrastructure located to avoid more ecologically sensitive areas. Several areas within the Site that are considered to be more ecologically sensitive have been reserved for ecological mitigations and enhancements and are not available for renewable infrastructure.

Measures have been ‘embedded’ into the design of the Proposed Development to remove potential likely significant effects as far as practicable, informed by ongoing engagement with consultees

The locations of mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network linking the Site to the wider landscape, reducing fragmentation across the wider landscape and supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting bird habitat and create a nectar source for invertebrates, which in

			turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area, providing additional bat foraging habitat and supporting GCN. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter.	
Otters	Buckinghamshire Council	Comment that there is evidence of otter at Claydon Brook and Muxwell Brook and a precautionary approach to mitigation for otter should be applied. Other comments queried why Muxwell Brook has not been surveyed for otter.	The presence of otter is noted and has been confirmed by survey work undertaken and a precautionary approach has been adopted as outlined below: To minimise disturbance to commuting and foraging otter during construction/ decommissioning, appropriate buffers between the Order Limits and Main Rivers, ordinary watercourses, ditches and ponds of 10m have been incorporated into the embedded design principles. A single holt is located along the boundary of Parcel 3. Pre-construction surveys would be undertaken to confirm active holts including further monitoring of resting places through the use of camera traps to determine use	N

			by otters, with appropriate buffers maintained to prevent disturbance and ensure legislation is complied with. This is outlined and secured in the **Outline CEMP [EN010158/APP/7.2]** and offsets are secured in the **Design Commitments [EN010158/APP/5.9].** Parcel 1a has been taken out of solar development and is a dedicated mitigation area, which would further strengthen the ecological connectivity of this area. **Figure 2** within **ES Volume 4, Appendix 7.8: Otter and Water Vole Survey Report (2023) [EN010158/APP/6.4]** shows waterbodies and watercourses within 200m of Parcels 1, 1a, 2 and 3 whilst Figure 3 shows the watercourses that were considered suitable to support otter and water vole that were then subject to further targeted surveys for these species survey.	
Policy	Environment Agency	Comment that the Proposed Development should accord with the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and Management of Hedgerows (England) Regulations 2024.	New environmental definitions in legislation in respect of planning policy and BNG are included within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** and the assessment has been undertaken in accordance with this planning policy.	N

Quantification of habitat loss and creation	East Claydon Parish Council	Query if estimates have been made of the quantitative changes in habitat have been undertaken, including loss of habitat and creation of new areas.	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** sets out how the Proposed Development would achieve a biodiversity net gain using the latest version of the Statutory Biodiversity Metric. The assessment fully details the areas and lengths of habitats as part of the baseline conditions, and also fully quantifies the areas and lengths of habitats that would be lost, created and enhanced as part of the development proposals, including the creation of *c.*95ha of fields set aside for dedicated ecological mitigation. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.	N
Priority habitats and species	Natural England	Comment that priority habitats and species are of importance for nature conservation and where impacts on these	Details of protected and notable species including those published under section 41 of the Natural Environment and Rural Communities Act 2006 have been obtained from the Buckinghamshire and Milton	N

		are considered likely data should be collected to understand this.	Keynes Local Record Centre and details of priority habitats have also been obtained. Assessments to date have included direct and indirect effects of the Proposed Development to these species and habitats and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.	
Reptiles	Buckinghamshire Council East Claydon Parish Council BBOWT	Comments on the assessment of reptiles. Comment that the baseline data for reptiles is inadequate and no specific surveys have been carried out, despite it being likely that reptiles are present within the Order Limits. Comment that it is not agreed that no significant impacts on reptiles can be concluded without sufficient survey effort and bespoke mitigation. Comment that other surveys in the area have identified large populations of grass snake.	The majority of habitat on site is considered unsuitable to support reptiles with only small areas identified that have potential to support common reptile species. The design of the Proposed Development has provided for the retention of these habitats (field margins, hedgerows, woodland and scrub). A precautionary approach to reptile mitigation has been proposed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. In addition, the habitat creation and enhancement proposals are likely to provide a significant benefit for reptiles overall. The assessment undertaken as part of **ES Volume 4, Appendix 7.7: Preliminary Environmental Appraisal (2025)**	N

			[EN010158/APP/6.4] did not identify records of large populations of grass snake within or adjacent to the Order Limits, nor did the assessment of habitat on Site identify areas of habitat that could support large populations. The Applicant would welcome the results of the studies that have identified these large populations of grass snake which would further aid the assessment for reptiles.	
Sheephouse Wood	HS2	Comment that the scale and proximity of the Proposed Development adjacent to Sheephouse Wood may impact the wider environment which the Bat Mitigation Structure has been designed to preserve.	Survey information has identified key commuting routes for bats along the boundaries of Sheephouse Wood along the southern boundary of Parcel 1 and along the boundaries of Parcel 1a. This has been reflected within the mitigation proposals that have included 30m buffers from Sheephouse Wood, 20m buffers from HS2 mitigation planting and solar infrastructure and the removal of solar development from Parcel 1a in which habitat creation to enhance the area for commuting and foraging bats can occur. Adequate mitigation is in place to ensure that there is confidence that the Favourable Conservation Status of Bechstein's bats (and other bat species) would be maintained. Much of the land	N

			over which the panels would be placed is not considered of high foraging value to bats, and there is sufficient mitigation/enhancement to result in a benefit (certainly not a negative effect). In addition, the mitigation proposals have been developed in discussion with Natural England who would need to be satisfied that the mitigation/enhancement proposals would not be detrimental and have been developed with full knowledge of the importance of the Bechstein's bats population here. In addition to the above, the Applicant has undertaken a study using paired static bat detectors confirming the importance of hedgerows for foraging bats giving confidence that the approach taken to mitigation is robust. This is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.	
SSSI expansion	East Claydon Parish Council Natural England National Trust Buckinghamshire Council BBOWT	Comments noting the potential expansion of SSSIs within Bernwood, acknowledging these are subject to change. Other comments felt that the underlying principles of the expansion should be respected despite the designation not being made yet.	The Applicant is aware that Natural England is in the process of designating a new landscape scale Bernwood SSSI. However, at the time of writing (September 2025), there is currently limited publicly information on the proposed Bernwood SSSI designation, and the date for designation is unknown. Therefore, the	N

proposed Bernwood SSSI has not been assessed as a receptor in its own right.

However, Sheephouse Wood SSSI, Finemere Wood SSSI, Grendon and Doddershall Woods SSSI, ancient woodland and Bechstein's bats and hairstreak butterflies (all of which would fall under the proposed Bernwood SSSI designation) have been assessed as part of the biodiversity assessment presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.

Therefore, the Applicant considers that the conclusions of these individual assessments can be applied to the Bernwood SSSI, should the SSSI be designated following submission of the DCO Application and before the DCO Application is determined.

Along with the approach to assessment, the design of the Proposed Development has been sensitive to statutorily and locally designated local wildlife sites. This has included removal of proposed areas for solar in Parcel 1a, the creation of buffer distances of at least 30m from all fence lines within the Proposed Development to such sites, the introduction of

			woodland/hedgerow along boundary of Fields D28/D29 linking Finemere Wood and Runt's Wood and a 20m offset from HS2 mitigation planting.	
Surveys	HS2	Query the basis on which winter bird surveys were not completed in 2023/4 and whether HS2 had been consulted.	Two assessments to determine the winter assemblage of birds were carried out over the winter periods of 2021/22 & 2023/24. Land access issues meant that access to Parcel 3 was not granted during the 2023/4 survey period and therefore this was not completed. However, the Applicant already had data for Parcel 3 from 2021/22 and from adjacent fields in 2023/24. Parcel 3 is not in any way remarkable and supported arable and improved grassland well represented elsewhere on site for which good wintering bird survey coverage was already obtained. Therefore, the Applicant holds sufficient data to support its assessment of the impacts of the scheme.	N
Traditional Orchards	Buckinghamshire Council	Comment that the status of Traditional Orchards on site should be confirmed, along with appropriate buffers and a management plan.	Based on Natural England guidance, a traditional orchard is defined as a low-density assemblage of fruit or nut trees, typically planted on grassland, meadow, or pasture that is managed traditionally without intensive chemicals or modern mechanical cultivation. While traditional orchards are most commonly associated	N

			with apples, they can include other species such as pears, plums, cherries, and nuts. Therefore, walnut trees may be considered part of a traditional orchard if planted and managed according to these principles — particularly in a mixed-species orchard with low-intensity management and biodiversity value. The plantation, particularly at the north-western end, is currently in poor condition, with many trees in visible decline. Despite this, the orchard lies well outside the footprint of any Proposed Development and would remain completely unaffected due to its significant distance (around 270m) from planned works.	
Under panel habitat	Natural England	Comment welcoming commitment to manage grassland beneath solar PV panels as flower-rich grassland or herbal ley. Request for further information about management and monitoring to be provided in the oLEMP.	Creation of herbal 'ley' habitat or similar is proposed underneath solar panels to restore soil health and create a nectar source for invertebrates, in particular pollinators, detailed in and secured by the **Outline LEMP [EN010158/APP/7.6]**. The Applicant has detailed how habitats would be created and appropriately managed within the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]** and the **Outline**	N

			Operational Environmental Management Plan [EN010158/APP/7.3].	
Water habitat	East Claydon Parish Council Environment Agency	Comment that there has been little analysis of water environments in respect of habitat and therefore no conclusions on the significance of any impacts can be made. Comment that a BNG watercourse metric and use of BNG surveyors carrying out MoRPH surveys should be included.	The preliminary aquatic survey report (see **ES Volume 4, Appendix 7.9: Preliminary Aquatic Survey Report (2023) [EN010158/APP/6.4]**) provides a summary of characteristics of the waterbodies within the Order Limits. Within the Site, land is understood to drain as overland runoff towards the areas of localised lower topographies and/or naturally infiltrate where the ground conditions allow. There are a series of drains/watercourses identified on Ordnance Survey mapping across the Site; these are predominantly unnamed headwaters and are classified as Ordinary Watercourses (those not designated by the Environment Agency as Main Rivers). No groundwater-dependant habitats are present (likely as a result of current arable management practices that have drained the land historically to make it suitable for farming). There are, however, some damper areas of grassland in discrete locations. Where these areas are located within mitigation areas, this damper habitat would	N

be retained, along with the restoration of defunct ponds. Watercourses would be retained with appropriate buffers to safeguard water quality from pollution runoff. The hydrology assessment (the results of the assessment are found within **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**) has confirmed that there are no proposals to increase drainage of the Site, with water runoff rates unaffected (i.e. greenfield runoff rates). Solar PV modules would be maintained on steel frames over a vegetative cover, with limited amounts of concrete required. Minor amounts of attenuation would be required around some infrastructure such as the Battery Energy Storage System (BESS) and substation. As such the assessment of these habitats remains the same.

River condition assessment surveys (MoRPH surveys) were undertaken in September 2023 and April 2025 and the results of the survey have been included within the BNG assessment submitted in support of the ES. Where encroachment is anticipated this has been included within the BNG assessment calculations. Measures to increase watercourse

			biodiversity units are detailed within **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment (2025) [EN010158/APP/6.4]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6].**	
Wetland	Environment Agency	Comment that the siting of the BESS should avoid wetlands, and the siting of the cable route should avoid reedbeds. Opportunity for enhancements of the existing wetland and reedbed habitats, providing further habitat for species assemblages such as wetland birds and amphibians.	All wetland habitats would be retained in their entirety with appropriate buffers surrounding these habitats, as detailed withing the embedded mitigation measures provided in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6].** In addition, the establishment of ecological ponds (restoration of former ponds and creation of new ponds) is proposed, increasing the number of ponds within the Order Limits which would strengthen the pond network and provide additional breeding habitat for GCN and foraging habitat for bats, as well as providing suitable to habitat to support wetland bird species. The Proposed Development would also provide an enhancement area along the existing Claydon Brook watercourse, with the potential to include wetter species of grassland (see **Outline**	N

			LEMP, Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]).	
Woodland	Buckinghamshire Council	Comment that a minimum 25m buffer zone should be provided for all woodlands not considered ancient woodland.	The embedded mitigation detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]** includes a minimum 20m offset from all other woodland that is not ancient woodland which exceeds Natural England's standing advice of 15m. There would be no direct land take from woodland located within or adjacent to the Order Limits and following the implementation of additional mitigation measures during construction, operation (including maintenance) and decommissioning, no direct adverse impacts are predicted.	N
Woodland	Natural England	Comment that the Applicant should identify potential opportunities to enhance and connect woodland parcels in the landscape.	The locations of dedicated mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. This has included woodland and hedgerow planting identified in strategic locations to strengthen the connectivity between existing woodland	N

			parcels. This would help to create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and foraging bats.	
Climate				
Approach to assessment	Buckinghamshire Council	Comments that the climate vulnerability assessment should better connect emissions quantification to national climate targets e.g. comparison to national, sectoral or local carbon budgets to aid understanding of how the Proposed Development aligns with UK climate goals.	Over the proposed 40-year lifetime, the operation of the Proposed Development would result in GHG savings of over 3 million tonnes CO_2e when compared to Combined Cycle Gas Turbine-generated electricity. As such the Proposed Development is considered to have a significant beneficial effect on the climate and in alignment with UK climate goals. Section 8.5 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** summarises the baseline conditions of receptors scoped into the assessment, including reference to UK carbon budgets, and **Table 8.15** compares GHG emissions from the Proposed Development to the appropriate and available UK Carbon Budget cycle within the design life of the Proposed Development.	Y

Approach to assessment	Buckinghamshire Council	Comment that there is not a clear framework for the assessment of GHG significance or comparison of the project's emissions intensity with UK grid or fossil fuel counterparts. Suggestion that an operational carbon intensity value should be calculated.	**Table 8.8** of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** sets out a clear framework for assessment of the significance of GHG emissions. This framework is based upon guidance from IEMA's Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). The climate assessment presented in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** provides a quantification of a carbon intensity value (98.9 gCO_2e/kWh) to allow comparison to Combined Cycle Gas Turbine (CCGT: 354 gCO_2e/kWh). It demonstrates that the Proposed Development would emit 255.1 g fewer CO_2e per kWh than if the same electricity were generated by a gas fired Combined Cycle Gas Turbine, representing savings of 72%. In line with IEMA (2022) guidance, any "Project [which] causes GHG emissions to be avoided or removed from the atmosphere, substantially exceeding the goals of the 2015 Paris Agreement with a positive climate impact." is considered to have a beneficial effect which is significant. It would be inappropriate to compare UK Government grid emissions factors with the	Y

			operational emissions of solar developments (which comprise emissions from activities not considered under the government methodology, such as maintenance and repair activities). However, the Applicant has included a comparison of operational emissions from the Proposed Development to the average UK grid factor in 2024 in **Table 8.17** within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**. This demonstrates that the Proposed Development is approximately 6.5 times more efficient than the current UK grid.	
Approach to assessment	Buckinghamshire Council	Comments about the study area definition, including that the atmosphere is the receptor for GHG emissions, that the reference to the UK's climate commitments should be removed and that a study area for climate vulnerability has not been defined.	The sensitive receptor for GHG emissions has been identified as the global atmosphere. The 'UK's climate commitments', referred to in **ES Volume 2 Chapter 8: Climate [EN010158/APP/6.2]** as *"UK's commitments under the UK Climate Change Act 2008 (2050 Target Amendment) Order 2019, which [is] aligned with the goals of the 2015 Paris Agreement",* is the most appropriate and relevant legislative comparison (specific to the United Kingdom) that can be associated with the impact of GHG	Y

			emissions on the global atmosphere. As such, reference to the UK's climate commitments was retained in the ES. The study area for the **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 18.2 [EN010158/APP/6.4]**) is the Order Limits.	
Emissions	Buckinghamshire Council	Comment that repair emissions are estimated to be 25% of emissions associated with maintenance, which is correct for non-MEP elements but for MEP elements repair impacts should be assumed as equivalent to 10% of A1-3 impacts for MEP.	As per RICS guidance, all repair impacts for all MEP elements are estimated as 10% of A1-3. For non-MEP, repair impacts are estimated as 25% of maintenance emissions. MEP elements include Solar PV, BESS, Transformers, Switchgear, Inverters. Non-MEP elements include PV frames and foundations, containers and substation buildings. This is set out in **ES Volume 4, Appendix 8.1: Raw data and emissions factors [EN010158/APP/6.4].**	Y
Engagement	Buckinghamshire Council	Comment that there has been little engagement on climate assessment which limits its robustness.	The Applicant has remained available to discuss the Proposed Development with stakeholders throughout the pre-application period. The Applicant commenced its Phase One Consultation in 2023, with engagement with Buckinghamshire Council ongoing to date. Discussions with the host authority on the climate assessment took place following	N

			Phase Two Consultation on 11 April 2025. A summary of stakeholder engagement, matters raised, along with how and where those matters have been addressed within the Application, is available in **Table 8.1** of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2].**	
Approach to assessment	Buckinghamshire Council	Comments on the scope of the climate vulnerability assessment, including that the scope should be clearly outlined, and that it heavily focuses on emissions at the expense of detailed reference to climate vulnerability which is against EIA regulations.	The scope of the climate vulnerability assessment is outlined in the **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**. This is aligned with EU Directive 2011/92/EU (as amended by EU Directive 2014/52/EU) that states it is appropriate to assess a project's vulnerability to climate change, and IEMA guidance (2020) that states that EIA reports must appropriately consider the climate resilience of a development scheme.	N
Approach to assessment	Buckinghamshire Council	Comment that the climate assessment should clearly reference how the Scoping Opinion has informed the assessment.	**ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]** presents the responses received in the EIA Scoping Opinion and the Applicant's response to each matter that has been raised.	N

Section 8.4 of the **ES Volume 2 Chapter 8: Climate [EN010158/APP/6.2]** summarises the receptors/matters that are scoped in and out of assessment with appropriate justification, including where relevant reference to the Scoping Opinion.

The **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]** addresses ID reference 3.3.1 of the Scoping Opinion as it presents a climate change resilience assessment for the Proposed Development.

Section 8.8 of the **ES Volume 2 Chapter 8: Climate [EN010158/APP/6.2]** addresses ID reference 3.3.5 of the Scoping Opinion as it presents the findings of the whole life greenhouse gas assessment, Table 8.12 addresses ID reference 3.3.6 of the Scoping Opinion as it directly quantifies operational energy use, and paragraphs 8.8.13 to 8.8.27 address ID reference 3.3.7 of the Scoping Opinion by demonstrating how the operational of the Proposed Development would have a beneficial effect on climate change.

Approach to assessment	Buckinghamshire Council	Comment on baseline data within the climate vulnerability assessment, including that there is no historic climate event data or extreme weather details. Request for clarification on which UKCP scenario has been used.	As set out in the **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**, the Applicant has used UKCP18 to inform its assessment of baseline climatic conditions, with paragraph 2.1.6 clarifying that the Representative Concentration Pathway 8.5 (high emissions) scenario was used. Paragraphs 2.1.5 (prevalence of calm weather/frequency of winter storms), and 2.1.7 (frequency of winter storms) discuss extreme weather considering storms, while paragraph 2.1.11 covers extreme heat. Historic climate data is presented within the Existing Baseline section, with paragraphs 2.1.2 and 2.1.3 presenting the regional climate profile and table 1 displaying the data for key climate variables dating back to 1961.	N
Approach to assessment	Buckinghamshire Council	Comments on the climate vulnerability assessment, that this should focus on climate resilience and adaption.	A **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**) forms part of the Application which sets out the likely climate change effects on the Proposed Development and outlines mitigation measures where appropriate.	N

Approach to assessment	Buckinghamshire Council	Comment that the assessment does not take into account changes in weather which may affect generating capacity of the Proposed Development (e.g. prolonged sun, increased heat).	The **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**) adopts a standard risk assessment-based methodology to identify potentially significant climate change hazards to the Proposed Development, in line with IEMA Guidance (2020). Power generation has not been scoped into assessment in line with the **Scoping Opinion (ES Volume 4, Appendix 5.2 [EN010158/APP/6.4]**). Mitigation measures embedded into the design of the Proposed Development relevant to climate resilience are outlined in **Table 5** of the **Climate Change Resilience Assessment**, and in more detail within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**.	N
Approach to assessment	Buckinghamshire Council	Comment that an In-Combination Climate Change Impact (ICCI) Assessment has not been produced.	An In-Combination Climate Change Impact Assessment has been scoped out of the assessment, in line with the Scoping Opinion (see **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]**). Further justification is provided in **Table 8.3** of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**.	N

Battery storage	East Claydon Parish Council	Comment that the Applicant should make clear how the role of the battery storage contributes to the carbon balance calculation. Comment that it would waste energy by transferring it on and off the grid and the GHG emissions from this process should be taken into account.	As outlined in the **Statement of Need [EN010158/APP/5.6]**, integration technologies such as BESS will play an essential role in achieving decarbonisation of the GB energy system, enhancing the benefits brought by low-carbon energy generation. IEMA's Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) states "activities that do not significantly change the result of the assessment can be excluded where expected emissions are less than 1% of total emissions, and where all such exclusions total a maximum of 5% of total emissions; all exclusions should be clearly stated". Given the short distance between the BESS and the National Grid, as well as the scale of emissions associated with the overall Proposed Development, emissions from this source were not anticipated to exceed 1%.	N
Decommissioning	Buckinghamshire Council	Comment that potential climate hazards and impacts in the long term have not been assessed, including at the decommissioning phase, supply chain vulnerabilities and impacts of extreme	A **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**) forms part of the Application which identifies potentially significant climate change impacts to the Proposed Development. This includes	N

		weather on the Proposed Development e.g. damage to panels.	mitigation to address supply chain risks, assessment of the decommissioning phase (noting the limitations of such assessment), the potential impact of extreme weather events on the Proposed Development and any impacts on site workers. The findings of the climate change resilience assessment are displayed in Tables 9, 10, and 11 of **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4],** corresponding to impacts on the construction phase, operation (including maintenance) phase, and decommissioning phase respectively. No impacts were identified to be significant based on the IEMA (2020) significance matrix presented in Table 8.	
Flood risk	East Claydon Parish Council	Comment disagreeing that flooding would not be affected during the construction phase.	Flood risk (including during the construction phase) has been appropriately assessed within **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**) including cross references to detailed information in the **Flood Risk Assessment** (**ES Volume 4, Appendix 16.1 [EN010158/APP/6.4]**) and **Outline Drainage Strategy [EN010158/APP/7.11]**. The assessment demonstrates that no significant effects are anticipated with	N

			regard to flooding during the construction phase.	
Flood risk	Buckinghamshire Council	Comment that the climate assessment should cross reference detailed information in the Flood Risk Assessment which could be used to justify the assessment of climate vulnerability impacts related to flood risk.	The **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**) includes cross references to detailed information in the **Flood Risk Assessment** (**ES Volume 4, Appendix 16.1 [EN010158/APP/6.4]**) and **Outline Drainage Strategy [EN010158/APP/7.11]** where relevant to climate change effects on the Proposed Development (e.g. extreme rainfall, increased winter precipitation).	N
GHG savings	Buckinghamshire Council	Comments that the calculated GHG savings are conservative as it does not include embodied carbon in the CCGT. However, the Proposed Development would most likely be replacing existing CCGT plants, for which the embodied carbon emissions have already been accounted. Comment that there would be embodied carbon emissions associated with the construction of the solar farm, which would need to be taken into account if a like-for-like comparison were to take place.	The carbon intensity value of 98.9 gCO_2e/kWh calculated for the Proposed Development includes an estimate of the embodied carbon emissions (including during construction and replacement during operation), but the comparator intensity value of 354 gCO_2e/kWh for CCGT energy is purely for the direct operational emissions and does not take into account any embodied emissions from the construction, or replacement during operation, of the CCGT. It is therefore not a direct comparison and the calculated	N

			GHG savings of the Proposed Development are conservative.	
GHG savings	East Claydon Parish Council	Comments on the Applicant's assessment of the impact of the Proposed Development on the climate including: • that the amount of carbon emitted means it would still have a negative effect. • that estimates of GHG emissions associated with production of materials and electrical infrastructure has been omitted. • that the conclusion that there would be a positive significant effect on the climate has not been justified.	The Applicant has assessed the impact of the Proposed Development on the climate in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**. This considers the predicted lifecycle GHG emissions of the Proposed Development, which includes all emissions from the construction, operation (including maintenance) and decommissioning phases, inclusive of embodied emissions from the production of materials and any infrastructure. This has been assessed against the potential GHG savings during its operation. Over the proposed 40-year lifetime, the operation of the Proposed Development results in net GHG savings of over 3 million tonnes CO_2e when compared to Combined Cycle Gas Turbine-generated electricity, which is considered to have a significant beneficial effect on the climate in line with the IEMA (2022) guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance.	N
Guidance	Buckinghamshire Council	Comment that PAS 2080 and RICS guidance are considered best practice	BS EN 15642:2021 is utilised indirectly through alignment with RICS (2023) Whole	N

		and should be utilised. Request for BS EN 15643:2021 to be utilised. Query whether Greenhouse Gas Protocol is relevant.	Life Carbon Assessment for the Built Environment, whose modular infrastructure and lifecycle stages *are 'adapted from EN 15978, EN 17472 and EN 15643'.* In 'Section 1.2 What is a Whole Lifecycle Assessment?' of the RICS guidance, it is clarified that the project lifecycle stages used are derived from *'the modular structure provided in EN 15978, EN 17472, EN 15804, EN 15643, ISO 21931 Parts 1 and 2, and ISO 21930'*. One Click LCA modelling software and its PAS 2080-aligned infrastructure tool were used during the course of the GHG assessment. The Greenhouse Gas Protocol is referenced as it provides a baseline understanding of GHG reporting. It is considered alongside the use of infrastructure specific guidance documents listed in Section 8.2 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**.	
Management Plan	Buckinghamshire Council	Comment that a Carbon Management Plan should be developed to support reductions of the project lifecycle.	The Applicant has included a number of outline management plans as part of its Application which set out measures to reduce effects on the surrounding environment, including climate.	N

This includes the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]** which outlines that materials and infrastructure would be responsibly procured, as well as the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** and **Outline Travel Plan,** which is appended to the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** and includes measures to decrease GHG emissions from the construction phase.

The maintenance and replacement of components of the Proposed Development would be carried out in accordance with the additional mitigation measures detailed and secured by the **Outline Operational Environmental Management Plan [EN010158/APP/7.3]**.

It is anticipated that additional mitigation measures specific to the decommissioning phase would broadly emulate those set out for the construction phase. These measures would be agreed closer to the time of decommissioning. An **Outline Decommissioning Environmental**

			Management Plan [EN010158/APP/7.4] forms part of the DCO Application.	
Mitigation	Buckinghamshire Council	Comments that embedded mitigation measures are generic and unquantifiable. Other comments state that mitigation measures have not accounted for impacts of climate change e.g. flood and drainage measures, exposure to extreme weather.	Embedded mitigation relevant to climate are detailed in **Table 8.9** of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**, noting that these are discussed in more detail within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. While the embedded mitigation measures were not quantified, due to the inherent difficulty of accurately quantifying such measures, this consequently results in a more conservative, worst-case scenario. Embedded mitigation measures specific to climate change resilience for the Proposed Development include the siting of electrical infrastructure in locations at low risk of flooding and/or set at the necessary minimum ground levels (see **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, and **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2**] for further detail), and the regular assessment of the condition and integrity of all assets with maintenance to be undertaken as early as required.	N

			Additional mitigation measures specific to climate change resilience are detailed for each project phase in Tables 9, 10, and 11 of the **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**).	
Optionality	Buckinghamshire Council	Comment that the climate impacts of different scenarios for the design of the Proposed Development is not discussed.	**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out those elements of the Proposed Development for which optionality is present within the design. It should be noted that the proposed locations of the Rosefield Substation and BESS were narrowed down following Phase Two Consultation. As much of the potential optionality centres around the location of the project elements specified, which has no impact on the assessment of GHG emissions, there is not necessarily a 'worst-case' scenario concerning GHG emissions for many of the project elements. Nevertheless, the reasonable 'worst-case' scenario that has been assessed for each element of the Proposed Development where optionality is present within the design is outlined within **Table 8.5** of **ES**	N

Volume 2, Chapter 8: Climate [EN010158/APP/6.2].

Construction				
Working hours	East Claydon Parish Council Steeple Claydon Parish Council	Comments that working hours are anti-social and would disturb the local community. Suggested working hours 8am – 5pm. Other comments stated that no works should take place before 8am and after 6pm.	Construction working hours on Site would occur from 07:00 to 19:00 Monday to Friday and 07:00 to 12:00 on Saturday. No working would be permitted on Sundays or Bank Holidays without prior agreement with the host authority. Between 07:00 – 08:00 and 18:00 – 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted, depending on the construction activity proposed to take place and its proximity to sensitive receptors. Applying shortened daily construction hours across the whole Site would increase the duration of the construction phase and increase the period of time over which any temporary effects from construction would occur. Further details on construction working hours and control of noise are set out in the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** and **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**.	N

			These documents also include details of best practice measures proposed to limit effects on the local community during the construction phase, including workers travelling to Site outside of peak commuting hours and the use of temporary hoarding and construction routes which would avoid local villages. During construction, the appointed contractor(s) would ensure that the impacts from construction traffic on the local community are reduced where reasonably practicable by implementing the measures set out in **ES Volume 1, Chapter 14: Transport and Access [EN010158/APP/6.2] and** secured in the **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5]**.	
General comment – construction	Buckinghamshire Council	Comments that construction would cause significant disruption to the local community, including traffic, noise and dust impacts. Other comments felt that this had not been sufficiently assessed, and effective mitigation measures had not been developed.	The **Environmental Statement [EN010158/APP/6.1 to 6.4]** has included assessment of the likely significant environmental effects resulting from the construction of the Proposed Development and considers measures to avoid, prevent, reduce or, if possible, offset any likely significant adverse effects on the environment. The proposed mitigation and	N

monitoring measures are outlined within the respective environmental factor chapters (**ES Volume 2, Chapters 6 - 17 [EN010158/APP/6.2]**).

The Applicant submits that the assessments referred to above have sufficiently assessed potential construction impacts on the local community and considers that the mitigation measures developed are effective in mitigating effects identified.

No significant traffic, air quality or noise impacts are anticipated during the construction phase of the Proposed Development. Further detail on these assessments that have been undertaken are detailed in **ES Volume 2, Chapter 6: Air Quality, Chapter 13: Noise and Vibration, Chapter 15: Traffic and Transport [EN010158/APP/6.2]**.

Measures to reduce impacts and disruption to the local community (including in relation to traffic, noise and dust) are outlined and secured within the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** and **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. For example, the

			commitment that the contractor would implement measures to control and mitigate and dust tracking onto the highway, including vehicle wheel cleaning. Additionally, a road sweeper would be deployed when required, to remove any mud and dust that has tracked onto the highway.	
HDD	Buckinghamshire Council	Comment that traditional open trenching methods should not be used due to the sensitivity of the site, with all cabling to be implemented using horizontal directional drilling (HDD). Other comments request that the locations of send and receive pits and joining bays should be away from the buffers of identified arboricultural receptors.	The Applicant does not agree that traditional open trenching methods should not be used for the Proposed Development because the Applicant has designed the cable route (including the locations of send and receive pits and joining bays) (**ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3]**) to avoid sensitive receptors such as identified arboriculture receptors. HDD would only occur when there is a requirement to cross a road or watercourse or as a mitigation measure to avoid significant environmental impacts.	N
Satellite Construction Compound	HS2	Request for more information about works involved within this area as it is close to HS2 and Sheephouse Wood.	As set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**, the potential activities occurring within the Secondary	N

			Construction Compounds include the following: • areas of hardstanding with haul road areas comprising stone laid on a geotextile membrane; • car parking; • site and welfare offices and facilities, canteens, and workshops; • area to store materials, plant, and equipment; • storage and waste skips; • area for download and turning; • security infrastructure, including cameras, perimeter fencing, security gatehouse(s) and lighting; • site drainage and waste management infrastructure (including sewerage); and • electricity, water, wastewater, and telecommunications connections.	
Consultation				
Consultation questionnaire	East Claydon Parish Council	Comments that the consultation questionnaire contained leading questions which implied there would be	The questionnaire was one method available for responding to the consultation. The Applicant does not	N

	Steeple Claydon Parish Council	positive benefits of aspects of the Proposed Development.	consider that the questions in the Phase Two Consultation questionnaire were leading and were designed to invite a broad range of comments and responses. All of the questions were optional to complete and enabled respondents to provide a freeform response. There was also a space for respondents to leave any further comments on the Proposed Development beyond the scope of the questions. A copy of the Phase Two Consultation questionnaire is available at **Appendix G-2.4** of the **Consultation Report [EN010158/APP/5.2]**.	
Information	Buckinghamshire Council	Comment that there was some missing information within the noise section of the PEIR.	Following the start of Phase Two Consultation, the Applicant identified that some information was unintentionally omitted from the PEIR. These were six figures (Figures 12.1 to 12.6) which accompanied Chapter 12: Noise and Vibration, and the figures within Appendix 7.7: Preliminary Ecological Appraisal Report 2024. Due to the minor nature of the omitted material, it was not believed that the omission would have affected the ability of	N

anyone to understand and provide feedback on the Proposed Development. However, in the spirit of government guidance on pre-application consultation, the Applicant extended the consultation period stated in the SoCC (18 September to 14 November 2024) by 21 days. This was to ensure that respondents were given the statutory 28-days to review the additional information once this was published on 07 November 2024.

On 06 November 2024, the Applicant wrote to the host authority to confirm the actions taken to mitigate this error, which are detailed below:

- Updating the electronic version of the PEIR hosted on the Rosefield Solar Farm website, as well as the physical copies of the PEIR at the deposit points to include the omitted information.
- Publishing an update on the home page of the Rosefield Solar Farm website (see **Appendix G-3.2: Screenshots of Phase Two Consultation website (7 November 2024)**).
- Adding clarification notes under the PEIR on the Rosefield Solar Farm website and under each figure to ensure

			the additional information was clearly signposted (see **Appendix G-3.2: Screenshots of Phase Two Consultation website (7 November 2024)**). • Sending links to the omitted figures directly to consultees likely to have an interest in them (e.g. the Environmental Health Officer at the host authority). • Updating digital advertising with the amended consultation deadline with links through to the Rosefield Solar Farm website to find out additional information. • Updating site notices erected around the proposed Site boundary with the revised deadline for feedback (11:59pm on 05 December 2024).	
Ongoing engagement	Anglian Water Services Historic England HS2 National Trust	Comments that the respondent welcomes ongoing engagement with the Applicant.	The Applicant is grateful to everyone who has engaged throughout the pre-application period to provide feedback on the Proposed Development and looks forward to continuing to work with interested parties throughout the lifetime of the Proposed Development.	N
Community benefit				

Community benefit	Calvert Green Parish Council East Claydon Parish Council Quainton Parish Council	Comment that there would not be benefit for the local community from the Proposed Development. Other comments made suggestions about the types of things the fund could be used for, such as EV charging infrastructure.	The Applicant intends to provide benefits for the community through the enhancement of PRoWs and permissive paths, a community fund and creating direct and indirect effects associated with employment, skills and education. The Applicant intends to promote economic benefits for the community through the activities set out in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]**. The plan describes activities that would promote access to employment, upskilling and re-skilling opportunities for local people. These could include work experience placements, access to jobs, and joint Apprenticeships across industry partners. The above Plan also includes provision for working with schools to promote career opportunities available to young people within renewable industries, including those available local to their place or residence. The Applicant is proposing to enhance the existing PRoW network and provide three new permissive paths to improve connectivity within the area and around the Order Limits. These are secured by the	N

			Streets, Rights of Way and Access Plans [EN010158/APP/2.4]. In addition, the Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The total amount of funding would be based on the final installed capacity of the Proposed Development. The Community Fund would be index linked from the first payment, with the RPI base rate linked to the operation date of the Proposed Development and reviewed annually.	
Community fund	Steeple Claydon Parish Council	Comment that the proposed community fund is insufficient.	The Applicant is proposing a Community Fund of £400 per megawatt of the final installed capacity of the Proposed Development per year. This would begin from the start of operation and lasting throughout the lifetime of the Proposed Development. The Community Fund would be index linked from the first payment, with	N

			the RPI base rate linked the operational date of the Proposed Development and reviewed annually.	
Cultural heritage				
Approach to assessment	Historic England	Comment that it is unclear why some assets (which the qualitative assessment indicates would experience impacts through changes to their setting) have been scoped out of further assessment.	The Applicant has included a Stage 1 Setting Assessment for all designated heritage assets within 5 km of the Order Limits which can be found in **Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]** and has included a Detailed Setting Impacts Assessment as part of its cultural heritage assessment to provide justification for the scoping in/out of assets. This can be found in **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]**. The Grade I and II* listed buildings, registered parks and gardens and scheduled monuments that are scoped into the assessment have been agreed with Historic England through ongoing engagement.	Y
Approach to assessment	Historic England	Comment that aerial mapping and lidar work was omitted from the PEIR.	The Applicant has produced an **Aerial Interpretation Mapping Report** (**ES**	Y

			Volume 4, Appendix 9.4 [EN010158/APP/6.4]).	
Approach to assessment	Buckinghamshire Council	Comment that the assessment should focus on heritage assets rather than the study area itself.	**Table 9.2** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** sets out the receptors scoped into the cultural heritage assessment, this list of receptors has been agreed with Buckinghamshire Council through ongoing engagement. The study area for the Stage 1 Setting Assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]**) reflects the Zone of Theoretic Visibility for the Proposed Development.	Y
Approach to assessment	East Claydon Parish Council	Comment that the Applicant has not consulted the Buckinghamshire Heritage List.	The Applicant has consulted the Buckinghamshire Heritage List (as supplied by the Historic Environment Record) and all locally listed heritage assets are included in assessment as non-designated heritage assets in **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2].**	Y
Below ground	Historic England	Comments around understanding of below ground assets, including that a	Physical impacts to known and unknown below ground archaeological remains have	Y

archaeological potential	Buckinghamshire Council East Claydon Parish Council	worst-case approach for assessing archaeological impacts is supported, that there is limited information at this stage and it is therefore difficult to agree on archaeological potential, that further information is required within the ES, including on geophysical survey methods and results of ground truthing/trial trenching and bore-hole surveys. Other comments queried why the area to the northwest of Parcel 3 has been omitted given the likely presence of extensive buried assets.	been assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**). Following Phase Two Consultation and the publication of the PEIR, the Applicant undertook pre-determination archaeological investigations in consultation with the Buckinghamshire Council. Results of these surveys and how this has informed the design of the Proposed Development (including approach to mitigation) are included within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Technical appendices accompany the chapter which contain detailed information about the details of the survey effort, including **ES Volume 4, Appendix 9.2: Geophysical Survey Report** and **Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]**. The importance of the archaeological remains investigated through trial trenching has been agreed with the host authority's archaeological advisor and Historic England as Medium. The area northwest of Parcel 3 is the area of search for the proposed replacement National Grid East Claydon Substation. It is considered that the area would be

			evaluated as appropriate by NESO. Following engagement with the host authority's archaeological advisor and Historic England, the **Archaeological Management Strategy [EN010158/APP/7.10]** provides for the results of any such evaluation to inform the detailed Written Scheme of Investigation (including post-excavation analysis and publication) for archaeological remains excavated in advance of the construction of the Proposed Development.	
Botolph Claydon Conservation Area	Historic England Buckinghamshire Council East Claydon Parish Council	Comments that the Proposed Development could adversely impact the Botolph Claydon Conservation Area and its relationship between the agricultural land to the south and east, including when viewed from Jubilee Way PRoW to the south. Specific comments that views in and out of the Conservation Area which contribute to its significance should be addressed. Comment that the changes made since Phase One do lessen the harm caused but further information is required to confirm there is no visibility from the Conservation Area and how the Proposed	The design of the Proposed Development has evolved to consider views from Botolph Claydon and the Botolph Claydon Conservation Area. Four fields closest to the Conservation Area were no longer considered for solar following Phase One Consultation and following Phase Two Consultation, these fields were removed from the Order Limits altogether. These changes have ensured that the Proposed Development is no longer visible from the Conservation Area and that the Conservation Area would continue to be experienced within a largely agricultural setting on the approaches from the west and north.	Y

	Development would appear in views looking towards the Conservation Area. Query why Botolph House has not been included in the analysis.	The Applicant has also had regard to the amenity and views from PRoWs in and around the Conservation Area. A 55m buffer between solar panels and the Bernwood Jubilee Way has been applied, with proposed planting to screen views further. Following Phase Two Consultation the Applicant shared viewpoints from Botolph Claydon Conservation Area and Jubilee Way PRoW with Historic England. Visualisations from different areas of the Order Limits and their surroundings are included in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**. This includes views from Botolph Claydon and towards Botolph Claydon from the Jubilee Way Public Right of Way. As described in the **Detailed Settings Impact Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4]**), the Order Limits are located c. 900m from Botolph House. Botolph House has been included in the cultural heritage

			assessment and the effects are concluded as being slight adverse (not significant).	
Claydon House and All Saints Church, Claydon Park	Historic England National Trust Buckinghamshire Council	Comments that the Proposed Development could adversely impact Claydon House, All Saints Church (both listed Grade I) and Claydon Park (Grade II) and its relationship with and setting within the surrounding rural landscape. Specific suggestions for the design include reinforcing the existing tree belt and hedgerow along Three Points Lane to screen visibility beneath Knowl Hill as well as removing solar panels that appear on the rise of Knowl Hill. Mitigation measures to break up massing in Parcel 2 should be implemented. Specific comments regarding the assessment of potential effects included a request for assessment of tree-lined avenue south of PG (9.6.9 DBA). A request for assessment of the impact on views from the upper floors of Claydon House and for visibility from Conduit Hill. It was also suggested that assessment of significance of views of the park and house be included alongside a request for assessment of the setting of the tower of	The design of the Proposed Development has evolved to consider the potential effects of the Proposed Development on the setting of Claydon House, All Saints Church and Claydon Registered Park and Garden, in consultation with the National Trust, Historic England and the host authority. Following Phase Two Consultation, the Applicant removed areas of proposed Solar PV panels from Fields B11 and B9 to reduce visibility of the Proposed Development from Claydon House and RPG, as well as reinforcement of the existing tree belt and hedgerow along Three Points Lane. The siting zones for the Satellite Collector Compound and the Satellite Collector Compound Transformer in Field B10 (as shown on the **Works Plans [EN010158/APP/2.3]**) have been reduced to minimize the impact on these designated heritage assets. Green corridors have been designed into the layout of Parcel 2 to break up the massing of the solar arrays as far as	Y

	the Church of All Saints if this rises above the trees as this could derive significance from this aspect of its setting. All buildings which make up Claydon House e.g. curtilage structures and outbuildings should be considered rather than just the principal building.	possible, these are shown on the **Works Plans [EN010158/APP/2.3]**. Following application of the mitigation measures, the Applicant anticipates a minor adverse (not significant) effect on the heritage significance of Claydon House & RPG during the lifetime of the Proposed Development. Where possible, the Applicant has also worked with stakeholders to develop potential enhancement measures. This includes a permissive footpath which would provide additional viewpoints of Claydon House and RPG from Knowl Hill with potential for interpretative measures. With regard to specific points raised regarding the assessment of potential effects on Claydon House & RPG from the Proposed Development: • Views along the tree-lined access route to the south of the RPG have been included in assessment as non-designated parts of parkland and post medieval field systems. • Access to views from the upper floors of Claydon House are restricted due to private ownership and the need to

protect sensitive fixtures within the house. However, the historic importance of potential views is acknowledged and has been assessed within the ES with reference to a virtual model where access was restricted.

- Views from PRoW of Claydon House referred to above have been considered as part of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. Where these are considered to be relevant to the assessment of setting these are included in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** and the detailed setting assessment included at **Annex D** of **ES Volume 4, Appendix 9.1 Archaeological Desk-based Assessment and Settings Assessment [EN010158/APP/6.4]**).
- Assessment of views from Conduit Hill has been considered in the **Detailed Setting Impacts Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1 Archaeological Desk-based Assessment and Settings Assessment [EN010158/APP/6.4]**).

			• The Church of All Saints (NHLE1214762) within Claydon Registered Park and Garden, is c.740m from the Site and is surrounded by mature trees. The Church does not derive significance from views that include the Site due to their scale and distance of the Church from the Site. This has been considered in the **Detailed Setting Impacts Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1 Archaeological Desk-based Assessment and Settings Assessment [EN010158/APP/6.4]**). • The **Archaeological Desk-based Assessment and Settings Assessment** (**ES Volume 4, Appendix 9.1 [EN01058/APP/6.4]**) acknowledges the contribution of ancillary listed buildings to the significance of Claydon House.	
General comment – cultural heritage	Buckinghamshire Council	Comment that the Proposed Development would alter the cultural landscape and this has not been addressed in the PEIR or through detailed mitigation measures.	The Applicant has assessed the effect of the Proposed Development on cultural heritage across its lifetime as detailed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Extensive engagement has taken place with heritage stakeholders such as the host authority,	Y

			Historic England and National Trust to understand areas of concern and develop appropriate mitigation measures in response. This has included, for example, further removal of panels around Knowl Hill, and the creation of a new permissive pathway to increase viewpoints of Claydon House.	
Inclusion in assessment	Historic England	Comment that three designated assets (Grade I Church of All Saints, Preceptory of the Knights Hospitallers, Associated fishponds, medieval settlement of Hogshaw and the site of the medieval church of St John the Baptist, 200m south of Hogshaw Farm and Deserted village (site of) at Fulbrook Farm) should be included in the assessment.	The effects of the Proposed Development on the setting of these three designated assets are considered within the **Detailed Setting Impact Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4]**).They have been scoped into the assessment in **ES Volume 2, Chapter 9 Cultural Heritage [EN010158/APP/6.2]** though in all cases, the harm to their significance is concluded as less than substantial and the residual effect as not significant.	Y
Knowl Hill	National Trust	Comment welcoming proposal to include public access to Knowl Hill, allowing views towards Claydon House. Request for more information about path route and maintenance and consideration	The Applicant has included a permissive pathway to Knowl Hill within the Proposed Development as shown in **Appendix 2b** of the **Outline LEMP [EN010158/APP/7.6]** which would provide additional viewpoints to appreciate Claydon House & RPG. The	Y

		of further mitigation measures to screen views and provide a walking loop with the bridleway at South Lodge.	layout of the path has been discussed with National Trust and has been designed to provide a varied experience of the Proposed Development. New hedgerow planting has been proposed where appropriate to screen views of panel areas. Following Phase Two Consultation, the Applicant has extended the permissive path to create links with other footpaths towards Steeple Claydon and Calvert. The operator of the Proposed Development (intended to be EDF power solutions UK, which forms part of the Applicant) would be responsible for maintaining the footpath during the lifetime of the Proposed Development.	
Location of Satellite Collector Compound	Historic England National Trust	Comments were received on the potential location of the satellite construction compound and impact on heritage assets. Historic England and National Trust advised that the satellite collector compound should be sited as far away as the house as possible (Parcel B10). It was also noted that B23 would be visible in the middle distance above and between vegetation when seen from Viewpoint 5 on bridleway ECL/10/2 in the parkland to the south west of Claydon	Optionality for the locations of the satellite construction compounds was reduced following Phase Two Consultation, with each potential location reduced to a single siting zone and assessed as part of the cultural heritage assessment detailed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. The Satellite Collector Compound in Parcel 1 has been sited in Field B23 (South) as shown in **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** to avoid	Y

House. Recommendation that additional screening should be included, such as a block of tree planting or a belt of poplars.

It was recommended that the proposed building should be treated like an agricultural building and that the choice of external materials could reflect those used on the farmstead nearby, e.g. profiled steel cladding with a fibre cement roof in dark grey.

significant impacts on protected species (bats). The siting zone within Field B23 has been constrained to minimize the impact on heritage assets so far as possible.

Embedded mitigation measures to soften and partially screen views of solar PV modules and the satellite collector compound from Claydon Park include infill hedgerow and tree planting along Three Points Lane and new hedgerow (advanced) planting along the eastern boundary in Field B22 and north of Field B23 (North). This is secured by the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**.

Following application of the mitigation measures, the Applicant anticipates a minor adverse (not significant) effect on the heritage significance of Claydon House & RPG during the lifetime of the Proposed Development. This includes the contribution made by views such as Viewpoint 5 on bridleway in the parkland west of Claydon House (which is correctly referenced as MCL/10/2 on **Figure 10.5b** of **ES Volume 3 [EN010158/APP/6.3]**) to the significance of Claydon House or the ability to appreciate it.

			While the exact colours and materials to be used on the exterior of the buildings and containers would be determined at the detailed design stage, **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** outlines that these would be grey or painted green in colour and rendered to suit local building styles.	
Mitigation	Historic England	Comment that archaeological investigations and proposals for mitigation should be informed by the impacts of the Proposed Development and factored into the design and CEMP.	As outlined in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**, the evolution of the Proposed Development has been informed by robust assessment of its likely potential effects on the historic environment. This has included the scope of archaeological investigations, the layout of the Proposed Development and development of appropriate mitigation measures (for example, the removal of Solar PV modules from parts of the Proposed Development and archaeological evaluation trenching over areas proposed for hard infrastructure). Further post-consent evaluation is proposed to inform the detailed design of the Proposed Development. This would be secured through the implementation of the **Archaeological Management Strategy [EN010158/APP/7.10]** and **Outline**	Y

			Construction Environment Management Plan [EN010158/APP/7.2]	
Plans	Historic England	Comment that tithe mapping for Steeple Claydon, as well as enclosure records (plans and awards) should be consulted.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.2]** includes reference to historic maps, including relevant tithe and enclosure maps. It is noted that while tithe map does exist for Steeple Claydon this is very limited in geographical extent (e.g. six small fields). Reference to consultation of the tithe map for Steeple Claydon has been included in the above assessment.	Y
Setting	Buckinghamshire Council	Comment that there should be a more detailed setting assessment which considers contributory aspects of setting and how this contributes to significance. Suggest this should be undertaken for assets expected to experience significant effects and for the nearest designated assets that have been scoped out.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the significance of relevant heritage assets. Detailed assessment has been provided for those assets with the potential to experience significant effects in the absence of mitigation, this list of assets has been agreed with Buckinghamshire Council and Historic England and includes assets that were proposed to be scoped	Y

			out during Phase One Consultation. Where possible embedded and additional mitigation measures have been included to avoid or minimise effects.	
Setting	East Claydon Parish Council	Comment that the setting of all farmhouses have a relationship to their agricultural surroundings, not just listed buildings, which provides a wider setting for such assets and therefore the impact on farmhouses in the local area may be downplayed by the Applicant.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the significance of heritage assets in turn. This includes the contribution made by the wider agricultural setting to the significance of the listed and non-designated farmhouses. Detailed assessment has been provided for those assets with potential to experience significant effects, which has included the non-designated (locally listed) Catherine Farm. The list of assets scoped into the assessment has been agreed with Historic England through ongoing engagement.	Y
Significance	Buckinghamshire Council	Comment that the contribution to significance should be assessed and discussed more in the ES e.g. a designed view along an avenue of trees along the	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the	Y

		main formal axis of a building which forms part of the building's significance.	significance of heritage assets in turn, including the contribution made by designed views. Detailed assessment has been provided for those assets expected to experience significant effects. This has included consideration of any designed views, particularly with reference to Claydon House. The list of assets scoped into the assessment has been agreed with Historic England through ongoing engagement.	
Vernacular buildings	Buckinghamshire Council	Comment that it should not be assumed that vernacular buildings do not have principal elevations or are meant to be viewed in certain ways/from certain directions historically.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the significance of all designated and non-designated heritage assets where relevant, this has included consideration of vernacular buildings and how they are or were meant to be viewed. The list of assets scoped into the assessment has been agreed with Buckinghamshire Council through ongoing engagement.	Y
Viewpoints	Buckinghamshire Council	Comment that more detail should be provided on how different views, particularly two-way views, designed	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment,**	Y

		parkland and agricultural surroundings, historically relate to heritage sites and contribute to their significance.	**Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the significance of the heritage assets in turn. Detailed assessment has been provided for those assets with potential to experience significant effects. The assessment has considered views from and to heritage assets and how designed parkland and agricultural surroundings contribute to their significance where relevant. The list of assets scoped into the assessment has been agreed with Buckinghamshire Council through ongoing engagement.	
Agreement with approach	Historic England	Comments stating agreement with the Applicant's approach to assessment. These include supporting a broad adherence to HE guidance, a staged approach in assessment of setting, ongoing monitoring of study areas and Bucks HER. The application approach was also supported in terms of using a worst case within the Rochdale Envelope for assessing potential archaeological impacts during construction.	These comments are noted. The Applicant thanks Historic England for its ongoing engagement throughout the pre-application period and looks forward to continuing to work with Historic England and other stakeholders as the Proposed Development progresses.	N

		There was agreement of the potential for enhancements to promote understanding about heritage assets in collaboration with consultees such as the National Trust.		
Approach to assessment	East Claydon Parish Council	Comment that the Applicant has restricted survey effort to development parcels and therefore does not understand potential impacts to below ground archaeological remains from cabling or creation of access tracks.	Should consent be granted, investigations would be conducted across the areas outside of the main development parcels, such as where cabling and access tracks are proposed. These works would be carried out in accordance with a Written Scheme of Investigation agreed with the host authority, as secured by implementation of the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**. This approach ensures that any impacts to currently unknown below ground archaeological remains within the cable and access track corridors are mitigated appropriately to the asset's significance. **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has considered the potential for currently unknown remains within the Order Limits including the cable and access corridors.	N

Approach to assessment	East Claydon Parish Council	Comment that it is not accepted that all heritage assets in Botolph and East Claydon are of 'Low' importance, including St Mary's Church and MBC1099 & MBC3131.	It is noted that the EIA terminology used to discuss importance and significance is technical and does not seek to capture community value of and interests in an asset. The importance of a heritage asset in EIA terms is the overall value assigned to it reflecting its statutory designation, or, in the case of non-designated assets, the professional judgement of the assessor. Locally listed heritage assets as well as undesignated heritage assets of Local importance are considered of Low importance in EIA terms unless they have special characteristics that merit a higher level of importance. In some cases, where categorised as both an undesignated and designated asset, the value of an asset may be assigned separately for each record type within the report data. The cultural heritage assessment has considered the highest value of each receptor as detailed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** This has been prepared by a competent expert as outlined in **ES Volume 4, Appendix 1.1: Statement of Competence [EN010158/APP/6.4]**.	N

Assets within study area	Buckinghamshire Council	Request for total number of non-designated and designated heritage assets within the Order Limits and 1km study area.	**Section 9.5** of **ES Volume 2, Chapter 9: Cultural Heritage [EN01058/APP/6.2]** sets out the existing cultural heritage baseline, including the requested information. There are no designated heritage assets within the Order Limits and a total of 26 currently known non-designated heritage assets within the Order Limits. There are 71 designated heritage assets and 14 7non-designated heritage assets (comprising below ground and earthwork archaeological remains, locally listed buildings and non-listed buildings) within 1 km of the Order Limits.	N
Below ground archaeological potential	Buckinghamshire Council	Request for trial trenching programme to be 4% in areas with either good geophysics results or infrastructure (or both) and 2% in areas of both low geophysics results and low impact areas (i.e. arrays).	Following Phase Two Consultation and the publication of the PEIR, the Applicant undertook pre-determination archaeological investigations in consultation with the host authority at a 4% sample rate. Results of these surveys and how this has informed the design of the Proposed Development (including approach to mitigation) is included within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Technical appendices accompany the chapter which contain detailed information about the	N

			details of the survey effort, including **ES Volume 4, Appendix 9.2: Geophysical Survey Report** and **Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]**. Should consent be granted, post-consent evaluation would be undertaken in agreement with the host authority and in accordance with a Written Scheme of Investigation. The results of this evaluation would inform the detailed design of the Proposed Development and any mitigation measures (for example, the use of low impact foundations for solar PV modules within areas of archaeological interest). The scope of post-consent evaluation is set out in the **Archaeological Management Strategy [EN010158/APP/7.10].**	
Below ground archaeological potential	Historic England	Comment that if the Proposed Development would reduce levels of soil moisture or alter soil chemistry (pH and redox potential) in areas with potential for waterlogged/anoxic remains (archaeological and paleo-environmental), a hydrogeological model may be necessary to inform design and mitigation.	Potential impacts on soil moisture and chemistry and mitigation measures to limit those impacts are included in the **Outline Soil Management Plan [EN010158/APP/7.7**]. The potential for waterlogged/anoxic archaeological remains will be included within post-consent archaeological evaluation. The requirement for further archaeological work would be	N

			secured by the implementation of the **Archaeological Management Strategy [EN010158/APP/7.10]** which would in turn be secured by a DCO requirement.	
Below ground archaeological potential	Buckinghamshire Council	Comment that the collector compounds are assumed to have the same effect on unknown archaeology regardless of their locations and this should be explained in relation to different temporary or permanent setting impacts on other assets.	Following Phase Two Consultation and the publication of the PEIR, the Applicant undertook pre-determination archaeological investigations in consultation with the host authority. This included trial trenching in the proposed siting zones of the Collector Compounds which has informed the cultural heritage assessment detailed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** and the design of the Proposed Development. The assessment of both temporary and permanent setting impacts has been considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**.	N
Bernwood Farm	Buckinghamshire Council	Comment that development around Bernwood Farm should be avoided as it would annex historically related features.	Bernwood Farm is not identified as a heritage asset within **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]** and is not locally listed, although Weir Cottage which lies within the farm complex is Grade II listed. Bernwood Farm has been	N

			considered as part of the **Residential Visual Amenity Assessment** (**ES Volume 4, Appendix 10.5 [EN010158/APP/6.4]**) which confirms that the offset of above ground infrastructure from the property is a minimum of 180 metres. Therefore, the setting of Bernwood Farm would be preserved, as would the relationship between the buildings within the farmyard. The consideration of all heritage impacts, including setting impacts to Grade II listed Weir Cottage, which lies within the immediate farm complex, is provided in **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2].**	
Conservation areas	Buckinghamshire Council East Claydon Parish Council	Request for more information in the ES on designated conservation areas and appraisal of impacts/understanding of their character.	Appraisals of relevant Conservation Areas are included in the **Stage 1 Settings Assessment** (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]**) and **Detailed Settings Impact Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4]**).	N

Construction	Buckinghamshire Council	Query whether additional mitigation of noise, visual disturbance, traffic and compounds would be employed to reduce setting impacts.	**Table 9.9** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** sets out the likely effects on receptors during construction without additional mitigation – including those relevant to setting. **Table 9.12** sets out the additional mitigation proposed for identified cultural heritage impacts during the construction phase. This includes the routing of construction vehicles away from sensitive areas, including Botolph Claydon and Orchard Way, to reduce the impact of traffic flows on the contribution of setting to the significance of heritage assets. These measures would be secured in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. More broadly, the Applicant has submitted an **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** as part of the Application. This sets out a range of measures to limit the effects of the construction phase on the surrounding environment including effects of noise. Measures relevant to cultural heritage are detailed in **Table 3.4**.	N

Enhancements	Buckinghamshire Council	Comment that the host authority would welcome consultation on potential heritage enhancements.	The Applicant has identified potential opportunities for enhancement to the historic environment, such as interpretation measures and the permissive route to Knowl Hill to provide additional viewpoints to Claydon House and RPG in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Should consent be granted, the Applicant would work with the host authority and other heritage stakeholders to develop these opportunities in more detail.	N
Funding	Historic England	Comment supporting the Applicant's intent to exploring whether a heritage gain, in the form of a contribution, could assist Claydon in securing its long-term future.	The Applicant has identified potential opportunities for enhancement to the historic environment, including assistance to the National Trust to implement sustainable transport measures at Claydon House in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Should consent be granted, the Applicant would work with National Trust and other heritage stakeholders to develop these opportunities in more detail.	N
General comment – cultural heritage	East Claydon Parish Council	Comment that the potential harm to heritage assets has been underestimated.	The Applicant has provided a robust assessment of the potential effects of the Proposed Development on cultural heritage in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**.	N

			Where this has identified potentially significant adverse effects upon heritage assets and where possible, appropriate mitigation measures to avoid, reduce, mitigate or offset these effects have been proposed.	
Guidance	Buckinghamshire Council	Query relevance of Historic Buildings and Ancient Monuments Act 1953 and the National Heritage Act 1980.	The Historic Buildings and Ancient Monuments Act 1953 authorises Historic England to compile a register of 'gardens and other land' situated in England that appear to be of special historic interest. This is the statutory basis of the Register of Parks and Gardens which includes Claydon Park. The National Heritage Act 1980 created the Historic Buildings and Monuments Commission (HBMC) now Historic England and gave it the remit of managing the historic built environment of England.	N
Historic landscape	Historic England	Comment that the assessment of the historic landscape is weak and potential medieval colonisation of the landscape needs to be confirmed and the impact upon that landscape and setting from the Proposed Development assessed.	Assessment of the changes to the setting of post-medieval field systems from the Proposed Development has been completed as part of **ES Volume 2, Chapter 9; Cultural Heritage [EN010158/APP/6.2]**. The landscape and field systems have evolved considerably since the medieval period, but the report	N

			has identified field systems comprising below ground and earthwork ridge and furrow associated with distinct areas of medieval settlement. The impact on these heritage assets is also included within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. The impact on historic landscape character and setting is assessed in the **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4]**.	
Middle Claydon Conservation Area	Historic England East Claydon Parish Council	Comment that the Proposed Development could adversely impact the Middle Claydon Conservation Area.	The Applicant has assessed the likely setting impacts on the Middle Claydon Conservation Area from the Proposed Development in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Following the application of mitigation measures, no significant residual effects on the setting of the Conservation Area from the Proposed Development are anticipated.	N
Mitigation	Historic England	Comment that embedded mitigation measures to safeguard unknown undesignated heritage assets of national importance should be outlined.	Relevant embedded mitigation measures are outlined in **Table 9.8** in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Additional mitigation measures to safeguard unknown undesignated heritage assets during	N

			construction, operation (including maintenance) and decommissioning are set out in **Tables 9.12** to **9.14** in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. These include post-consent archaeological evaluation to inform detailed design and mitigation measures, use of non-intrusive foundations for solar PV modules, and archaeological investigation. The Applicant would secure these measures through the **Archaeological Management Strategy [EN010158/APP/7.10]**.	
Mitigation	Buckinghamshire Council	Comment that additional mitigation during the construction phase, such as noise and visual impact, is needed.	Additional mitigation measures proposed during the construction phase relevant to cultural heritage are included in **Table 9.12** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. This includes the routing of construction traffic away from Botolph Claydon and Orchard Way to reduce impacts on the setting of heritage assets through noise, vibration, dust and visual effects. Mitigation measures to limit effects on cultural heritage assets during construction are also detailed and secured in the **Outline Construction Environment Management Plan [EN010158/APP/7.2]**	N

			(**Table 3.4**). This includes controls on hours of work as well as controls on dust and noise from activities and vehicles that might impact on cultural heritage assets.	
Non-designated assets	East Claydon Parish Council	Comment that all but one of the non-designated heritage assets has been dismissed which represents a fundamental lack of understanding of their importance. Specific reference made to the Mushroom Shelter.	The Applicant has provided details of non-designated heritage assets within the study area in **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex B: Gazetteer [EN010158/APP/6.4]**. The potential effects of the Proposed Development on the setting of these assets is assessed in **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]**. The Mushroom Shelter has been considered as part of this as a locally listed heritage asset. Non-designated heritage assets are either scoped into or out of further assessment depending on the potential impacts on their significance through changes to their setting as a result of the Proposed Development, rather than solely because of their level of significance or importance.	N

Setting	Buckinghamshire Council	Comments that setting impacts, including screening measures, may affect the visibility and character of heritage sites is essential including annexing impacts, loss of connectivity between historic hunting areas of woodland, historic avenues of trees. Comment that blanket statements about impacts on 'rural character' fail to capture the specific historical and visual contributions of individual landscape elements to the understanding and significance of heritage sites. Specific comment made to Claydon House and the historic land ownership parcels.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** follows Historic England guidance Good Practice Advice Note 3 (GPA3) on assessment of setting. Historic land ownership and landscape elements are assessed and included in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. The **Detailed Setting Assessment** (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]**) includes consideration of how historical and visual contributions of individual landscape elements contribute to the understanding and significance of heritage assets, this has included consideration of screening and the relationship between Claydon House and surrounding land parcels, connectivity between assets and the rural character of the study area. The assessment has also considered potential annexing impacts, and loss of connectivity between woodland and historic avenues of trees which are also considerations for ecological mitigation as detailed in **ES**	N

			Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].	
Setting	Buckinghamshire Council	Request to clarify on the term 'setting changes' to better capture the variety of potential impacts e.g. severance.	The setting assessment (**Annex C and D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]**) has followed appropriate guidance on assessing cultural heritage as set out in the CIFA/IEMA/IHBC document "Principles of Cultural Heritage Impact Assessment" and Historic England's Good Practice Advice Note 3 (GPA3). Potential impacts caused by severance (of a heritage asset from other assets or land parcels which contribute to its significance) have formed part of the assessment of effects resulting from changes to the setting of heritage assets. This is particularly relevant to the assessment of effects for Pond Farmhouse (grade II listed building) and to Claydon House (grade I listed building) & RPG.	N
Visibility from heritage assets	Edgcott Parish Council	Comment that the Proposed Development would be highly visible from a large number of nearby heritage assets and would negatively affect how they	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment, Annex C and Annex D [EN010158/APP/6.4]** has considered the contribution made by setting to the	N

		would be viewed. Specific reference made to Claydon House.	significance of the heritage assets in turn, including the contribution made by group value. Detailed assessment has been provided for those assets with potential to experience significant effects. The design of the Proposed Development has responded to this assessment and has sought to reduce adverse effects on heritage assets, including Claydon House.	
Written Scheme of Investigation	Buckinghamshire Council	Comment that a detailed Written Scheme of Investigation is required to secure appropriate evaluation and mitigation prior to construction and decommissioning works to avoid impacts.	The **Archaeological Management Strategy [EN010158/APP/7.10]** includes provision for detailed Written Scheme(s) of Investigation for further evaluation and archaeological mitigation to be agreed with Buckinghamshire Council prior to construction works commencing. Potential impacts to archaeological remains during operation (including maintenance) and decommissioning works are considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** Appropriate mitigation measures are included within the **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. This includes measures to protect any archaeological remains that are preserved in situ at	N

			construction during the subsequent phases of the development.	
Cumulative effects				
Approach to assessment	Buckinghamshire Council East Claydon Parish Council	Comments on the long-list of projects considered, including that the list should be revisited ahead of submission to reflect the most up to date information and that projects are missing. Specific reference made to Statkraft BESS omitted at PEIR stage.	The long and short list of developments that has been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** has been updated since the PEIR ahead of submission of the Environmental Statement, which includes the Statkraft BESS (East Claydon Greener Grid Park). The Statkraft BESS (East Claydon Green Grid Park) did not form part of the long or short list of developments assessed at the PEIR stage as there was insufficient information publicly available at that time. The long list of developments is presented in **ES Volume 3, Appendix 17.1 [EN010158/APP/6.3]** which sets out the list of developments considered at stage 1 and 2 of the cumulative assessment along with information on the distance from the Proposed Development, overlap in temporal scope and the scale and nature of the development. The short-list of developments that has been considered within the cumulative effects assessment are included in Table 17.3 of **ES Volume**	Y

			2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].	
Biodiversity	Calvert Green Parish Council East Claydon Parish Council Steeple Claydon Parish Council Land interest BBOWT	Comments regarding potential cumulative effects on ecological designations, existing wildlife and habitats. Specific reference made to impacts on bats from the Proposed Development and construction of HS2 and EWR, including areas around Parcel 1a (Sheephouse Wood and Decoypond).	There are several other existing developments and/or approved proposed developments within 10km of the Proposed Development which would result in the loss of agricultural land that could support ecological receptors such as ground-nesting birds and foraging bat species. However, the majority of these are located a considerable distance from the core sustenance zone and home range for Bechstein's bats which is centred on the cluster of woodlands adjacent to the Order Limits (which include Sheephouse Wood and Decoypond Wood). Therefore, it is considered unlikely for there to be inter-project cumulative effects with regards to Bechstein's bats. The majority of the additional proposed developments include habitat creation proposals likely to be of some benefit to other foraging bats species, again reducing the potential for inter-project cumulative effects. An assessment of cumulative effects on biodiversity is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.	Y

Agricultural land	Edgcott Parish Council	Comment that there would be a cumulative loss of farmland due to the Proposed Development and others in Buckinghamshire.	An assessment of cumulative effects, including cumulative loss of agricultural land, is detailed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. This assessment demonstrates that there would be no residual inter-project cumulative effect on agricultural land.	N
Ancient woodland	Buckinghamshire Council East Claydon Parish Council	Comment that the cumulative effects on Ancient Woodland should be explained, with additional buffers for these within the embedded mitigation. Request for all ancient woodlands within and adjoining the Order Limits to be considered.	Assessment of potential cumulative effects of nearby developments in relation to the Proposed Development is included in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. Where potential cumulative effects have been identified, mitigation measures have been incorporated within the design of the Proposed Development to offset these potential effects, including on ancient woodland. Specific mitigation measures in relation to ancient woodland include a 30m offset between perimeter fencing surrounding the Solar PV panels and existing ancient woodlands (secured in the **Design Commitments [EN010158/APP/5.9]**), as well as the commitment for no ancient woodland to be removed as part of the Proposed Development.	N

Climate	East Claydon Parish Council	Comment that the cumulative impact of the vast quantities of heat emitted into the local atmosphere from projects should be assessed.	**ES Volume 1, Chapter 8: Climate [EN010158/APP/6.1]** assesses the impact of GHG emissions arising as a result of the Proposed Development on the climate in line with industry guidance. Microclimate impacts are not considered within the ES as it is anticipated that there would be no impact to local temperatures as a result of the Proposed Development. In relation to other developments considered within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which are within a 10km radius to the Proposed Development, it is anticipated that would be no impact to the heat emitted into the local atmosphere from these developments in combination that would cause any changes to local temperatures.	N
Flood risk	East Claydon Parish Council	Comment that cumulative projects in the area would increase flood risk.	The cumulative impacts of nearby developments in relation to the Proposed Development is included in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].** This assessment concludes that there are not anticipated to be any residual inter-project cumulative effects on flood risk.	N

Glint and glare	Buckinghamshire Council	Comment requesting clarification of how cumulative effects have been considered in relation to glint and glare from solar PV.	Cumulative effects from different solar PV areas and from other solar PV projects near the Site have been considered. Other solar PV projects near the Site have been identified in Section 7 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**. Effects on receptors in Section 9 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** consider cumulative effects from different solar PV areas. Cumulative effects from other solar PV projects near the Site are described in **Section 10** of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4].**	N
Interfaces	East West Rail Company	Comment that there is potential for EWR Co to seek a connection to the replacement East Claydon Substation, but this is not affected by the Proposed Development.	The Applicant thanks the East West Rail Company for its response and notes the potential future connection to the replacement East Claydon Substation. Should further discussions be required regarding the Proposed Development, the Applicant would be happy to meet with EWR Co.	N
Soil	Buckinghamshire Council	Comment that the cumulative effects assessment lacks sufficient information	A detailed cumulative effects assessment has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative**	N

	East Claydon Parish Council	and detail on potential intra-project and inter-project effects. Specific comments reference impact on biodiversity and carbon through destruction of soil.	**Effects [EN010158/APP/6.2].** This includes an assessment of potential intra and inter project cumulative effects on all environmental factors, including biodiversity, carbon and soil. This concludes that there are a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity including a potential significant effect on Bechstein bats. No significant inter-project cumulative effects are anticipated on carbon or soil.	
Landscape and visual	East Claydon Parish Council	Comment that cumulative landscape and visual impacts with other proposed schemes are of high importance and should be considered in detail.	An assessment of the inter-project cumulative landscape and visual effects with other existing development and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. This provides a detailed assessment of the cumulative effects of six other existing development and/or approved developments. The assessment has concluded significant inter-project cumulative effect on Local Character Area 5.7: Hogshaw Claylands and 7.3: Claydon Bowl, Bernwood Jubilee Way and PRoW between Botolph Claydon and Runt's Wood during the construction,	N

		operation (including maintenance) and decommissioning phases of the Proposed Development with East Claydon BESS, East Claydon Greener Grid Energy Park, Tuckey Solar Farm, East West Rail and Longbreach Solar Farm. There are also significant inter-project cumulative effects anticipated on the North Buckinghamshire Way and the Midshires Way during the construction and decommissioning and at both Year 1 and Year 10 of the operation of the Proposed Development and significant inter-project cumulative effects on Sion Hill Farm at both Year 1 and Year 10 of the operational phase of the Proposed Development. There are also significant inter-project cumulative effects anticipated on the Local Character Area 9.2: Quainton Hill and Swan's Way/Outer Aylesbury Ring during the operational phase of the Proposed Development. During the construction phase, and at Year 1 of operation, there are anticipated to be significant inter-project cumulative effects on Granborough, PRoW between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road and PRoW between East

			Claydon/East Claydon Road from the Proposed Development and the East Claydon BESS development. A summary of the landscape and visual inter-project cumulative effects is detailed in Table 17.13 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.	
National Grid Substation	East Claydon Parish Council	Comment that the Proposed Development and the replacement East Claydon Substation are intrinsically linked.	Solar farms of the Proposed Development's scale need to connect into the National Grid to supply the electricity they generate to homes and businesses. The Applicant has secured a 500MW grid connection agreement with National Grid at East Claydon Substation. There would also be capacity to import power from the network. The East Claydon Substation, which was originally built in the 1960s, is coming towards the end of its useful life. It also needs to be replaced to meet National Grid's commitments to new connections at this location (of which the Applicant's connection would be less than 10% of the proposed capacity). Therefore, the replacement East Claydon Substation and	N

			upgrade would be occurring regardless of the Proposed Development.	
Noise	Buckinghamshire Council	Comment that potential cumulative effects from a noise and vibration perspective needs more attention as this could result in significant impacts on surrounding residential amenity. Other comments request inclusion of noise impacts on PRoW users in the context of other projects.	Potential cumulative effects relating to noise and vibration have been considered in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**. Consideration has been given to the noise impacts on PRoW within/adjacent to the Order Limits. Cumulative effects from other developments on users of PRoW are not anticipated to be any greater than that presented for the Proposed Development in isolation (see **Section 13.8** of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**).	N
Noise	Buckinghamshire Council	Comment that noise and its effect on landscape character and enjoyment of PRoW should be considered in the context of cumulative effects.	Consideration has been given to potential noise impacts on PRoW within and adjacent to the Order Limits and on landscape character and PRoW. Cumulative effects from other developments on users of PRoW are not anticipated to be any greater than that presented for the Proposed Development in isolation (see **Section 13.8** of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]).**	N

			Cumulative effects from other developments considering landscape character and the enjoyment of PRoW has been considered and a detailed assessment from a population and landscape and visual perspective is included in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	
Population	East Claydon Parish Council	Comment that only one receptor (PRoW) is considered under the 'Population' heading and this demonstrates a lack of understanding on the cumulative impact on local communities.	Several receptors are considered under the 'Population' heading including community access (relating to a number of PRoW), tourism and the tourist economy, tourist accommodation, agricultural economy, local businesses and landholdings and community facilities. A detailed assessment on population receptors is provided in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** and an assessment of the cumulative effects on population is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	N
Relationship with projects in the area	East West Rail Company	Comment that it is not anticipated that there would not be any potential cumulative effects from East West Rail and the Proposed Development.	The Applicant does not anticipate that there would be any residual inter-project cumulative effects with East West Rail as detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	N

Relationship with projects in the area	Edgcott Parish Councilc Calvert Green Parish Council East Claydon Parish Council Quainton Parish Council	Comments that there would be a cumulative effect of the Proposed Development and other projects in the area and this has not been addressed in any depth. Specific references to HS2, EWR, Tuckey Farm, the replacement East Claydon Substation and East Claydon Greener Grid Park.	A detailed cumulative effects assessment has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].** This assessment considers HS2, EWR, Tuckey Farm, the proposed replacement National Grid East Claydon Substation and the proposed East Claydon Green Grid Park, alongside several other developments that form part of the short list of developments (as outlined in **Table 17.3** of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**) that have been assessed.	N
Traffic	Edgcott Parish Council Calvert Green Parish Council Winslow Town Council	Comment that the disruption caused by other projects in the area (HS2, EWR, HMP Grendon Underwood) would be exacerbated by the Proposed Development. Specific comments mention the condition of local roads, damage to vehicles, road closures, lack of enforcement of management plans. Others raise the need to coordinate timetables for delivery of AILs.	A detailed cumulative effects assessment has been undertaken and is provided in the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which includes an assessment on transport and access on local roads**.** This assessment concludes that there are not anticipated to be any intra-project transport and access cumulative effects. This assessment considers HS2, EWR, HMP Grendon Underwood, alongside several other developments that form part of the short list of developments (as outlined in **Table 17.3** of **ES Volume 2,**	N

Chapter 17: Cumulative Effects [EN010158/APP/6.2]) that have been assessed.

With regard to the specific comments raised:

- A Wear & Tear Agreement to address concerns around road condition is provided in the **Outline Construction Traffic Management Plan (oCTMP) [EN010158/APP/7.5].**
- The Wear & Tear Agreement would reduce the potential for damage to vehicles on the public road network.
- No road closures are proposed.
- The traffic management requirements are detailed in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** The CTMP would be provided to the Principal Contractor and they would be required to abide by these regulations as part of their commercial contract with the Applicant. Failure to follow the traffic management measures proposed would be a non-compliance matter and could result in contractors being subject to

			penalties and individual sanctions. Failure to observe the CTMP would also be a breach of the DCO.	
Traffic	East Claydon Parish Council	Comment that cumulative increases in baseline traffic flows associated with other projects in the area have been used to minimise percentage increases in vehicle movements.	**Appendix 15.1: Transport Assessment [EN010158/APP/15.1] Section 4.10** has been undertaken in line with longstanding and agreed transport planning guidelines to estimate the potential for traffic impacts on the access routes, noting that the only route affected by committed development traffic is the A41.	N
Traffic	Buckinghamshire Council	Comment that the Light Duty Vehicle (LDV) and Heavy-Duty Vehicle (HDV) modelling data will need to be updated in the ES to demonstrate that the predicted number of HGV movements during the construction programme will be considered cumulatively with other existing and/or approved developments.	Committed development traffic flows (including both LGV and HGV committed traffic) have been included in the impact assessment noted in **Appendix 15.1: Transport Assessment [EN010158/APP/15.1].** No significant cumulative effects are predicted as a result of this transport assessment.	N
Decommissioning				
Cabling	Natural England	Comment that it is suitable to leave underground cabling in-situ at an appropriate depth (minimum 900mm) to avoid any impacts on agricultural practices.	The Applicant notes this comment. Cabling is expected to be laid at a depth of 1.5m BGL, except in areas where utility (0.5m), road (1.5m), or ditch (2m) crossings may be required. For more information, please see **ES Volume 1, Chapter 3: Proposed**	N

			Development Description [EN010158/APP/6.1]. All the below-ground cables below 1m would be left in situ following decommissioning, however, this would be dependent upon the legislation and industry standards at the time.	
Design				
Botolph Claydon	Granborough Parish Council	Comment that the Proposed Development is too close to Botolph Claydon.	The design of the Proposed Development has been guided by the Project Principles set out with the **Design Approach Document [EN010158/APP5.8]**. This includes considering the amenity of Botolph Claydon (Principle 2.2). The fields closest to Botolph Claydon were not considered for solar PV development at Phase One Consultation and were removed from the Order Limits altogether prior to the Phase Two Consultation. In addition, following Phase Two Consultation the potential to locate the Rosefield Substation and larger scale infrastructure within Field E23 was discounted, with Solar PV modules now only proposed in E23 and the Main Collector Compound (to 6m) in E21-22 as outlined in **ES Volume 3, Figure 3.1:**	Y

			Height Parameters [EN010158/APP/6.3]. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports at most moderate adverse (not significant) residual effects. Therefore, no significant adverse effect are reported on the visual amenity of residents of Botolph Claydon or any other settlement in the Order Limits.	
Cabling	East Claydon Parish Council	Comment that the indicative cable routes are vague which prevents feedback.	Following Phase Two Consultation, the Applicant has further refined the location of the proposed cable route between each parcel and to the point of connection. The cabling corridors, both for the grid connection and between each parcel, continue to be shown as corridors to allow flexibility. This includes the ability to adapt to the final configuration of National Grid's proposed replacement East Claydon Substation, respond to ground conditions and/or any new protected species identified during pre-construction surveys as required by the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]**. The current likely	Y

			route for each cabling corridor is shown in **Figure 3.7 Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3.]**, which again would be subject to further refinement at the detailed design stage. Cabling Corridors would run alongside access tracks where practicable to avoid wider excavations, which is secured in the **Design Commitments [EN010158/APP/5.9]**.	
Changes since Phase One Consultation	Edgcott Parish Council	Comment that the changes made to the Proposed Development do not allay the concerns of the local community.	The Applicant has made extensive changes to the design of the Proposed Development over the pre-application period, in part to reduce effects on the local community. Between Phase One and Phase Two consultations, the Applicant reduced the area proposed for solar PV to 279ha (from 448ha identified as potentially suitable for solar development at Phase One Consultation). Following the Phase Two Consultation, additional changes were made to the Proposed Development in response to comments received from the local community, which included:	Y

			• increasing offsets from residential properties at Calvert Cottages and Catherine Cottages; • refinement of cable corridors to give increased certainty on their location; • refinement of Collector Compound locations; • refinement to a single location for Rosefield Substation and the BESS; • additional permissive footpath links to tie into the current rights of way network; and • refinement of the green and blue infrastructure proposals to provide greater detail on the locations of proposed planting. More information about how the design of the Proposed Development has evolved over the pre-application period is available in the **Design Approach Document [EN010158/APP/5.8]**.	
Cultural heritage	Historic England	Comment that the design of the Proposed Development and design principles should be informed by detailed	Understanding of the historic environment has influenced the design of the Proposed Development throughout the pre-application period.	Y

		understanding and assessment of impacts on heritage assets.	An assessment of the likely effects of the Proposed Development upon cultural heritage is presented in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/5.8]**. Information on how the design of the Proposed Development has responded to the outputs of this assessment, as well as extensive ongoing engagement with stakeholders is detailed in the **Design Approach Document [EN01058/APP/5.8]**. This includes how the design has evolved in response to consider and, where possible, enhance views to and from Claydon House & RPG. Following Phase Two Consultation, the Applicant removed areas of proposed Solar PV modules from Fields B11 and B9 to reduce visibility from this asset, as well as reinforcement of the existing treeline and hedgerow along Three Points Lane. The siting zone for the Satellite Collector Compound within B23 has been reduced to minimise the impact on this asset.	
Green Infrastructure	East Claydon Parish Council	Comment that optionality in the design prevents understanding of how green corridors would be impacted.	Following Phase Two Consultation, the Applicant has refined the design of the Proposed Development. This includes treatment of green corridors, with	Y

measures proposed to protect existing corridors and create new ones between important habitats. The proposed cable routes between each parcel and to the point of connection have also been refined to reduce effects on green corridors, trees and ecological features. **Appendix 1 - Green and Blue Infrastructure Parameters** and **Appendix 2 - Landscape and Ecological Mitigation and Enhancements** to the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]** secure the green infrastructure parameters that would be delivered by the Proposed Development.

Offsets from key landscape and ecological features within and surrounding the Site are set out at **Table 3.16** of **Chapter 3** to the **Environmental Statement [EN010158/APP/6.1]**. These would be secured by the **Design Commitments [EN010158/APP/5.9]**. Following Phase Two Consultation, these offsets have been increased in the following locations:

- Width of offset between Finemere Wood and Runt's Wood increased to 30m from 20m, to enhance connectivity for bats

			• Width of offset along hedgerows between Shrubs Wood, Sheephouse Wood and Decoypond Wood (in fields B3, B6 and B7) increased to 15m from 10m, to enhance important bat corridors • Offsets increased to 50m from Shrubs Wood, Sheephouse Wood, Decoypond Wood and Runt's Wood for construction compound locations. In addition, further permissive routes have been incorporated in Parcels 1, connecting the original permissive path proposed at Phase Two Consultation to Calvert Road and onwards to PRoW to the north of Calvert Road, and in Parcel 2, which connects the existing bridleway along Splash Lane to the Bernwood Jubilee Way along the north of Field D3 (South).	
Scale	Granborough Parish Council Land interest	Comments on the scale of the Proposed Development. Comments that the Proposed Development is too large, including: • That the scale remains unchanged despite the reductions made since Phase One Consultation	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of schemes improves their economic	Y

	• Concern that the project could expand beyond the Order Limits in the future.	efficiency, bringing power to market at the lowest cost possible. It is shown that larger schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity. The **Statement of Need [EN010158/APP/5.6]**, which supports the Application, provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for the Proposed Development, including its size and location. Following Phase Two Consultation, the design of the Proposed Development has been reviewed and revised to take account of stakeholder engagement, technical assessment and advice, and the outcomes of the Environmental Impact Assessment. This has included amendments to the Order Limits and potential areas for Solar

	PV development as set out with the **Design Approach Document [EN010158/APP/5.8]**. This resulted in an overall reduction of the Order Limits to 675ha (compared to 875ha at Phase One and 744ha at Phase Two). Specific changes to the Proposed Development following Phase Two Consultation include further removal of Solar PV development around residential properties at Calvert Cottages and Catherine Cottages; further removal of Solar PV development from higher ground around Knowl Hill; increased offsets around Runts Wood and Finemere Wood; increased offsets along hedgerows between Sheephouse Wood, Shrubs Wood and Decoypond Wood; and increased offsets along ditches and watercourses. There are no plans to expand the Proposed Development and that it would not be possible to expand it without a separate planning application. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** confirms that, to maintain flexibility in the design, the Applicant has used the 'Rochdale Envelope' approach in assessing the impacts of the Proposed

			Development. This approach establishes maximum and, where relevant, minimum parameters. These parameters are secured under the Design Parameters section of **Design Commitments [EN010158/APP/5.9]**. The Proposed Development would also be restricted by the maximum areas shown on the **Works Plans [EN010158/APP/2.3]**. If granted, the DCO would require that the Proposed Development must be constructed within these parameters. The Applicant is not seeking to change these parameters and any significant change would likely require the Applicant to prepare and submit a material change request application for review by the Examining Authority or Secretary of State.	
Appearance	Quainton Parish Council	Comment that buildings should be clad in colours which complement the landscape and do not stand out.	While the exact colours and materials to be used on the exterior of the buildings and containers would be determined at the detailed design stage, **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** outlines that these would be grey or painted green in colour and rendered to suit local building styles. The proposed colours and building styles used have been determined in consultation with stakeholders such as	N

			Historic England and Natural England and would be secured by the **Design Commitments [EN010158/APP/5.9]**.	
Calvert	Land interest	Request for more of the Proposed Development to be centred towards Calvert in Parcel 1 rather than Parcel 3.	The layout of the Proposed Development has been determined by proximity to grid connection, availability of land and an iterative process to avoid, reduce, mitigate or offset potential environmental effects. The Rosefield Substation is located within Parcel 3 so that it is as close as possible to the National Grid East Claydon Substation, concentrating these larger elements of the Proposed Development adjacent to development of a similar scale and appearance. Further detail is provided in the **Design Approach Document [EN010158/APP/5.8]** and the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7]**). Following Phase Two Consultation, the proposed locations of the BESS, Collector Compounds and Rosefield Substation were each narrowed down to single siting zones. Subsequently, the BESS would no longer be located in Parcel 3 and Field E23 in the south of Parcel 3 is now only proposed to accommodate solar PV	N

			development. This results in an overall reduction in the potential number of larger elements of the Proposed Development within Parcel 3. As set out within the technical chapters of the **Environmental Statement [EN010158/APP/6.2]**, there are also a number of constraints in Parcel 1 that limit the scope for further development to be incorporated, including the proximity of residential properties; proximity of HS2 works; ecological constraints and offsets from woodland and hedgerows; and heritage and visual constraints, particularly in relation to views from Claydon House.	
Changes since Phase One Consultation	East Claydon Parish Council	Comment that there is no evidence that the Applicant has developed the design in response to feedback and engagement.	The **Design Approach Document [EN010158/APP/5.8]** sets out information about the evolution of the Proposed Development and how this has been informed by the feedback received through formal pre-application consultation and ongoing engagement. Changes made in direct response to feedback received at each stage of consultation – both to the design of the Proposed Development and the approach to assessment – have been summarised in the **Consultation Report [EN010158/APP/5.1]** (sections 2.6, 6.5	N

			and 7.5), and in more detail in the following **Appendices** to the **Consultation Report [EN01058/APP/5.2]**: • **A-4: Summary of responses to Phase One Consultation and consideration by topic**; • **J-1: Summary of s42(1)(a), (b) and (d) responses to Phase Two Consultation and consideration by topic**; • **J-2: Summary of s47 responses to Phase Two Consultation and consideration by topic**; and • **K-3 Summary of responses to targeted consultations and consideration by topic**.	
HS2	HS2	Comment that the Order Limits partially overlaps with the HS2 safeguarded area and Limits of Land to be Acquired or Used (LLAU) for the high-speed railway.	The Applicant is aware that some parcels of the land within the Order Limits are covered by The Secretary of State for Transport's HS2 Safeguarding Directions under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (HS2 Safeguarding). HS2's requirement for this land was for the purposes of mitigation. This land is also the subject of a private agreement between	N

			the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. However, given the requirements under the Direction, the Applicant is in the process of consulting with High Speed Two (HS2) Limited in relation to the effect of the Direction and will provide an update to the Planning Inspectorate or during the course of the Examination (should the application be accepted).	
National Grid Substation	East Claydon Parish Council	Comment that the Applicant should explain how the design of the Proposed Development fits with the plans for the replacement National Grid Substation.	The Applicant and National Grid Electricity Transmission Plc have had regular ongoing discussions to seek to co-ordinate the Proposed Development with existing and proposed infrastructure owned and operated by NGET (see **Consultation Report [EN010158/APP/5.1]**). Currently, there is a lack of technical detail for the replacement National Grid East Claydon Substation available. Continued discussions and co-ordination with National Grid is ongoing to ensure the designs are co-ordinated as much as possible. The proposed parameters relating to the Grid Connection Cable Corridor and the Rosefield Substation in Parcel 3 allow flexibility in these elements of the design to	N

			ensure that the Proposed Development can be accommodated in relation to the final design of the National Grid East Claydon Substation.	
Optionality	East Claydon Parish Council	Comment that it is not acceptable that the location and configuration of the BoSS, inverters and transformers would be established post-consent due to potential significant impacts e.g. noise and visual impacts.	As the Proposed Development has progressed through the DCO process, the design has become more refined with flexibility reducing. A level of flexibility is however necessary to allow the Proposed Development to respond accordingly to new information and circumstances which arise post-consent. For instance, the design development may include consideration of alternative equipment specifications, locations and number of noise emitting equipment within the Site boundary. In line with the EIA regulations, a reasonable worse-case scenario is assessed with the actual project likely to not impact the environment to the extent assessed/reported. Prospective design solutions would not be progressed if they result in levels that are above the operational noise rating levels as set out in the **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** These must be submitted to and approved by the relevant	N

planning authority as secured in the **Draft DCO [EN010158/APP/3.1]**.

With respect to noise, the proposed area for BoSS, Inverters and Transformers has been assessed from a noise and visual impact perspective. The noise impact of all of the noise emitting plant items associated with the Proposed Development is included within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** Additional mitigation measures have been implemented to reduce potential noise levels where necessary. No significant adverse effects are predicted following the introduction of appropriate mitigation measures. These mitigation measures are secured by the **Design Commitments [EN010158/APP/5.9]**.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports significant effects on a number of landscape and visual receptors. Green infrastructure proposals have been developed which include proposed new hedgerows and native woodland. These mitigation measures are secured by the **Design Commitments [EN010158/APP/5.9]**. Nevertheless, the assessment in **ES**

			Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] reports that there would be a number of residual significant adverse landscape and visual effects.	
Glint and glare				
Approach to assessment	Buckinghamshire Council	Recommendations for improved receptor identification along roads and railways. Comment that the report only identifies road junctions as the receptor locations and more should be added (ref. road sections located south of the site). Comment that the precise location of each railway signal and driver receptor along the train track should be shown.	The identification of route receptors (aviation, roads and railways) has been revised. Figures A.4 and A.5 in **Annex A** of the **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** show the roads (codes RD1 to RD7) and railways (codes RW1 to RW3) considered within the study area. These routes have been evaluated at 200m intervals along the paths, not only at junctions. However, showing the precise location of each analysis point has not been considered necessary due to the scale of the project. No relevant signals have been identified.	Y
Approach to assessment	Buckinghamshire Council	Comment requesting clarification about set up of aviation receptors, including approach angle, length of approach path.	As set out in **Section 6.2.4** of the **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**, the setup of aviation receptors follows the recommendations in FAA's Interim Policy Review of Solar Energy System Projects	Y

			(2013), in line with standard practice. Information about the aviation receptors included within the assessment, and their characteristics (approach angle, length of approach and threshold height), is presented in **Section 6.2**.	
Approach to assessment	Buckinghamshire Council	Comment that the Applicant should provide details of third-party documents referenced in the report.	**Section 12** of the **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** includes a reference list of third-party documents.	Y
Impact	Buckinghamshire Council	Request for justification why potential glare effects on receptor OP11 is considered low impact.	Receptor OP11 was wrongly identified as a building. This has been corrected, and this receptor has been removed from the assessment.	Y
Receptors	Buckinghamshire Council	Comment that receptors have not been assessed in the report: Bicester Aerodrome ATC, Bernwood Farm Airstrip, and Pear Tree Farm. arm Airstrip and Field Farm Airstrip.	The Applicant has updated the assessment to include Bicester Aerodrome, Pear Tree Farm and Field Farm Airstrip. This can be found within the **Glint and Glare Assessment** (**ES Volume 4, Appendix 5.4 [EN010158/APP/6.4]**). While the Applicant identifies Bernwood Farm Airstrip as a receptor in the assessment, it is excluded from the assessment as it would not be in use during the lifetime of the Proposed Development.	Y

Approach to assessment	Buckinghamshire Council	Comment requesting clarification about glare duration impact.	Information about the daily or annual frequency (i.e. how many hours would a receptor receive glare per day or year) is included, where relevant, within **Chapter 9** of the **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**.	N
Approach to assessment	East Claydon Parish Council	Comment that installations on north-facing slopes need further evaluation.	The **Glint and Glare Assessment** (**ES Volume 4, Appendix 5.4 [EN010158/APP/6.4]**) takes into account all slopes in the terrain, with terrain elevation heights based on OS Terrian 50m Digital Terrain Model data – therefore, no further evaluation is required.	N
Approach to assessment	East Claydon Parish Council	Comment that additional receptors should be considered in the assessment, including users of PRoWS and bridleways, and grazing animals such as horses.	There is no published guidance on the effects of glint and glare on bridleways, PRoW or fields with grazing animals. Nevertheless, the Applicant has included commentary on the likely effects on users of PRoW and bridleways and grazing animals within the **Glint and Glare Assessment** (**ES Volume 4, Appendix 5.4 [EN010158/APP/6.4]**), which confirms that no significant effects on these receptors are anticipated as a result of glint and glare from the Proposed Development.	N

Assessment of human health	Buckinghamshire Council	Comments on the approach to assessing human health impacts in the glint and glare assessment including that it is not supported by consultation with stakeholders and that it does not consider determinants of human health within identified receptor groups (e.g. road users, railways operations, residential properties and aerodromes).	The **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]** includes assessment of potential glint and glare effects on mental and physical health. Given that there are no significant glint and glare effects arising from the Proposed Development, it follows that there would not be any resultant significant effects on human health.	N
Guidance	Buckinghamshire Council	Comment that the FAA Interim Policy is outdated and should be replaced with latest guidance.	The FAA Interim Policy (2013) requires the use of the Solar Glare Hazard Analysis Plot (SGHAP) to demonstrate compliance with the standards of measuring potential ocular impacts on airports. This recommendation was withdrawn in the latest publication from 2021, but it did not provide an alternative method of assessment. Therefore, it is standard practice to keep using the SGHAP methodology as described in the previous guidance (2013).	N
Health and wellbeing				
Approach to assessment	Buckinghamshire Council	Comments that the Applicant's health impact assessment is insufficient, including that there should be a dedicated human health chapter in line with IEMA	In line with the proposed approach set out in the Scoping Report (**ES Volume 4, Appendix 5.1: Scoping Report [EN010158/APP/6.4]**), the Applicant has	N

2022 guidance rather than assessment being fragmented across the ES.

Specific impacts mentioned and requiring further consultation with relevant stakeholders:

- Air Quality, including dust impacts
- Landscape impacts, including PRoW users
- Noise and vibration
- Population
- Glint and glare

produced a **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**).

This draws upon relevant ES chapters, providing determinants and pathways for health effects to summarise the approach to the consideration and assessment of effects of the Proposed Development on human health and wellbeing (both physical and mental health).

This includes consideration to all the EIA topics listed by the host authority in its response, noting that more detailed analysis is included in each corresponding relevant technical chapter of the ES. This includes a summary of stakeholder engagement undertaken for each of these topics.

While a Human Health chapter has not been included in the ES, the approach is consistent with the Scoping Opinion and common practice, with the DCO Application for Springwell Solar [EN010149] adopting a similar approach. The **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]** presents effects

			through a health lens, referring to IEMA guidance referenced by the host authority.	
EIA	UK Health Security Agency	Comment that the respondent is satisfied with the Applicant's approach in preparing the EIA and conclusions drawn in regard to human health.	The Applicant thanks the UKHSA for its engagement throughout the pre-application period. Please refer to the **Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12]** that has been produced and shared following ongoing engagement with UKHSA.	N
Impact on farmers	Buckinghamshire Council	Comment that the Applicant fails to address the human health element of the physical loss of agricultural land and how it affects farm viability. For example, mental health and wellbeing impacts on farmers associated with changes to agricultural businesses and uncertainty around future viability.	It is important to note that potential effects on agricultural and non-agricultural employment and business viability within the Order Limits would be mitigated (or compensated for) through the development of financial compensation and/or land swaps to provide continuity for employment and socio-economic activity where practicable. **Section 3.7** of the **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) summarises how the Applicant has considered potential human health effects of the Proposed Development as part of its socioeconomic assessments (detailed in **Volume 2, Chapter 14: Population [EN010158/APP/6.2]**). This includes	N

		discussion of impacts on agricultural operators. The chapter suggests that the effect of the Proposed Development on the agricultural economy during both the construction and operational phases of development would be a direct, temporary (in some cases leading to permanent) slight adverse (not significant). This is due to the fact that the agricultural economy in Buckinghamshire is substantial and is subject to seasonal variations in employment which are far greater than the scale of the indicative loss of agricultural land as a result of the Proposed Development. Effects on agricultural businesses are also assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**, with assessments for both the construction and operational phases concluding that the effect would be temporary or permanent slight adverse (not significant). This is due to the fact that commercial agreements would be made between landowners and tenants on monetary compensation and/or alternative land provision ('land swap') to demonstrate due consideration of the potential for significant effects on the operators.

			Section 5 of the **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) provides commentary on mental health and wellbeing and how this has been considered in the design of the Proposed Development, as well as the approach to pre-application consultation and stakeholder engagement.	
Local community	Edgcott Parish Council	Comment that there would be harm to the wellbeing of the local community.	As set out in **Chapter 5** of the **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**), the Applicant has undertaken environmental assessments relating to the potential for effects on mental health and wellbeing (e.g. relating to residential amenity, noise and air quality). Where effects have been identified, these have been mitigated to their fullest extent through the adoption of the **Outline CEMP [EN010158/APP/7.2]**, the **Outline OEMP [EN010158/APP/7.3], Outline DEMP [EN010158/APP/7.4] , Outline LEMP [EN010158/APP/7.6], Outline SMP [EN010158/APP/7.7]** the **oCTMP [EN010158/APP/7.5], Outline RoWAS [EN010158/APP/7.8]** and the **Draft DCO**	N

			[EN010158/APP/3.1]. These mitigation measures ensure that residual effects on the local community are not significant where practically possible. The Applicant has also sought to provide enhancements to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing, including the creation of three new permissive footpaths to provide inclusive access to new locations around the Site, while connecting the existing network of promoted walks, cycleways and bridleways. This is detailed in the **Design Approach Document [EN010158/APP/5.7]**.	
Mental health	Calvert Green Parish Council	Comment that physical and mental health has been impacted from the construction and disruption posed by HS2 and now this would be exacerbated.	The Applicant has summarised how human health (physical and mental) has been considered as part of the Proposed Development in the **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**). **Section 2.5** provides an overview of the existing health baseline in the local area. **Section 3.6** of the **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) summarises how the Applicant has	N

considered potential human health effects of the Proposed Development as part of its traffic and transport assessment (detailed in **ES Volume 2, Chapter 15: Traffic and Transport [EN010158/APP/6.2]**). **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** describes and analyses in-combination and cumulative effects with other projects (including HS2) identified as part of the cumulative effects assessment (**ES Volume 2, Chapter 17 [EN)10158/APP/6.2]**) and describes them in terms of their relevance to health in line with guidance.

The Applicant recognises the importance of ensuring that the construction phase is well managed and, where practicable, is designed to reduce effects on the local community. The Proposed Development would include and be required to conform with the following management plans as they are secured in the DCO.

These plans contain mitigation measures and design requirements that have all been consulted on and approved by the relevant bodies during the various stages of the Proposed Development and are of relevance to health pathways for traffic and

			access effects to be avoided, reduced or managed: • **Outline Construction Environmental Management Plan [EN010158/APP/7.2];** • **Outline Construction Traffic Management Plan [EN010158/APP/7.5];** and • **Outline Operational Environmental Management Plan [EN010158/APP/7.3].**	
Land, soils and groundwater				
Approach to assessment	Buckinghamshire Council	Comment that no sensitive geological receptors have been identified in the Study Area and physical effects on geology have not been included in the assessment.	Following Phase Two Consultation, the Applicant engaged with the host authority on the matter of the assessment of geological hazards. It was agreed that geological hazards can be scoped out of the assessment (as indicated in Table 11.1: Table of Stakeholder Engagement**,** in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**), noting there is no mining identified on or in close proximity to the Site and only limited mineral extraction associated with Calvert Brickworks in the local area.	Y

Approach to assessment	Buckinghamshire Council	Comment that the PEIR omitted groundwater flow and mineral resource impacts.	At the request of Buckinghamshire Council, groundwater flow is assessed within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**. Mineral resources are covered in the **Mineral Safeguarding Assessment** which has been reviewed by the host authority. This is included in **Appendix 2** to the **Planning Statement [EN010158/APP/5.7]**.	Y
Baseline	Buckinghamshire Council	Comments on the baseline data, including that there is no ground investigation data to verify contamination risks, that the scope of any ground investigation should be agreed with relevant consultation bodies and that contamination sensitivity criteria is vague. Suggestion that further assessment is completed to ascertain whether identified landfill sites could pose a risk including a Phase 2 intrusive investigation with ground gas monitoring and soil analysis.	A site investigation has been undertaken of some areas within the Site, however, it has not been possible to undertake intrusive works of the entire Site in advance of the DCO submission. An interpretive report and further site investigations would be undertaken post-consent as set out and secured in the **Outline CEMP [EN010158/APP/7.2].** The scope of the further works would be subject to approval by the local planning authority as secured in the **Outline CEMP [EN010158/APP/7.2].** The scope of the surveys, which includes the targeting of potential sources of contamination identified within the Preliminary Risk Assessment is secured in the **Outline CEMP [EN010158/APP/7.2].**	Y

Should viable pollutant linkages be identified, further investigation and assessment and/or a remediation strategy should be developed, with the results confirmed and agreed with the relevant statutory consultees (i.e. local authority and Environment Agency). The scope of the Phase 2 intrusive investigation would include ground gas monitoring if this is concluded to be appropriate in consultation with Buckinghamshire Council. It would include laboratory analysis of soil samples based on the known historical potentially contaminative uses of the land, as determined by the desk-based assessment (**Appendix 11.1: Preliminary Risk Assessment** (**ES Volume 4, [EN010158/APP/6.4]**), and confirmed by the findings of the intrusive work (preliminary factual data are presented in **Appendix 11.3: Ground Investigation Report** (**ES Volume 4, [EN010158/APP/6.4]**).

In regards to the criteria for contamination sensitivity, the Applicant has updated criteria used to assess the impacts on groundwater since the PEIR, and the ES chapter (**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**)

			presents the updated criteria, with an explanation as to why changes were made and how it improves the robustness of the assessment. Criteria are further defined to provide examples of receptors within each category to provide greater consistency of allocating sensitivity criteria.	
Contamination	Buckinghamshire Council	Comment that the contamination significance of effects matrix uses different terminology to the soils and agriculture significance of effects matrix which is confusing.	The criteria for groundwater has been updated since the PEIR. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** presents changes that have been made, with an explanation as to why they were done. As requested, criteria are further defined to provide examples of receptors within each category, to ensure greater consistency when allocating sensitivity criteria. Terminology that is used is taken from the guidance that is referenced within the ES. In order to simplify the ES chapters, the land and groundwater assessment and the soil assessment have been presented in separate chapter, which results in less opportunity for confusion.	Y
Mineral safeguarding	Buckinghamshire Council	Comment that impacts to mineral resources have not been included in the preliminary assessment.	The approach to assessing impacts on mineral resources has been agreed with the host planning authority in advance of	Y

			the submission of the DCO Application. The Applicant has agreed with Buckinghamshire Council that a detailed Mineral Safeguarding Assessment is appropriate and that minerals can be scoped out of the ES assessment. The **Mineral Safeguarding Assessment** (**Appendix 2** of the **Planning Statement [EN010158/APP/5.7]**) has been submitted to the host authority for review in advance of the submission of the DCO Application.	
Soil management	Natural England	Comment welcoming commitment to providing an Outline Soil Management Plan. Other comments made suggestions for inclusion in the oSMP: • Information how the ALC grades and soil types have informed site-specific mitigation measures. • The exact amount of BMV land identified in the ALC survey • Commitment to undertake an assessment of soil resource before works commence. • Reference to DEFRA Construction Code	The **Outline Soil Management Plan (oSMP) [EN010158/APP/7.7]** has been submitted as part of the DCO Application. This has been reviewed by Natural England prior to submission with feedback addressed. The oSMP includes information about the area of BMV land within the Order Limits, sensitivity of soil resources and measures to mitigate damage, reference to DEFRA Construction Code, information on methods to restore affected areas, soil aftercare and information on the restoration of topsoil during construction and decommissioning. The Applicant has committed to reinstating the soil quality back to its pre-development quality at decommissioning.	Y

		• Information about methods the Applicant will use to restore affected areas. • Information about aftercare programme. • Information about how topsoil removed during construction would be restored • Information about restoration during decommissioning (inc. drainage).	The Applicant has also committed to a programme of soil health monitoring which would follow the 'AHDB Soil Health Scorecard Approach Protocol' which is a recognised method to undertaking soil health assessments. This would involve undertaking a baseline assessment prior to the construction phase, which is repeated at year 5 and 15 during the operational (including maintenance) phase. Details of the mitigation and restoration related to soil and agriculture are outlined in the **Outline Soil Management Plan [EN010158/APP/7.7]**. Details of the agricultural loss can be found within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].**	
ALC	Natural England	Comment that the spatial distribution of ALC grades are necessary to inform reinstatement criteria, which allows the area of each ALC Grade temporarily disturbed to be returned to the same quality as far as practicable to minimise potential loss.	The results of the spatial distribution of ALC grades can be seen in the **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]** and **ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3]**. The Applicant has committed to return the land the same quality as far as practicable to minimise potential loss following decommissioning.	N

ALC	Natural England	Comments welcoming commitment to reinstate soils to their pre-development agricultural use. Request for additional commitment to restore BMV land to its original grade.	The Applicant has committed to reinstating the soil quality back to its pre-development ALC Grade as far as practicable for agricultural use. Details of the mitigation and restoration relating to soil and agriculture are outlined in the **Outline Soil Management Plan [EN010158/APP/7.7]** and **Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4]**.	N
Approach to assessment	Natural England Buckinghamshire Council	Comments on ALC survey approach, including that the proposed methodology for solar PV areas is appropriate and that detailed ALC surveys are required for areas where permanent infrastructure is proposed; and that it follows relevant guidance. Other comments request information about the ALC grading of the wider 1km Study area.	The Applicant considers that its approach to agricultural land quality assessment, (agreed with Natural England), is considered to be appropriate. This information forms part of the assessment of effects that relate to land, soil and groundwater within **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]**. It is considered appropriate to provide ALC survey data only within the Order Limits. The ALC survey and **Outline Soil Management Plan [EN010158/APP/7.7]** have followed all relevant guidance related to soil and agriculture.	N
Approach to assessment	Natural England	Comment that at this stage the data methodology within Soil Resources and Agricultural Quality of Land South of	This has been noted. The results of the spatial distribution of ALC grades can be seen in the **ES Volume 4, Appendix 12.1:**	N

		Middle Claydon Report 2045/1 seems reasonably robust.	**Agricultural Land Classification Report [EN010158/APP/6.4]** and **ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3]**.	
Approach to assessment	Buckinghamshire Council	Comment that key factors such as climate change impacts and farm impacts have not been addressed.	**ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** addresses impacts related to soil quality and agricultural land quality. Climate has been assessed as part of the agricultural land classification survey to determine any limitations on agricultural land quality. Wider climate change related matters have been addressed within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2**], and the **Climate Change Resilience Assessment** (**ES Volume 4, Appendix 8.2 [EN010158/APP/6.4]**). Economic farm impacts have been addressed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**.	N
Approach to assessment	Buckinghamshire Council	Request for the chapter of the ES to outline information about the scope of the assessment, including how it has been informed by the Scoping Opinion and explain any changes made to the criteria proposed within the Scoping Report.	With respect to soil, land and groundwater, the scope of the assessment is set out in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Table 11.2 for matters that are scoped in and Table 11.3 for matters that are scoped out) and **ES Volume 2, Chapter 12: Soil**	N

			[EN010158/APP/6.2] (see Table 12.2 for matters that are scoped in; there are no matters that are scoped out for soil). For both of these topic chapters the changes made due to the Scoping Opinion are detailed within the tables referenced above, and where any changes to the assessment criteria were made, details of this are provided.	
Approach to assessment	Buckinghamshire Council	Comment that the current assessment is high-level and lacks specific data on affected receptors, construction methodologies and areas of land impact. The ES should also reflect any additional information obtained as part of further surveys.	A detailed assessment on land and groundwater is provided in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**, with information on the affected receptors provided in **Section 11.5: Environmental Baseline**. The assessment section (Section 11.8 Assessment of likely effects (without additional mitigation)) also includes further detail on the possible effects that could result from the project activities during construction, operation (including maintenance) and decommissioning stages. The chapter also considers the outputs of additional survey data with respect to ground conditions (as presented in the **Ground Investigation Report** (**ES Volume 4, Appendix 12.3 [EN010158/APP/6.4]**).	N

Approach to assessment	Buckinghamshire Council	Comments on the study area, including that the basis for the selection of the Study Area should be explained and that assessment is sometimes limited to a smaller area e.g. the Order Limits, a 250m buffer without explanation.	It should be noted that the PEIR published at Phase Two Consultation included the topic of soil within the same chapter as land and groundwater. To provide a clearer distinction between the issues relating to soil, and those relating to land and groundwater these topics have been separated in the Environmental Statement. Land and groundwater is covered in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158APP/6.2]** and soil is covered in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].** The study area for land and groundwater includes the Order Limits and a 1km buffer outside the Order Limits, as shown on **ES Volume 3, Figure 11.1: Order Limits and Study Area for Land and Groundwater [EN010158/APP/6.3]**.The Applicant has justified the study area for the land and groundwater assessment in paragraphs 11.4.1 – 11.4.3 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**. The Applicant has justified the study area for the soil assessment in paragraphs 12.4.1 –12.4.2 of **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**.	N

Approach to assessment	East Claydon Parish Council	Concern at the paucity of data on the extent of stripping of topsoil and its consequences for soil quality and water hydraulics across the Order Limits.	An **Outline Soil Management Plan [EN010158/APP/7.7]** has been produced which outlines the methodology for topsoil stripping and mitigation measures to prevent damage to the soil. This plan is in line with both the Defra 2009 Guidance and Institute of Quarry 2021 Guidance for Handling Soils.	N
Baseline	Natural England	Comment that there are a number of fields that have not been subject to an ALC survey at PEIR stage.	A total of 42.45 hectares was not surveyed due to access restrictions as stated in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**. The soil association maps as shown in **ES Volume 3, Figure 12.2: Soil Association Map [EN010158/APP/6.3]** indicate that the unsurveyed area is the same soil as the surveyed land on either side of the unsurveyed area. It is therefore reasonable to assume that the land which was not surveyed is classified the same as the proximal points. Therefore, it has been assumed that this land is classified as Grade 3b, limited by wetness due to the location and proximal observation points.	N
Contamination	Buckinghamshire Council	Comment that ecological receptors have not been considered within the Conceptual Site Model (CSM) even	Ecological receptors are considered to a degree within the CSM, within **Appendix 11.1: Preliminary Risk Assessment (ES Volume 4, [EN010158/APP/6.4])**, Section	N

		though these are identified as adjacent to the site.	6.2.2, where 'current and future vegetation' are considered. These receptors are carried forward into the written version of the CSM that is shown in Table 6.2, and the risk estimation is given as low or very low. The CSM is also shown on Figure 6 of **Appendix 11.1: Preliminary Risk Assessment (ES Volume 4, [EN010158/APP/6.4]**, where current and future vegetation are shown as receptor R4. For a more detailed consideration of potential effects relating to ecological receptors (for example the SSSIs Sheephouse Wood and Finemere Wood), including an assessment of the potential for effects on these in the format of an environmental impact assessment, **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** should be referred to.	
Contamination	East Claydon Parish Council	Query how the soil contaminated by water used in managing fires be handled.	Measures would be in place, as set out and secured in the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **Outline Drainage Strategy [EN010158/APP/7.11]**, to contain any contaminated water and avoid any pollution to the soil or groundwater. Any unexpected contamination during construction would be managed in line with	N

			the measures set out and secured in the **Outline CEMP [EN010158/APP/7.2].**	
Contamination	East Claydon Parish Council	Query potential long-term consequences in terms of contamination from metals and insulation materials.	During the operational life of each solar PV module, maintenance operations would ensure that no chemicals or heavy metals would be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **Outline OEMP [EN010158/APP/7.3]**. Panels that are correctly maintained would not result in any release of chemicals or heavy metals to the environment. Cables that are installed below ground would be suitable for that use, and therefore degradation of insulation materials would be minimal during the lifetime of the Proposed Development. At decommissioning, all temporary above-ground infrastructure would be removed, along with mounting structures for the solar PV panels, and cables that are located within 1m of the ground surface. The **Outline DEMP [EN010158/APP/7.4]** requires that the approach to the removal of below-ground cables at greater depth than 1m should be agreed at the time of decommissioning, which would ensure that	N

			the most appropriate techniques (based on legislation and industry standards at the time of undertaking the work) would be used for the Proposed Development.	
Construction	Natural England	Comment that mitigation measures for topsoil stripping (e.g. soil handing methodology and protection proposals) should be reviewed to allow for the restoration of the land to the baseline ALC Grade.	The Applicant would be required to reinstate soil quality back to its pre-development ALC grade as far as practicable. Details of the mitigation and restoration measures specific to soil and agriculture are outlined in the **Outline Soil Management Plan (oSMP) [EN010158/APP/7.7]** and **Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4]**.	N
Construction	East Claydon Parish Council	Comment that there is a risk around flooding during construction, including the primary construction route, the proposed route for AILs along the East Claydon Road, site accesses. Query whether the existing issues identified could be exacerbated by construction works.	Construction phase impacts on flood risk are considered in the **Outline CEMP [EN010158/APP/7.2]** with operational phase impacts assessed in the **Outline Drainage Strategy [EN010158/APP/7.11].**	N
Field drain	East Claydon Parish Council	Comment that the Applicant has underestimated the impact on field drains which could be affected by construction and need to be redrawn.	Methods to minimise and mitigate potential impacts upon field drains are detailed in the **Outline Soil Management Plan [EN010158/APP/7.7]**. Any damage to field drains would be restored.	N

General Comment	East Claydon Parish Council	Comment that the Applicant has ignored potential effects on land, soils and groundwater and underestimated impacts.	The Applicant respectfully disagrees with this comment. Effects on land, soils and groundwater have been presented and outlined in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** and **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].**	N
General Comment	Buckinghamshire Council	Comments that the PEIR does not adequately address the long-term impact on agricultural or proposed adequate mitigation measures. Other comments include that the Proposed Development would affect local food production and livelihoods of farmers.	The Proposed Development is considered to be temporary for a period of 40 years with the land returned to its current use at decommissioning. The Applicant has fully assessed and considered impacts on farmers, and outlined mitigation measures in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**.	N
Guidance	Natural England	Comment that the Applicant should have regard to government and BSSS guidance in considering BMV.	The Applicant has had regard for Paragraphs 5.11.12 and 5.11.34 of NPS EN-1 and Paragraphs 2.10.29 and 2.10.30 of NPS EN-3 in the site selection and design of the Proposed Development.	N
Management plans	Buckinghamshire Council	Comment that the Soil Management Plan, Piling Risk Assessment and Battery Safety Management Plan should be provided to assess the effectiveness of mitigation measures.	The **Outline Soil Management Plan [EN010158/APP/7.7]** and **Outline Battery Safety Management Plan [EN010158/APP/7.9]** includes relevant mitigation measures and forms part of the Application. A pilling risk assessment would be undertaken prior to construction	N

			as secured in the **Outline CEMP [EN010158/APP/7.2].**	
Mitigation	Buckinghamshire Council	Comment that mitigation measures are considered to be appropriate, and these should continue to be developed to reflect site-specific information.	The Applicant notes this comment and has outlined mitigation measures to prevent soil damage and loss within the **Outline Soil Management Plan [EN010158/APP/7.7].**	N
Optionality	East Claydon Parish Council	Comment that the assessment states that the effects on land, soils and groundwater would be the same in all optionality scenarios which is incorrect (e.g. loss of field drains, removal of topsoil, compaction).	Assumptions presented within the Preliminary Environmental Impact Report accounted for a reasonable worst case at the time of writing. A similar approach has been undertaken in the Environmental Statement to ensure the reasonable worst case optionality has been assessed from a land and groundwater and soil perspective. This approach is set out in Tables 11.4 and 12.4 of **ES Volume 2, Chapter 11: Land and Groundwater and Chapter 12: Soil [EN010158/APP/6.2].** Mitigation measures to prevent soil damage and loss are outlined within the **Outline Soil Management Plan [EN010158/APP/7.7].**	N
Quantification of loss	East Claydon Parish Council	Request for information on how many fields (number and area) would be lost from agriculture in total.	There would approximately 280 hectares of land that would be occupied by Solar PV development, Rosefield Substation, BESS and Main Collector Compound for the duration of the Proposed Development. At	N

			decommissioning, the Applicant would be required to reinstate the soil back to its pre-development quality. Details of the mitigation and restoration related to soil and agriculture are outlined in the **Outline Soil Management Plan [EN010158/APP/7.7]**. Details of the agricultural loss can be found within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].**	
Soil erosion	East Claydon Parish Council	Comment that there is potential for erosion associated with works on steep slopes located within the Order Limits.	Mitigation measures to prevent soil damage and erosion on slopes are outlined within the **Outline Soil Management Plan [EN010158/APP/7.7].**	N
Soil management	East Claydon Parish Council Natural England	Comment that where stockpiling of soil takes place this should maintain soil quality and minimise damage to the soil structure and provide optimal conditions for site restoration. Specific comments highlight potential for soil erosion, watercourse pollution and increase flood risks if in an area sensitive to flooding.	Mitigation measures to prevent soil damage and loss are outlined within the **Outline Soil Management Plan [EN010158/APP/7.7]**. This includes mitigation measures related to stockpiles to prevent erosion. The **Outline CEMP [EN010158/APP/7.2]** sets out and secures that the placement of stockpiled materials as far away as practically possible from sensitive receptors (including watercourses) and areas of flood risk.	N
Soil management	Natural England	Comment welcoming commitment to consider soil displacement and damage	This comment is noted, and mitigation measures to prevent soil damage and loss	N

		resulting from cable installation and access roads in the Soil management Plan.	are outlined within the **Outline Soil Management Plan [EN010158/APP/7.7].**	
Soil quality	East Claydon Parish Council	Comment that the Applicant has undervalued the importance of Grade 3b soils in a changing climate, including their high-water retention capacity.	The impact of future climate has been outlined within the future baseline section of **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**. The evaluation of Grading has been completed in accordance with the current ALC guidance and criteria. The predicted change of climate is currently not recognised within the ALC criteria. Climate is assessed based on the established climatology data within the ALC criteria and is used to assess all ALC surveys nationally. The water retention of a soil is assessed through wetness, flood risk and texture and therefore has been considered as part of the assessment.	N
Soil sensitivity	East Claydon Parish Council Steeple Claydon Parish Council	Comment that the physical value of the land is undervalued and would be harmed by the Proposed Development.	The value of the land has been assessed by competent professionals and based on recognised guidance and standards, specifically the ALC guidance and IEMA guidance. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** assesses the physical impacts on soil and agriculture. The economic and social value of farming	N

	is assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The sensitivity of the land has been designated based on the IEMA guidance (Institute of Environmental Management and Assessment (IEMA) (2022) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment) and the degree of sensitivity is determined by the ALC criteria for grading soils (Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification for England and Wales: Revised Criteria for Grading the Quality of Agricultural Land (ALC011). This methodology defines soil sensitivity based on its Agricultural Land Classification and soil resilience, which has been confirmed by a site-specific survey. The methodology and results of this survey have been reviewed and agreed by Natural England as detailed in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**. The potential impacts on soil and availability of agricultural land is assessed within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**, which applies the agreed methodology to the site-specific soils, and determines the necessary management techniques to ensure that the

			soil is not harmed by the Proposed Development.	
Survey	East Claydon Parish Council	Comment that soil sampling in potential cable route search areas has not been undertaken which limits understanding.	Due to access restrictions, there is a total of 42.45ha, which forms part of the inter-connecting cable corridor(s)which has not been surveyed. This area has been predicted to be Grade 3b, based on a desk-based study and proximal auger points. The soil is homogeneous across the Site, and the results have been shared and agreed with Natural England.	N
Use of agricultural land	East Claydon Parish Council Edgcott Parish Council Preston Bissett Parish Council	Comments opposing the use of agricultural land for the Proposed Development, including: that the Proposed Development is against policy which prioritises the UK improving food security.	Food security is not an issue which is raised within the suite of Energy NPSs, the NPPF or Local Development Plan policies, though it is recognised to be a source of national debate and is referred to in the 2024 Written Ministerial Statement. This sets out that food security is an important part of our national security. The amount of agricultural land that would temporarily be used for solar development as a result of the Proposed Development represents less than 0.005% of the UK's available agricultural land and therefore no further consideration of this matter is provided.	N

Use of agricultural land	Natural England	Comment that the use of BMV and agricultural land should factor into the overall planning balance for the Proposed Development.	The Applicant notes this comment and confirms that the **Planning Statement [EN010158/APP/5.7]** has considered the importance of agricultural land classifications and land types through the planning assessment. **ES Volume 2, Chapter 12: Soil [EN010158/APP.6.2]** concludes that 94.42% of the Site is non-BMV, 4.07% of the Site is non-agricultural land and 1.51% of the Site is BMV.	
Landscape and visual				
Efficacy of screening	National Trust	Comment that there are a number of reasons why screening may cease or not be effective, including Dutch elm disease, seasonality, slow growth rates, and leggy hedgerows	The **Outline LEMP, Appendix 3 [EN010158/APP/7.6]** provides proposals for the gradual increase in height of hedgerows to maintain structure and vigour of plants and resistance to disease, such as Dutch elm disease. In particular, growth rates would be limited to 150mm per annum and the maximum heights of hedgerows has been reduced from 4m to 3.5m. In each instance, hedgerows would only be grown as tall as required to screen infrastructure at each location. Feedback from Phase Two Consultation indicated a requirement to screen potential views from breaks in hedgerows, such as	Y

			local lanes and field entrances with additional planting as appropriate. Planting is proposed to reinforce the avenue of poplars to Three Points Lane, to plant new hedgerow to the access to Pond Farm and general use of block woodland 'parkland' planting rather than a more ecological mosaic type planting.	
General – landscape and visual	East Claydon Parish Council Steeple Claydon Parish Council	Comment that the Applicant has misunderstood the impact of the Proposed Development on the landscape and the effect has not been appropriately mitigated.	Following Phase Two Consultation, further mitigation measures have been embedded into the design of the Proposed Development. Specifically, green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland as secured by the **Outline LEMP [EN010158/APP/7.6]**. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that, in the early years of operation, there would be a moderate adverse (significant) effect on a tract of the landscape surrounding the Proposed Development in both LCA 5.7: Hogshaw Claylands and 7.3: Claydon Bowl; and major/moderate adverse	Y

			(significant) effect on a tightly defined tract of LCA 9.1: Finemere Hill. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the significant effects on these three LCAs would remain. It is acknowledged that residual effects cannot always be mitigated, and such effects will be weighed in the planning balance as part of the decision the Secretary of State will make in deciding whether to grant consent for the DCO Application (see **Planning Statement [EN010158/APP/5.7]**).	
General – landscape and visual	Edgcott Parish Council, Granborough Parish Council	Comment that the Proposed Development would have an adverse impact on the visual amenity on the surrounding area and rural character of the landscape.	The design of the Proposed Development has been developed to respond to the local landscape character of the Site, informed by relevant local studies such as Aylesbury Vale Landscape Character Assessment. This is set out in the **Design Approach Document [EN010158/APP/5.8]** and is one of the Project Principles (Principle 6.1) which has been used to guide the design.	Y

	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Specifically, green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. Effects on landscape character are assessed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. The assessment notes that the Order Limits span LCAs 5.6: Claydon Valley; 5.7: Hogshaw Claylands; 7.3: Claydon Bowl; and 9.1: Finemere Hill. The assessment considers the sensitivity of these character areas to the type of development proposed taking account of factors such as openness and landcover amongst other things. In the early years of operation, there would be a moderate adverse (significant) effect on a tract of the landscape surrounding the Proposed Development in both LCA 5.7: Hogshaw Claylands and 7.3: Claydon Bowl; and major/moderate adverse (significant) effect on a tightly defined tract of LCA 9.1: Finemere Hill. By year 10 (following the establishment of mitigation

			planting), notwithstanding the fact that there would be some screening and softening of views, the significant effects on these three LCAs would remain. The assessment reports a minor adverse (not significant) effect on a tightly defined tract of the landscape surrounding the Proposed Development in LCA 5.6: Claydon Valley, largely as a result of the limited area of LCA 5.6 that falls within the Order Limits. It is acknowledged that residual effects cannot always be mitigated, and such effects will be weighed in the planning balance as part of the decision the Secretary of State will make in deciding whether to grant consent for the DCO Application (see **Planning Statement [EN010158/APP/5.7]**).	
Impact on Granborough	Granborough Parish Council	Comment that the Proposed Development would have a visual impact from Granborough properties.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a moderate adverse (not significant) effect on properties to the western edge of Granborough (primarily Sovereign Close) in the early years of operation.	Y

	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Specifically, the removal of the Rosefield Substation and larger scale infrastructure from Field E23, with Solar PV modules only in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the moderate (not significant) effect on these properties would remain. There would therefore remain moderate (not significant) residual effects for the duration of the operational (including maintenance) stage of the Proposed Development.

Impact on Landscape Character Areas	Buckinghamshire Council East Claydon Parish Council	Comments on impacts on Landscape Character Areas, including that several LCAs are likely to experience permanent significant adverse effects to landscape character, including Hogshaw Claylands, Westcott Claylands, Claydon Bowl, Finemore Hill, and Quainton Hill. Other comments disagree that the effects on landscape for Claydon Valley LCA are not significant.	The design of the Proposed Development has been developed to respond to the local landscape character of the Site, informed by relevant local studies such as Aylesbury Vale Landscape Character Assessment. This is set out in the **Design Approach Document [EN010158/APP/5.8]** and is one of the Project Principles (Principle 6.1) which has been used to guide the design. Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Specifically, green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. Effects on landscape character are assessed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. Detailed assessment has been undertaken for LCAs 5.6: Claydon Valley; 5.7: Hogshaw Claylands; 7.3: Claydon Bowl; 9.1: Finemere Hill and 9.2: Quainton Hill. The assessment considers the sensitivity of these character areas to the type of development proposed taking account of factors such as openness and landcover	Y

amongst other things. As noted in the LVIA, LCA 5.9: Westcott Claylands has been scoped out of the study in agreement with the host authority.

In the early years of operation, there would be a moderate adverse (significant) effect on a tract of the landscape surrounding the Proposed Development in both LCA 5.7: Hogshaw Claylands and 7.3: Claydon Bowl; a major/moderate adverse (significant) effect on a tightly defined tract of LCA: 9.1: Finemere Hill; and a moderate adverse (not significant) effect on a tightly defined tract of LCA: 9.2: Quainton Hill.

By year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the significant effects on LCAs 5.7, 7.3 and 9.1 would remain.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports a minor adverse (not significant) effect on a tightly defined tract of the landscape surrounding the Proposed Development in LCA 5.6: Claydon Valley, largely as a result of the

			limited area of LCA 5.6 that falls within the Order Limits.	
Impact on PRoW	Buckinghamshire Council East Claydon Parish Councill	Comments on the impact on PRoW including: that several promoted recreational routes and PRoW are likely to experience permanent significant adverse visual effects, that this would have a detrimental impact on local residents and visitors.	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. This includes the development of green infrastructure proposals which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a major adverse (significant) effect on PRoW between Calvert Road and HS2 and PRoW between Botolph Claydon and Runt's Wood; a major/moderate adverse (significant) effect on Bernwood Jubilee Way, PRoW to Finemere Hill and PRoW between East Claydon Road and Parcel 3; and a moderate adverse (significant) on promoted routes North Buckinghamshire Way/Midshires Way and Swan's Way/Outer Aylesbury Ring in the early years of operation. By year 10 (following the establishment of mitigation planting) notwithstanding the fact that there would be some screening and	Y

			softening of views, the majority of significant effects would remain. In the case of North Buckinghamshire Way/Midshires Way, following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Along with the above green infrastructure proposals, the Rosefield Substation and larger scale infrastructure has been removed from Field E23, with Solar PV modules only in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. By year 10 (following the establishment of mitigation planting), effects would be reduced to moderate/minor (not significant) for users of this promoted route.	
Impact on Splash Lane	East Claydon Parish Council	Comment that development of Fields D3 (N&S), D12, D13, D28 & D29 should not be permitted due to visual impact on Splash Lane and associated permissive route around Runts Wood. Comment disagreeing that the view could be mitigated by hedgerows due to topography.	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]** and in accordance with **Appendix 1: Green and Blue Infrastructure Parameters** of the **Outline LEMP, [EN010158/APP/7.6]**. For Splash	Y

Lane, this has been through proposed new hedgerow and native woodland (Fields D12, D13 and D23 (South)) to screen views of Solar PV modules. For the permissive route to Runt's Wood, this has been through the creation of a 30m width buffer of species rich grassland and scrub (Fields D28 and D29) to screen Solar PV modules.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports a major adverse (significant) effect on PRoW between Botolph Claydon and Runt's Wood (including bridleway ECL/10/1 and ECL/10/2 known as Splash Lane); and a major/moderate adverse (significant) effect on Bernwood Jubilee Way and PRoW to Finemere Hill (including the permissive route to Runt's Wood) in the early years of operation.

By year 10 (following the establishment of mitigation planting), effects would be reduced to moderate (significant) for users of Splash Lane and the permissive route to Runt's Wood. These significant effects take into account the change in views and

			visual amenity experienced by users as a result of the proposed mitigation measures.	
Impact on transport routes	Buckinghamshire Council	Comment that main transport routes are likely to experience permanent significant adverse visual effects.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be no significant adverse effect on the visual amenity on users of main roads road users. Users of these roads would experience up to moderate (not significant) effects to Quainton Road/Claydon Road, moderate/minor adverse (not significant) effects to Orchard Way/Calvert Road and minor/negligible adverse (not significant) effects to Winslow Road/East Claydon Road and Queen Catherine Road in the early years of operation. Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. Bespoke offset buffers have been applied to a number of routes and green infrastructure proposals have been developed which include a considerable amount of proposed new hedgerow and native woodland as	Y

			identified in the **Outline LEMP, Appendix 3 [EN010158/APP/7.6]**. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), effects would be reduced to minor adverse (not significant) for Quainton Road/Claydon Road and Orchard Way/Calvert Road and remain minor/negligible (not significant) for Winslow Road/East Claydon Road and Queen Catherine Road.	
Impact on villages	Buckinghamshire Council	Comment that several villages are likely to experience permanent significant adverse visual effects, including Steeple Claydon, Botolph Claydon and Granborough.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports no significant adverse effect on the visual amenity of residents in any of villages surrounding the Site. Residents of Botolph Claydon and Granborough would experience up to moderate (not significant) effects, those of Steeple Claydon up to moderate/minor adverse (not significant) effects, whilst no other settlements would experience more than minor adverse (not significant) effects. Following Phase Two Consultation, the Rosefield Substation and larger scale infrastructure has been removed from Field E23, with Solar PV modules only proposed	Y

			in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 (see **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**). Together with the green infrastructure proposals identified in **Appendix 3** of the **Outline LEMP**, **[EN010158/APP/7.6]**, this has resulted in the mitigation of significant effects identified in the PEIR.	
Impact on visitor attractions	Buckinghamshire Council	Comment that visitor attractions are likely to experience permanent significant adverse visual effects.	The design of the Proposed Development has evolved to consider the potential effects of the Proposed Development on the visual amenity of visitors to Claydon House & RPG and Hogshaw Farm and Wildlife Park. In response to stakeholder feedback from Phase Two Consultation, areas of proposed Solar PV modules have been removed from Fields B9 and B11 to reduce visibility of the Proposed Development from Claydon House, as well as reinforcement of the existing tree belt and hedgerow along Three Points Lane (see **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**). The siting zone for the collector compound in Field B23 has also been reduced. In the case of Hogshaw Farm, a substantial	Y

			woodland tree buffer is proposed to the eastern boundary of Fields B8,9,19 and 26. Following application of the mitigation measures, a moderate adverse (significant) effect would remain on users of these visitor attractions during the lifetime of the Proposed Development. Where possible, the Applicant has also worked with stakeholders to develop potential enhancement measures. This includes a permissive footpath which would provide additional viewpoints of Claydon House and RPG from Knowl Hill with potential for interpretative measures.	
Management of screening	East Claydon Parish Council	Comments around management of hedgerows, including that the height proposed would present management challenges, and query who would be responsible for maintenance.	The Applicant would be responsible for the management of hedgerows. Following Phase Two Consultation, the maximum height of hedgerows has been reduced from 4m and hedgerows would be maintained to maximum heights of between 3-3.5m. **Appendix 2: Landscape and Ecological Mitigation and Enhancements** of the **oLEMP [EN010158/APP/7.6]** provides details of hedgerow management.	Y

Midshires Way	East Claydon Parish Council	Comment that the Midshires Way would be surrounded by industrial elements located in E20-23.	In the case of North Buckinghamshire Way/Midshires Way, following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Specifically, the removal of the Rosefield Substation and larger scale infrastructure from Field E23, with Solar PV modules now only proposed in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 (see **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**). Green infrastructure proposals have been developed which include a proposed new hedgerow and native woodland. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a moderate adverse (significant) effect on the North Buckinghamshire Way/Midshires Way in the early years of operation. By year 10 (following the establishment of mitigation planting), effects would be reduced to moderate/minor (not significant) for users of this promoted route.	Y
Mitigation	Buckinghamshire Council	Comment that the mitigation of visual effects is inadequate and impractical.	Following Phase Two Consultation, mitigation measures have been embedded	Y

into the design of the Proposed Development, including the removal of Solar PV and development of green infrastructure proposals which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland.

For example, in the case of 4-5 Catherine Cottages, 6-7 Catherine Cottages and the North Buckinghamshire Way/Midshires Way, relevant mitigation measures include the removal of Solar PV modules from Field B5 and the Rosefield Substation and larger scale infrastructure from Field E23, with Solar PV modules now only proposed in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a major adverse (significant) effect on Sion Hill Farm, PRoW between Calvert Road and HS2 and PRoW between Botolph Claydon and Runt's Wood; a major/moderate adverse (significant) effect on LCA 9.1, 6-7 Catherine Cottages, Bernwood Farm, Bernwood Jubilee Way, PRoW to Finemere Hill and PRoW

			between East Claydon Road and Parcel 3; and a moderate adverse (significant) on LCA 5.7, LCA 7.3, 4-5 Catherine Cottages, promoted routes North Buckinghamshire Way/Midshires Way and Swan's Way/Outer Aylesbury Ring, Claydon House and Hogshaw Farm and Wildlife Park in the early years of operation. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the majority of significant effects would remain. By year 10 (following the establishment of mitigation planting), effects would be reduced to moderate (not significant) for 4-7 Catherine Cottages and moderate/minor (not significant) for users of the promoted route.	
Mitigation	Buckinghamshire Council	Comments on the proposed mitigation measures, including that more specific measures should be provided once the design is finalised, that the proposed buffers are insufficient and that buffers	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development, taking into account this worst-case scenario in terms of the extent and height of infrastructure. Bespoke offset	Y

		used in embedded mitigation measures are very standard.	buffers have been applied to a number of locations, for example an increased offset of 30m from hedgerows located along the boundaries of Field D29 and partially in Field D28 following engagement with Natural England. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland as identified in **Appendix 3** of the **Outline LEMP [EN010158/APP/7.6]**. The approach to mitigation is set out in the **Design Approach Document [EN010158/APP/5.8]** and offsets are set out and secured in the **Design Commitments [EN010158/APP/5.9].**	
PRoW	East Claydon Parish Council	Comment that the amenity of key PRoWs would be lost as a result of the Proposed Development, including Bernwood Jubilee Way, Bridleway ECL/102/2, permissive pathway along Runts Wood.	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. Bespoke offset buffers have been applied to a number of routes and green infrastructure proposals have been developed, which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland	Y

as identified in **Appendix 3** of the **Outline LEMP [EN010158/APP/7.6]**.

In the case of the Bernwood Jubilee Way, mitigation measures include the removal of Solar PV modules through the inclusion of a 55m width buffer of species rich grassland and new hedgerow planting to the western boundary of Solar PV modules in Fields D4, D11, D14 and D15. In the case of Splash Lane, green infrastructure proposals have been developed which include proposed new hedgerow and native woodland (Fields D12, D13 and D23 (South) to screen views of Solar PV modules. In the case of the permissive route to Runt's Wood, proposals include the addition a 30m width buffer of species rich grassland and scrub (Fields D28 and D29) to screen Solar PV modules.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a major adverse (significant) effect on PRoW between Botolph Claydon and Runt's Wood (including bridleway ECL/10/1 and ECL/10/2 known locally as Splash Lane); and a major/moderate adverse (significant) effect on Bernwood Jubilee Way and PRoW to Finemere Hill

			(including the permissive route to Runt's Wood) in the early years of operation. Following the establishment of these mitigation measures, effects would be reduced to moderate (significant) for users of Splash Lane and the permissive route to Runt's Wood but would remain as major/moderate (significant) for users of the Bernwood Jubilee Way. These significant effects take into account the screening and softening of views by mitigation measures but also recognise the change in visual amenity of their users.	
Rosefield Substation	Buckinghamshire Council	Comment that the Rosefield Substation would have significant visual implications based on its location.	The assessment of two scenarios for the location of the Rosefield Substation was undertaken as part of PEIR assessment. Following Phase Two Consultation, the design has become more detailed with the location of the Rosefield Substation more clearly defined in order to enable a reasonable worst-case scenario to be assessed. This included removal of the Rosefield Substation and larger scale infrastructure from Field E23, with Solar PV modules only in E23 and the Main Collector Compound (to 6m) in E21, E22, E11 and/or E20 as outlined in **ES Volume 3, Figure 3.1: Height Parameters**	Y

[EN010158/APP/6.3]. The Rosefield Substation would largely be viewed in context of the existing National Grid East Claydon Substation.

Green infrastructure proposals have also been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that the proposed Rosefield Substation would contribute to the major adverse (significant) effect on Sion Hill Farm; a major/moderate adverse (significant) effect on PRoW between East Claydon Road and Parcel 3; and a moderate adverse (significant) on LCA 5.7 and promoted routes North Buckinghamshire Way/Midshires Way.

By year 10 (following the establishment of mitigation planting), effects would be reduced to major/moderate (significant) for Sion Hill Farm, moderate (significant) for PRoW between East Claydon Road and Parcel 3 and moderate/minor (not significant) for users of the promoted route.

RVAA	Buckinghamshire Council East Claydon Parish Council	Comments on the RVAA, including that a more detailed assessment is expected to be included in the ES, that the RVAA has only been undertaken at limited properties, that the outputs of the assessment have not been considered in the design of the Proposed Development.	A detailed RVAA has been included in the **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4].** The inclusion of properties within the RVAA is determined by a combination of desk study, including review of ZTVs and the Residential Property Location Plan and field review. It is noted that a number of the properties already mentioned by East Claydon Parish Council would fall into the category of residences on the edge of the original 800m buffer. With the removal of largest infrastructure from Fields E21-23, the potential for overbearing impacts upon properties to the eastern edge of East Claydon/Botolph Claydon has reduced substantially. As such, the question of their inclusion in the RVAA is no longer considered relevant.	Y
Screening	East Claydon Parish Council	Comment that typical field boundary hedgerows in the area are half of the 4m height proposed which would change the character of the area. Specific comment made to permissive pathway along Runts Wood and creation of a 'tunnel effect' along footpaths more generally.	Following Phase Two Consultation, the maximum height of hedgerows has been reduced from 4m, and hedgerows would be maintained to maximum heights of between 3-3.5m as required to screen infrastructure at each location. **Appendix 2: Landscape and Ecological Mitigation and Enhancements** of the **oLEMP**	Y

			[EN010158/APP/7.6] provides details of hedgerow management. Even allowing for growth, any hedgerows adjacent to footpaths would maintain a wide pedestrian corridor, enabling the continued ability to enjoy the route even where views from it would be altered. The LVIA presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** acknowledges that in some locations, new planting would foreshorten existing views where the alternative would be views of the new infrastructure. In the case of the permissive route to Runt's Wood, proposals include the addition of a 30m width buffer of species rich grassland and scrub (Fields D28 and D29) to screen Solar PV modules.	
Sion Hill Farm	East Claydon Parish Council	Query why viewpoints from Sion Hill Farm have not been documented.	Views from Sion Hill Farm have been considered as part of the RVAA presented in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]**.	Y
Viewpoints	East Claydon Parish Council	Comments that the viewpoints are not representative. Query why no viewpoints are included in East Claydon. Specific reference made to	The preliminary viewpoint analysis enabled a wide selection of viewpoints to be reviewed and presented as part of the PEIR submission. Following Phase Two	Y

	Mushroom Shelter, Ivy Nook, Botolph Farm, Botolph House, St Mary's Road, Claydon Road, permissive pathway south of Runts Wood. Comments on assessment of Viewpoints 9-13 in relation to the overall assessment of the impact on the receptor.	Consultation, six additional viewpoints were added that reflected the requests of Buckinghamshire Council and parish councils as follows: • Viewpoint 38: Permissive footpath to Steeple Claydon • Viewpoint 39: EastWest Rail Overbridge, Addison Road • Viewpoint 40: St Mary's Way, The Mushroom Shelter, Ivy Nook • Viewpoint 41: Permissive footpath to Runt's Wood • Viewpoint 42: Footpath SCL/12/1 to Parcel 1 • Viewpoint 43: Pygmy Goat Enclosure, Hogshaw Farm and Wildlife Park Publicly accessible views from East Claydon are very limited. The Mushroom Shelter has been included to provide views similar to those experienced from Ivy Nook, a private residence not included in the RVAA as it now lies well outside the RVAA buffer to the Rosefield Substation. Other publicly accessible views from East Claydon are screened by intervening vegetation or built form, hence it has not

			been included as a separate receptor. Discussion of the change at each viewpoint can be found in **ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4]**. Each such viewpoint analysis provides a 'snapshot' which informs the overall assessment of each receptor. For instance, Viewpoints 9-11 all relate to the Bernwood Jubilee Way and are assessed individually in **Appendix 10.4** but 'in the round' as the Bernwood Jubilee Way in the LVIA chapter.	
Viewpoints	East Claydon Parish Council	Comments that the Preliminary Viewpoint Analysis and visualisations serve to demonstrate the impact of the Proposed Development.	The preliminary viewpoint analysis enabled a wide selection of viewpoints to be reviewed and presented as part of the PEIR submission. Following Phase Two Consultation, six additional viewpoints were added. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports effects on the visual amenity of receptors which are illustrated by annotated baseline photographs presented in the Viewpoints and Visualisations document in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**.	Y

Viewpoint 11	Steeple Claydon Parish Council	Comment that Viewpoint 11 is too low down from the top of Steeple Claydon village and from a point on the PRoW and therefore does not adequately assess the impact on Steeple Claydon. Specific reference made to Vicarage Lane.	Following Phase Two Consultation, Steeple Claydon Parish Council requested the inclusion of an additional viewpoint to reflect more elevated views from the permissive footpath to the south of Vicarage Lane. As such, the permissive footpath to Steeple Claydon has been included as an additional viewpoint (Viewpoint 38) in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** to supplement the preliminary selected Viewpoint 11 and provide representative views for users of the PRoW network between Steeple Claydon and Calvert Road. Effects of moderate/minor adverse (not significant) are reported in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**.	Y
Visibility	National Trust	Comment that the Proposed Development would be visible from several approach roads from the south to Claydon House and further assessment is required (e.g. from the lane to the west of Claydon House).	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3].** Bespoke offset buffers have been applied to a number of routes and green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5	Y

hectares of proposed native woodland as identified in **Appendix 3** of the **Outline LEMP [EN010158/APP/7.6].**

In the case of Calvert Road, Solar PV modules have been removed from Field B5 and green infrastructure proposals developed which include proposed new hedgerow and native woodland to Fields B5, B22 and B23 (North) and Three Points Lane to screen views of Solar PV modules.

The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be no significant adverse effect on the visual amenity of road users approaching Claydon House & RPG. Users of these roads would experience moderate/minor adverse (not significant) effects to Calvert Road and minor/negligible adverse (not significant) effects to Queen Catherine Road, Addison Road and the unnamed lane to the western boundary of Claydon RPG in the early years of operation. It is noted that for the unnamed lane, views are limited to brief oblique views from the junction with Calvert Road only. By year 10 (following the establishment of mitigation planting), effects would remain either

			minor/negligible adverse (not significant) or, for the users of Calvert Road, would be reduced to minor adverse (not significant).	
Visualisations	Historic England, Preston Bissettt Parish Council	Comments about ancillary infrastructure and potential visual impacts, including that the photomontages should take into account associated infrastructure e.g. lighting, compounds, CCTV, fencing	The photomontages provided in **ES Volume 4, Appendix 10.6 - LVIA Visualisations [EN010158/APP/6.4]** include details of associated infrastructure including satellite collector compounds, fencing, tracks, CCTV and other infrastructure that would have a bearing on visual impact.	Y
Approach to assessment	Historic England	Comment that the LVIA should include visualisations to demonstrate how the Proposed Development would appear in key views affecting heritage assets, including: • Claydon House and All Saints Church - View from the west terrace • Claydon House – View from west elevation at first floor level • Botolph Claydon Conservation Area – view looking south	Ongoing engagement with Historic England (detailed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**) included sharing visualisations prepared in a 3D model which has been used to inform the assessment. Relevant views from the 3D model have been illustrated within **Annex D of ES Volume 4, Appendix 9.1 Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]**. Verified photomontages have been prepared for Viewpoint 5 from the ha-ha west of Claydon House and Viewpoint 9 from the south of Botolph Claydon Conservation Area and are included in **ES Volume 4,**	N

			Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4].	
Approach to assessment	Buckinghamshire Council	Query for confirmation of the indicative woodland heights used in the datasets which have informed the ZTV to ensure they are appropriate for the area being assessed.	Heights of woodland and buildings in ZTVs were reduced from those submitted at Scoping Stage in response to the request by the host authority for the PEIR (6m for buildings and 10m for woodland). This is compared to 7.5m and 15m respectively at scoping stage. The ZTV figures presented in **ES Volume 3 [EN010158/APP/6.3]** use the same 6m building and 10m woodland heights.	N
Assessment of human health	Buckinghamshire Council	Comments on the approach to assessing human health impacts in the LVIA including that it does not reference IEMA 2022 guidance, is not supported by consultation with stakeholders and does not highlight health impacts on PRoW users and residents experiencing changes to amenity.	The **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) includes assessment of health-specific effects (mental and physical) arising from the changes to visual amenity from public and private viewpoints assessed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** in line with IEMA 2022 Guidance. This includes an assessment of health impacts on PRoW users and residents experiencing changes to their visual amenity	N

Approach to assessment	East Claydon Parish Council	Comment that St Mary's Road and Botyl Road should be included in list of main roads.	Botyl Rd/St Mary's Road are scoped into the LVIA as identified in **Table 10.2** of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. The visual effects on users of Botyl Road/Saint Mary's Road are very limited due to screening by robust roadside/field hedgerows and they have been considered as part of the Botolph Claydon receptor group. Viewpoints 13 and 40 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** provide representative views from these roads at points where breaks in the hedgerow at field entrance provide views of the Proposed Development. Effects on this receptor have been assessed as at most moderate adverse (not significant).	N
Approach to assessment	East Claydon Parish Council	Query why viewpoints are photographed at 1.5m height AGL rather than 2m adopted for ZTV assessment.	A height of 1.5m AGL is standard for photography in terms of Landscape Institute guidance (TGN 06/19 – Appendix 3). A height of 2m for the ZTV ensures that a very worst-case scenario is provided in terms of the extents of potential visibility.	N
Approach to assessment	East Claydon Parish Council	Comments on assessment of receptors, including that the value of views should be regional/ community, that susceptibility	The assessment of receptor sensitivity follows the Guidelines for Landscape and Visual Impact Assessment, LI/IEMA (2013) best practice and professional judgement.	N

		of local residents is high and cumulative effects is high.	A detailed landscape sensitivity appraisal is presented **in ES Volume 4, Appendix 10.3: Landscape Sensitivity Appraisal [EN010158/APP/6.4]** with receptor sensitivity summarised in **Tables 10.10** and **10.11** in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**.	
General – landscape and visual	Buckinghamshire Council	Comment that the Proposed Development would annex areas of related historic design landscape.	The design of the Proposed Development has been developed to respect the historic pattern of the landscape and setting of cultural sites, including Claydon House and individual Listed Buildings by responding to the distinctive character of the local environment. This is set out in the **Design Approach Document [EN010158/APP/5.8]** and is one of the Project Principles (Principles 6.3 and 6.4) which has been used to guide the design.	N
General – landscape and visual	Buckinghamshire Council	Comment that there would be a loss of sense of place.	As set out in the **Design Approach Document [EN010158/APP/5.8]** the design of the Proposed Development has been informed by relevant landscape studies to respond to the local landscape character of the Site (Project Principles 6.1 and 6.2); to respect the historic pattern of the landscape and setting of cultural sites (Principles 6.3 and 6.4); and to retain	N

			existing vegetation within the Order Limits wherever reasonably practicable to retain the fabric of the site (Principle 6.5). **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, significant effects would remain for LCAs 5.7, 7.3 and 9.1. It is acknowledged that residual effects cannot always be mitigated, and such effects will be weighed in the planning balance as part of the decision the Secretary of State will make in deciding whether to grant consent for the DCO Application (see **Planning Statement [EN010158/APP/5.7]**).	
Location of the Proposed Development				
Covenant	National Trust	Comment that National Trust holds restrictive covenants over the land within the Order Limits to the south of Claydon House which restricts any works to the land without prior written consent, and that the Applicant should engage with the	The Applicant is engaging with the National Trust regarding the proposed works (Internal Access Road and Cable Corridor) within the land where it has an interest. It is understood that these works could trigger the covenant and therefore an application for consent was submitted during the pre-	Y

		National Trust to secure consent under the terms of the covenant.	application period. Further information is provided in the Applicant's **Statement of Reasons [EN010158/APP/4.1]**.	
Guidance	National Grid Electricity Transmission Plc	Comment that regard should be had to NGET guidance on development close to overhead lines and underground cables which are protected by a Deed of Easement/ Wayleave Agreement. This includes advice on maintenance of statutory electrical safety clearances, ground levels, approach to planting, excavation works and drilling.	The Applicant and National Grid Electricity Transmission Plc have had regular discussions to seek to co-ordinate the design of the Proposed Development with existing infrastructure owned by NGET. The relevant National Grid standards have been adopted within the design of the Proposed Development for clearances and easements that would be required within the Order Limits, such as Technical Guidance Note 287 Third-party guidance for working near National Grid Electricity Transmission equipment and similar documents. This includes agreements on future investigations to verify asset locations, use of existing and future NGET guidance and feedback into the design. The Applicant also intends to include protective provisions secured in the **Draft DCO [EN010158/APP/3.1]** in order to ensure appropriate protection for NGET assets.	N

Impacts on existing and future assets	National Grid Electricity Transmission Plc	Comment that NGET has lodged a holding objection while engagement is ongoing to understand impacts on existing and future assets. Comment that NGET will require protective provisions within the Order to protect its assets where appropriate.	The Applicant and National Grid Electricity Transmission Plc have had regular discussions to seek to co-ordinate the design of the Proposed Development with existing and future NGET assets. The relevant National Grid standards have been adopted within the design of the Proposed Development design for clearances and easements that would be required within the Order Limits. The Applicant is engaging with NGET on protective provisions for their apparatus and will include the negotiated provisions in the **Draft DCO [EN010158/APP/3.1]** when agreed in order to ensure appropriate protection for NGET assets.	N
Impacts on existing assets	Anglian Water Services	Comment that there is potential interaction with AWS assets, including wastewater assets and water mains which should be identified and protected through further utilities searches and engagement. Recommendations for protective provisions and standoff distances to be developed, and measures included in oCEMP and DEMP. Comment that the nature of other works in the area such as HS2 may mean	The Applicant and Anglian Water Services have engaged extensively throughout the pre-application period to discuss and put in place agreements for all interfaces. This includes agreements on future investigations to verify asset locations and protective provisions for their apparatus. Discussions with Anglian Water Services will continue so any changes to asset locations can be understood and reflected in the final design of the Proposed	N

		locations of assets could change and therefore understanding should be updated prior to works commencing.	Development. The Applicant anticipates including protective provisions for Anglian Water in the **Draft DCO [EN010158/APP/3.1]** once agreed.	
Site selection	Edgcott Parish Council East Claydon Parish Council	Comments that the location of the Proposed Development has not been clearly and convincingly justified, including that it has been retrospectively justified. Other comments felt that the location has been driven by the proximity to the substation, assumption of large-scale solar and convenience of a single landowner rather than appropriateness for solar.	**Appendix 1 - Site Selection Report** of the **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for why the Proposed Development is located in this particular location. This includes commentary on how the Site was selected considering a range of objectives and requirements, including proximity to the National Grid East Claydon Substation, existence of sufficient land to meet the scale of the Proposed Development's aims and the desire to avoid the need for large-scale compulsory acquisitions.	N
Site selection	East Claydon Parish Council	Comment that the Applicant was willing to consider a 10km radius from the grid connection and therefore the rationale of proximity to the substation underpinning this location should not be accepted as an overriding requirement.	Paragraphs 2.10.23 – 2.10.25 of NPS EN-3 establish that the starting point for the site selection process can be determined by the availability of a nearby and suitable connection to transmission network. The Applicant secured a grid connection agreement at National Grid East Claydon Substation, where there was capacity for a new renewable energy project to connect,	N

			as set out within the **Grid Connection Statement [EN010158/APP/7.1]**.	
Topography	East Claydon Parish Council	Query if north-facing slopes of some sections of the Proposed Development are suitable for solar panels, including in relation to landscape and visual impacts, and efficacy of screening.	Sloping land is useful for solar generation, though there is flexibility within the fixed parameters to make adjustments at the detailed design stage to account for the topography e.g. the spacing between the rows of the solar PV panels to account for the angle of the sun. This flexibility is part of the optimisation of the site and contributes to the best use of land available. The EIA undertaken in support of the Proposed Development and presented in the **Environmental Statement [EN010158/APP/6.1 - 6.4]** has taken into account the topography of the Site. This includes the Landscape and Visual Impact Assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**, which recognises that new planting takes time to establish and therefore effects are assessed in year 1 (before planting has established) and year 10 (by which time it is assumed that new planting would have reached semi maturity and hedgerows at least would have fully established). Where the new	N

			mitigation planting would not fully screen the Proposed Development, this is acknowledged as such in **ES Volume 1, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**.	
Need				
Need	Edgcott Parish Council	Comment that the Proposed Development has catalysed other energy projects in the area.	The Applicant respectfully disagrees with this comment. The Applicant secured a grid connection agreement at National Grid East Claydon Substation, where there was capacity as set out within the **Grid Connection Statement [EN010158/APP/7.1]**. Subsequent projects which have been launched which also seek to connect at National Grid East Claydon Substation are not connected to the Proposed Development.	N
Procurement	East Claydon Parish Council	Comment that dependence on equipment from China would not increase energy security.	As set out in the **Statement of Need [EN010158/APP/5.6]**, the delivery of projects like the Proposed Development (being nationally significant low carbon infrastructure) is designated as critical national priority in NPS EN-1 to achieve both energy security and net zero.	N
Noise and vibration				

Construction	Land interest	Comment that there would be a long-term increase in noise levels during construction at Hogshaw Farm and Wildlife Trust - including construction works and traffic.	The construction noise assessment is presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** and considers Hogshaw Farm as a receptor. By adopting the additional control measures (such as the use of Best Practicable Means as defined by the Control of Pollution Act 1974, temporary noise barriers/site hoarding when working in the vicinity of high sensitive receptors and community liaison) outlined in the **Outline CEMP [EN010158/APP/7.2]**, and **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**, it is considered that noise levels from all construction activities would not exceed the daytime threshold criterion of 65 dB $L_{Aeq,T}$ at any of the receptors considered, including Hogshaw Farm, which is threshold daytime noise criterion as defined in BS 5228-1:2009+A1:2014 *'Code of practice for noise and vibration control on construction and open sites. Noise'*. The construction phase traffic assessment is based on the peak of construction traffic, which would occur in the early phases of construction in 2029 (Month 8), therefore providing a reasonable worst-case	Y

			assessment. The effect of construction traffic passing along Claydon Road is predicted to result in a +1.7 dB short-term noise level change. For context, a change of 3 dB would typically be considered as 'just perceptible' under normal conditions. Therefore, the magnitude of impact would be considered low and also temporary.	
PRoW users	Buckinghamshire Council	Comment that PRoW users have not been included as a receptor in the noise and vibration assessment despite being much closer than residential dwellings.	The Applicant has provided commentary on potential impacts on PRoW users from noise and vibration during the construction phase in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** (**Paragraphs 13.8.6** to **13.8.8**). On this basis, PRoW users have been considered as a receptor in the noise and vibration assessment.	Y
Receptors	East Claydon Parish Council	Comment that East Claydon should be included as a receptor in the operational noise assessment.	Noise-sensitive receptors considered within this assessment are summarised in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** (**Table 13.3**). In certain instances, the identified noise sensitive receptors represent a number of dwellings adjacent to or within the proximity of the receptor listed in **Table 13.3**, as it can be reasonably assumed the baseline acoustic conditions and predicted noise levels from the Proposed	Y

			Development would be similar. Receptors Sion Hill Farm, Botolph Claydon and Bernwood Farm are in closer proximity to the noise emitting plant associated with the Proposed Development and therefore are considered to represent properties in East Claydon. However, for completeness a receptor location has been added to the assessment for East Claydon.	
Working hours	Buckinghamshire Council	Request for noisy activities to be constrained to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00) on Saturday.	Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with the host authority. This is secured in the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]**.	Y
Agricultural receptors	East Claydon Paish Council	Comment that it is not agreed that the receptor sensitivity for agricultural activity	For human receptors, the agricultural land is considered to be of a negligible sensitivity to noise, with the exception of	N

		is negligible, due to potential impacts on animals and workers.	the PRoW users. The potential for impacts on ecological receptors within the agricultural land are considered in the biodiversity assessment and have been assigned appropriate receptors sensitivities. For the PRoW, the Applicant has provided commentary on potential impacts on PRoW users (that go through agricultural land) from noise and vibration during the construction phase in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** (**Section 13.8**). The biodiversity assessment is provided in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].** Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works.	
Approach to assessment	Buckinghamshire Council	Comment that the methodology and approach to establish the baseline is supported, but more information needed on data omitted to weather conditions.	The baseline results graphs provided in **Baseline Noise Survey** (**ES Volume 4, Appendix 13.1 [EN010158/APP/6.4]**) highlights the weather affected periods	N

			(such as when rainfall and/or wind speeds greater than 5 m/s occurred) where data was omitted from the assessment at each monitoring location. This is illustrated in the time history figures for each monitoring location as presented in the **Baseline Noise Survey** (**ES Volume 4, Appendix 13.1 [EN010158/APP/6.4]**).	
Approach to assessment	Land interest	Query whether permission was granted for noise monitoring equipment and how noise data has been captured relating to Hogshaw Farm.	The baseline noise survey was undertaken at representative positions (see **ES Volume 3, Figure 13.2: Baseline Survey Locations [EN010158/APP/6.3]**), indicative of the nearest, or most exposed, receptors surrounding the Proposed Development. Baseline measurements were not taken on land belonging to Hogshaw Farm as baseline noise measurements undertaken at Borshaw Farm were considered to be representative of Hogshaw Farm within the assessment. Any references to Hogshaw Farm as a receptor in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** refers to the noise predictions from the Proposed Development only.	N

Approach to assessment	East Claydon Parish Council	Comment that the scope of noise and vibration assessments is too narrow.	The Applicant respectfully disagrees with this assessment. The assessment presented in **ES Volume 1, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** covers the nearest noise sensitive receptors in the vicinity of the Proposed Development (see Section 13.4), as well as the cumulative impact of all noise emitting equipment during the operational (including maintenance) phase (see **T**able 13.18). Therefore, the scope of works is considered to be appropriate. Where appropriate, the results of the noise assessment have also informed other technical chapters of the **Environment Statement [EN010158/APP/6.1 to 6.4]**. This includes **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. The approach taken is considered to be in line with industry best practice.	N
Approach to assessment	East Claydon Parish Council	Comment that use of averaged values (LAeq) does not give the full picture as it is likely that major deviations from these values are likely to occur, causing disturbance to residents and to livestock.	The construction phase assessment methodology and use of L_{Aeq} is consistent with construction noise assessment methodology contained within BS 5228-1:2009+A1:2014 'Code of Practice for Noise and Vibration Control on Construction and Open Sites – Noise' and	N

			is considered appropriate for the Proposed Development. The construction phase assessment has been undertaken in accordance with industry best-practice. The assessment presented in **ES Volume 1, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** has identified there would be not significant impacts, following the implementation of the additional control measures (such as the use of Best Practicable Means as defined by the Control of Pollution Act 1974, temporary noise barriers/site hoarding when working in the vicinity of high sensitive receptors and community liaison). Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works.	
Assessment of human health	Buckinghamshire Council	Comments on the approach to assessing human health impacts in the noise assessment including that it does not reference IEMA 2022 guidance, is not	The **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]** includes assessment (in line with IEMA Guidance) of health-	N

		supported by consultation with stakeholders.	specific effects (mental and physical) arising from the changes to the noise baseline assessed in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**.	
Battery storage and Rosefield Substation	Steeple Claydon Parish Council Land interest	Comments that the noise impact of the BESS and Rosefield Substation should be avoided and mitigated. Specific comments raised concern about impacts on animal wellbeing and visitor experience at Hogshaw Farm and Wildlife Park.	The noise impact of all of the noise emitting plant items associated with the Proposed Development (including the battery storage) is included within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** The assessment includes Hogshaw Farm as a receptor (see Table 13.3). No significant adverse effects at Hogshaw Farm and Wildlife Park are predicted following the introduction of appropriate mitigation measures (including the selection of lower noise equipment, noise barriers and orientation of the equipment).	N
Baseline	East Claydon Parish Council	Comment that the local environment has very low background noise levels and therefore exceedances are unacceptable.	Table 13.18 in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** presents the unmitigated noise levels generated by the Proposed Development. Additional mitigation measures (such as the selection of lower noise equipment, noise barriers and orientation of the equipment) would reduce the noise levels	N

so that there are no exceedances of the criteria.

Regarding the magnitude criteria for the operation (including maintenance) phase, British Standard 4142:2014+A1:2019 *'Methods for rating and assessing industrial and commercial sound'* (BS 4142) advises that where rating levels and background levels are low, which is typically the case in rural areas, the assessment of operational noise should take the absolute noise level into context. It is considered that a rating level of 40 dB $L_{Ar,Tr}$ during the daytime, and 35 dB $L_{Ar,Tr}$ during the night, for the low magnitude impact criteria, would align with guidance in Planning Practice Guidance which defines noise below the lowest observed adverse effect level as follows:

"Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life."

It is noted that the criteria used is for external noise levels and therefore further attenuation below the predicted noise

			levels would be expected within dwellings (see **Paragraphs 13.6.43 and 13.6.47)**.	
Construction	Buckinghamshire Council	Comment that the noise assessment lacks information, including confirmed details about the locations of potential noise-emitting equipment and plans for noise management	The operational assessment has been based on a representative design solution, as set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**. It is anticipated that the noise emitting equipment would be refined as part of the detailed design. This design development may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits. However, this would be in accordance with the parameters secured within the **Works Plans [EN010158/APP/2.3]** and **Design Commitments [EN010158/APP/5.9].** Prospective design solutions would not be progressed if the associated noise levels post-mitigation result in any significant adverse effects. The **Outline CEMP [EN010158/APP/7.2]**, **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** and **Outline OEMP [EN010158/APP/7.3]** provide details of the noise and vibration management plans based on the	N

			assessment results and proposed mitigation measures provided in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**.	
Impacts	East Claydon Parish Council Calvert Green Parish Council	Comment that the noise emitted by the Proposed Development would be intrusive and constant compared to HS2, with specific reference made to BESS and inverters.	The noise impact of all the noise emitting plant items associated with the Proposed Development (including the BESS and inverters) is included within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** No significant effects are predicted during either construction or operational phases post mitigation. Proposed mitigation includes the selection of lower noise equipment, noise barriers and orientation of the equipment.	N
Management Plan	Buckinghamshire Council	Comment that it is expected that a full oCEMP would outline how aspects of nuisance (e.g. noise, vibration, dust) would be controlled.	An **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** includes noise and vibration management measures based on the results of the construction noise assessment in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** It also sets out control measures for dust, based on the air quality assessment presented in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**.	N

Optionality	Buckinghamshire Council	Comment that as the design of the Proposed Development is not final – including the locations of noise emitting elements – comment at this stage is limited and the design should be finalised to inform understanding of effects and appropriate mitigation measures. Other comments state that the noise assessments need to be redone once the design is finalised to ensure confidence in the assessment (e.g. LOAEL and SOAEL ratings).	The operational assessment has been based on a representative design solution, as set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** It is anticipated that the noise emitting equipment would be refined as part of the detailed design. This design development may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits. However, this would be in accordance with the parameters secured within the **Works Plans [EN010158/APP/2.3]** and **Design Commitments [EN010158/APP/5.9].** Prospective design solutions would not be progressed if the associated noise levels post-mitigation result in any significant adverse effects.	N
Mitigation measures	Buckinghamshire Council	Agreement with the need for additional mitigation measures to be developed in adherence with relevant guidance.	**Section 13.9** of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** sets out proposed additional mitigation during construction, operation (including maintenance) and decommissioning. These have been developed with regard to relevant guidance, legislation and policy.	N

Operation				
Lighting	East Claydon Parish Council	Comment that permanent staffing during operation would require on-site lighting during winter months, despite the claim that no areas would be permanently lit.	As outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**, the Rosefield Substation, BESS, Main and Satellite Collector Compounds would not be permanently lit, apart from emergency exit lighting in line with health and safety requirements. Otherwise, manually operated lighting or sensor operated lighting would be utilised and would remain switched off unless operatives are on-site and working during dusk/winter periods. Please refer to section 3.14 in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **Outline Operational Environmental Management Plan [EN010158/APP/7.3]** which secures these environmental obligations with respect to the Proposed Development.	N
Pollution	Edgcott Parish Council	Comment that there could be light, noise, and air pollution from the Proposed Development during operation.	An **Outline Operational Environmental Management Plan [EN010158/APP/7.3]** has been submitted with the DCO Application. This sets out and secures measures to reduce potential environmental effects during operation identified in the **Environmental Statement**	N

			[EN010158/APP/6.1 to 6.4] including those in relation to light, noise and air quality.	
Welfare facilities	East Claydon Parish Council	Query the sources of water, power, drainage to welfare facilities.	Matters pertaining to water supply and wastewater are being agreed with Anglian Water. The Applicant intends to engage with Anglian Water over the course of the examination to develop a Statement of Common Ground. The drainage arrangement for permanent welfare facilities is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11].** The Site would require provision for domestic foul drainage. Due to the rural nature of the site connection to foul sewer may not be feasible although this would be reviewed with Anglian Water, as this initial approach to foul water drainage could be via package treatment works located at each welfare area. Actual foul flows are likely to be small (ca. 24 permanent staff on site), so a package of treatment works with discharge towards a local ditch/watercourse network (if required via drainage field) may be viable. Should the approach not be suitable due to onsite conditions the foul water would be stored in cesspits and these would be managed,	N

			inspected and drained through a licensed carrier who would dispose of the waste offsite. Anglian Water mains water supply would be used at permanent facilities for potable water if available during construction or decommissioning works. Potable water can be supplied to temporary welfare facilities via water bowsers if required. Power supply to welfare units would come through the NGET supply or backup DNO supply to site.	
Policy				
BNG	Steeple Claydon Parish Council	Comment that there is clear planning criteria for a minimum 10% BNG but this has not been followed.	While this is not currently a mandatory requirement for NSIPs, the Applicant has produced a detailed **Biodiversity Net Gain Assessment** (**ES Volume 4, Appendix 7.17 [EN010158/APP/6.4]**) which outlines how the Proposed Development would achieve a minimum 10% net gain in biodiversity using the latest version of the Statutory Biodiversity Metric. Updated UKHab surveys were undertaken of the Site (see **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). This has provided a robust baseline on which the	N

			BNG assessment has been based on. The assessment is also based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6].** On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.	
DCO process	Edgcott Parish Council	The DCO process should not ignore national and local planning policies.	The **Planning Statement [EN010158/APP/5.7]** sets out how the Applicant has had regard to relevant local and national policies and how these have informed the development of the DCO Application.	N
Landscape and visual	Edgcott Parish Council	Comment that the Proposed Development is contrary to the Vale of Aylesbury Local Plan which states applications should address potential adverse impacts, especially in relation to visual impact.	An assessment of potential landscape and visual effects of the Proposed Development is detailed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. This clearly identifies receptors which would experience significant effects and identifies mitigation measures to avoid, reduce, mitigate and/or offset these effects. However, it is acknowledged that residual effects cannot always be mitigated for and where this is the case, such effects have been weighed under the planning balance	N

			section detailed in the **Planning Statement [EN010158/APP/5.7]**.	
Population				
Approach to assessment	Buckinghamshire Council	Comment that the Applicant has used DRMB LA112 guidance which is contrary to the host authority's suggestion to use IEMA 2022 guidance. Comment that the DRMB guidance overlooks the Human Health aspect of that standard.	The Applicant engaged with the host authority on 16 April 2025 and discussed the use of DRMB LA 112 in the context of the assessment on population, as detailed in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. It was agreed that as the scope of the assessment would not include an assessment of health and wellbeing effects, the Applicant would divert from the use of DMRB LA 112 where appropriate. Receptors where DRMB LA 112 guidance is not used include the construction/ decommissioning economy and labour market, the operational (energy) economy and labour market, the agricultural economy, tourism and the tourist economy and agricultural businesses and landholdings.	Y
Impact on TCS Biosciences Ltd	East Claydon Parish Council	Comment that the impact on TCS Biosciences has been dismissed, including its strategic junction to the NHS; that there could be a loss of up to 100	The potential effects on businesses have been considered and detailed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The Applicant has	Y

	local jobs; that the business is dependent on large areas of land.	also designed the Proposed Development in consultation with relevant stakeholders to avoid, reduce and/or minimise the potential for perceived effects on local businesses. In relation to the land used by TCS Biosciences, based on the organisation's feedback to limit disruption the Applicant has: • Removed the option for the project substation and battery storage to be located in Field E23; and • Confirmed in the **Design Approach Document [EN010158/APP/5.8]** that at detailed design stage the solar panels proposed in Field E23 would be designed to incorporate movement corridors for livestock owned by TCS Biosciences to cross the field to access adjacent grazing fields. Potential effects on agricultural and non-agricultural employment and business viability within the Order Limits would be mitigated (or compensated for) through the development of financial compensation and/or land swaps in order to provide continuity for employment and socio-economic activity where possible.

			With the application of the outlined mitigation measures, the Applicant considers that with there would not be a significant effect on the operations of TCS Biosciences.	
Study area	East Claydon Parish Council	Comments about the 500m study area including that interdependencies of local communities has been ignored, that the irregular shape of the Order Limits results in discrepancies e.g. Granborough.	The Applicant recognises that a blanket 500m study area is not appropriate for the assessment, and has extended the study area to include community-level areas based on administrative (parish) boundaries as part of its population assessment, including Granborough detailed in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The assessment recognises the importance of inter-dependencies between settlements within this community study area, for example in terms of accessibility for walking, cycling and horse riding to enable social mobility, recreation and access to community and commercial facilities.	Y
Assessment of human health	Buckinghamshire Council	Comment that the socio-economic statement should inform the impacts of the scoped matters (agricultural loss, construction workers, spend and impacts from temporary workers) on determinants	In line with the Scoping Opinion (**ES Volume 4, Appendix 5.1: EIA Scoping Opinion [EN010158/APP/6.4]**) the loss of agricultural land, construction employment and construction workforce spending and	N

		of health affecting the existing and affected population.	GVA are scoped into the population assessment (**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**) and therefore a separate Socio-Economic Statement has not been produced. In addition, the Applicant has produced a **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) which details the likely human health effects of the Proposed Development based on the effects reported within the **Environmental Statement [EN010158/APP/6.1 to 6.4]** where these are relevant to human health. Section 3.7 of the **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) assesses the health impacts related to socio-economic effects, with social participation, cohesion, interaction and support, education and training and employment and income being identified as the key health and wellbeing determinants of relevance. This includes the population assessment.	
Baseline	Buckinghamshire Council	Comments on the baseline data, including that the Applicant should reference 2021 Census data, that	Section 12.5 of the population assessment (**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**) sets out the	N

vulnerable populations should be analysed and that the host authority should be engaged.

environmental baseline which has informed the assessment. This was developed using 2021 Census data, alongside other relevant data sources including the ONS Annual Population Survey (2024), UK Business Counts (2023), English Indices of Multiple Deprivation (2019), ONS Estimates for Regional Gross Value Added (GVA) (2022), DFE Apprenticeships and Traineeships Data (2025), DEFRA data on the structure of the Agricultural Industry in England (2025) and Buckinghamshire Council Public Rights of Way data.

The baseline also includes reference to vulnerable populations. Vulnerable populations and Protected Characteristics have also been considered in more detail (including baseline conditions) as part of the **Equality Impact Assessment [EN010158/APP/7.12]** and **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**). The vulnerable population groups identified as part of the **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) include children and younger people, elderly people, social disadvantaged people (e.g. low income,

			those experiencing discrimination, people with existing poor health, and people with access and geographical factors (e.g. unemployed or shift workers that may spend more time at home).	
General comment – population	East Claydon Parish Council	Comment that the Applicant has not had regard to local residents.	The Applicant has had regard to the feedback received from the local community throughout the pre-application period, as evidenced in the following **Appendices** to the **Consultation Report [EN010158/APP/5.2]**: • **A-4: Summary of responses to Phase One Consultation and consideration by topic** • **J-1: Summary of s42(1)(a), (b) and (d) responses to Phase Two Consultation and consideration by topic** • **J-2: Summary of s42(1)(a), (b) and (d) responses to Phase Two Consultation and consideration by topic** • **K-3: Summary of responses to targeted consultations and consideration by topic**	N

Impact of changes to footpath network	Buckinghamshire Council	Comments about the impacts on changes to the existing footpath network	A link-level assessment has been undertaken to assess the changes to each individual link (as determined by the Buckinghamshire Definitive Map) where links interact with or are affected by the Proposed Development for any part of its length. This is considered in the context of embedded mitigation (via diversions, new or alternative links both permanent and temporary) that would be provided as part of the Proposed Development as diverted/replacement PRoW, and which would be subject to the commitments in terms of delivery, design and maintenance which are set out in the **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8]**. The assessment primarily considers where connectivity in terms of journey distance is changed as a result of the Proposed Development, in the context of replacement and alternative access during both the construction/decommissioning and operation (including maintenance) phases.	N
Impact on agricultural businesses	Buckinghamshire Council	Comments expressing concern over agricultural land impacts reported the PEIR including on farmers' mental health,	It is important to note that potential effects on agricultural and non-agricultural employment and business viability within	N

	East Claydon Parish Council	the cumulative impact of land loss of agricultural land and farming viability, and the social value of the land.	the Order Limits would be mitigated (or compensated for) through the development of financial compensation and/or land swaps in order to provide continuity for employment and socio-economic activity where practicable. **Section 3.7** of the **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) summarises how the Applicant has considered potential human health effects of the Proposed Development as part of its socioeconomic assessments (detailed in **Volume 1, Chapter 14: Population [EN010158/APP/6.2]**). This includes discussion of impacts on agricultural operators. **Chapter 5** of the **Health and Wellbeing Summary Statement (ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) provides commentary on mental health and wellbeing and how this has been considered in the design of the Proposed Development.	
Impact on East Claydon	East Claydon Parish Council	Comment that the community of East Claydon would be disadvantaged by the Proposed Development.	The Applicant has demonstrated how the Proposed Development would not result in significant environmental effects on East Claydon during its lifetime, in **ES Volume**	N

2, Chapter 14: Population [EN010158/APP/6.2].

A benefit of the Proposed Development of relevance to East Claydon is the creation of new permissive paths that would increase both community accessibility and recreational opportunities in an area that is currently inaccessible. These routes would improve community connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west.

ES Chapter 14: Population [EN010158/APP/6.2] highlights the wider benefits that the Proposed Development would bring to local communities surrounding the Proposed Development in regards to employment, workforce spending and GVA/supply chain benefits, which are as follows:

- 420 to 470 net additional FTE jobs per year of construction within the Construction Labour Market Area (CLMA), and 180 in the CLMA Focus Area;
- £28.5m and £12.2m in the form of construction GVA within the CLMA and

the CLMA Focus Area per year, respectively;

- £1.9m on average per year in the form of construction workforce spending;
- 18 net additional operational FTE jobs within Buckinghamshire;
- £74,000 on average per year in the form of operational workforce spending.

The **Planning Statement [EN010158/APP/5.7]** also highlights the wider benefits that the Proposed Development would bring to the local community and the economy, including:

- proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of Public Rights of Way (PRoWs);
- the creation of three permissive paths;
- a Community Benefit Fund reflecting £400 per megawatt per year from the start of operation and lasting throughout the operational lifetime of the Proposed Development; and
- an Education and Skills Fund to increase opportunities in the renewable

			and sustainable development sector, with a sum of £50,000 set to be allocated annually from the Date of Commencement until the Date of Decommissioning.	
Impact on Hogshaw Farm and Wildlife Park	Land interest	Comment that the Proposed Development would have a detrimental impact on Hogshaw Fam and Wildlife Park, including business viability and job security of employees.	The potential effects on businesses have been considered and detailed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The Applicant has also designed the Proposed Development in consultation with relevant stakeholders to avoid, reduce and/or minimise the potential for perceived effects on local businesses. In relation to Hogshaw Farm and Wildlife Park, based on the organisation's feedback to limit disruption the Applicant has proposed dense woodland planting to the eastern boundaries of Field D8, D9 and D19 to screen views from Hogshaw Farm and Wildlife Park. The assessment within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** considers how the operational characteristics (and therefore viability and employment security) of businesses may be affected by environmental and access changes as a	N

			result of the environmental effects of the Proposed Development, concluding no overall significant effect.	
Impact on residential properties	East Claydon Parish Council, Preston Bissett Parish Council	Comment that the assessment ignores impacts on residential properties within or adjacent to the Order Limits.	The Planning Inspectorate confirmed in its **EIA Scoping Opinion** (**ES Volume 4, Appendix 5.2 [EN010158/APP/6.4]**) that an assessment of effects on private property and housing (or evidence demonstrating agreement with relevant consultation bodies and the absence of a likely significant effect) should be included in the ES. As a result, these matters were scoped into the assessment. As detailed within the population assessment (**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**), no existing or proposed/planned residential property would require demolition or become undeliverable as a result of the Proposed Development, and no property would become uninhabitable as a result of residual significant environmental effects. Effects in terms of environmental amenity change for residential receptors were assessed within **ES Volume 2, Chapters 6, 10 and 13 [EN010158/APP/6.2]**.	N

Impact on tenant farmers	East Claydon Parish Council Calvert Green Parish Council	Comments that the eviction of tenant farmers should be considered a significant effect.	The Applicant has assessed the potential socio-economic effects of the Proposed Development on agricultural businesses and landholdings (see **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**). Potential effects on agricultural and non-agricultural employment and business viability within the Order Limits would be mitigated (or compensated for) through the development of financial compensation and/or land swaps in order to provide continuity for employment and socio-economic activity where practicable. With this applied, the Applicant considers that there would not be a significant effect on agricultural businesses and landholdings as a result of the Proposed Development.	N
Impact on tourism	East Claydon Parish Council, Land interest	Request for the Applicant to demonstrate how impacts on local tourism and visitors to the area has been considered.	The Applicant has assessed the potential for effects on tourism and the tourist economy as a result of the Proposed Development within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**, as required by NPS EN-1 paragraphs 5.13.4 and 5.13.6, taking into account the environmental effects reported in the **Environmental Statement [EN010158/APP/6.1 to 6.4]**. The Applicant does not consider there to be evidence of	N

			significant effects on tourism arising from the proposed Development that (in accordance with NPS EN-1 paragraph 5.13.10 which suggests that limited weight should be given to assertions of socio-economic impacts that are not supported by evidence.	
Public Rights of Way and permissive footpaths				
Approach to footpaths	Steeple Claydon Parish Council	Comment that where possible PRoWs should be linked up and should form a loop. Suggestions include: 1. PRoWs should be linked across Calvert Road with PRoW towards Rosehill Farm and Poor Piece Wood. 2. PRoW from Calvert through B76541 back to Calvert should form a loop. PRoW from Calvert through B7-6-5-4-1 back to Calvert should form a loop. Where the PRoW ends on Calvert Road near the HS2 compound a combined cycle-footpath should be put in place over the HS2 railway bridge line into Calvert. Ideally this same foot-cycle path should link up in the other direction of Calvert Road toward the foot-cycle path on Addison Road which unfortunately terminates at the end of Addison Road going nowhere. In general, this project should be used as an	Discussions have been held between the Applicant and Buckinghamshire Council in relation to opportunities to permanently divert some of the PRoW within the Order Limits. Within Parcel 1, the closest PRoW to Addison Road would be diverted to provide a connection to the new HS2 footway. In addition, permissive routes have been incorporated in Parcel 1 that would allow circular routes to connect to the PRoW network north of Calvert Road, towards Rosehill Farm and Poor Piece Wood. The suggested cycle-footpath over the HS2 bridge to Calvert includes land that is outside the Order Limits of the Proposed Development, over which the Applicant has no control.	Y

		opportunity to reroute PRoW so they are linked up better without the use of stretched of busy roads with speedy car traffic.	Details of the proposed changes to PRoW and permissive routes are set out within the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	
Existing footpaths – SCL/13/2	Buckinghamshire Council	Comment that the diversion would be less convenient when travelling from Calvert and Addison Road as there may be a need to walk along the road to connect up to SCL/13/1 and SCL/13/2. Other comments acknowledge the benefit of enhancing travel north to south along SCL/8/1. Suggestion that a connection could be retained to the northern exit of SCL/12/2 and SCL/13/1 with Calvert Road using a route behind the southern highway boundary hedge.	Following discussions with the PRoW team at Buckinghamshire Council, amendments have been made to the proposed PRoW diversions in Parcel 1. The proposed diversion of SCL/12/2 and SCL/13/1 now includes a stretch that runs to the south of proposed planting along the southern edge of Calvert Road, connecting to Calvert Road at the current northern exit of SCL/12/2 and SCL/13/1 and retaining the proposed exit close to SCL/8/1. The proposed changes to the PRoW within the Site are shown on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and described further in the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]**.	Y

New footpaths – Knowl Hill	Buckinghamshire Council	Comments on the proposed new footpath between Shrubs Wood and Three Points Lane, including that it is a significant improvement in access to the local countryside and would allow for several off-road circular walks from nearby settlements and that there are reservations regarding its permissive status as this could be revoked at any time. Suggestion the route is upgraded to a PRoW.	Following Phase Two Consultation, further enhancement to the proposed permissive footpath have been added to create additional linkages to the PRoW network north of Calvert Road. However, the operational life of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO [EN010158/APP/3.1]**. The permissive footpaths are a benefit associated with the Proposed Development and would therefore be in place for the operational lifetime. The permissive footpaths would be retained or removed at the discretion of the landowner post-decommissioning.	Y
Enhancements	Buckinghamshire Council	Comment welcoming commitment to providing enhancements to the footpath network through measures such as improved signage or surface upgrades.	The Applicant thanks the respondent for their comment. Details of the proposed changes to PRoW and permissive routes are set out within the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	N
Existing footpaths	Buckinghamshire Council	Comment that permanent legal diversions would need to be secured through the DCO and would need confirmation that	The PRoW proposed to be permanently closed and diverted are identified on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and secured in	N

	no unseen maintenance liability would be inherited.	Schedule 6 of the **Draft DCO [EN010158/APP/3.1]**. As secured in the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8],** any new or diverted PRoWs implemented by the Applicant shall be designed in accordance or with regard to design standards adopted by Buckinghamshire Council, and be approved by Buckinghamshire Council in that regard before they are implemented, with accordance to those standards reviewed and approved on completion prior to adoption of any new or diverted PRoW into the local highway network. Details such as surfacing of routes would be discussed with and approved by Buckinghamshire Council to create an appropriate high-quality network. The provisions of the dDCO provide for maintenance to be undertaken for any newly created public highway including public rights of way by the undertaker for the first twelve months before becoming the responsibility of the local highway authority.

Existing footpaths - diversions	Buckinghamshire Council	Comment that in principle the host authority would prefer for infrastructure to be designed around footpaths but it is recognised that this may not be attractive.	The Applicant has designed the Proposed Development around the existing PRoW that cross the Site, incorporating them within corridors of green and blue infrastructure. The Applicant has identified stretches of five PRoW to be diverted. These diversions would be to better connect the local network of piecemeal PRoWs whilst also minimising the extent to which PRoWs interact with the Proposed Development. Where PRoW are proposed to be diverted the Applicant has ensured that the routes would be enjoyable, provide enhanced links to the surrounding PRoW network where applicable and would not result in lengthy additions to the PRoW. The proposed changes to the PRoW within the Site are shown on the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and described further in the **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8]**.	N
Existing footpaths – ECL/4/2	Buckinghamshire Council	Comment that the proposed diversion is generally acceptable, subject to clarification that the proposed diversion does not pass through an area of increased flood risk.	This has been noted. The proposed diverted footpath does not pass through an area of increased flood risk compared to the existing alignment.	N

Impacts of construction	Buckinghamshire Council	Comment that the southern option for the cable route between Parcels 1 and 2 is preferred from a rights of way perspective as it does not appear to impact any PRoW.	The northern option for the cable route has been selected following careful consideration of all the relevant environmental constraints. However, as set out in the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and described further in the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]**, there would be no closures of PRoW during construction and the Applicant would manage continuous use of the PRoW by temporary short diversions during the construction phase. Once operational, there would be no disturbance to the PRoW crossing the Interconnecting Cable Corridor.	N
New footpaths – Knowl Hill	Buckinghamshire Council	Suggestion that an additional link to the proposed new footpath should be added for walkers accessing from the south and south-east.	Creating an additional link to the proposed permissive route from the south and south east, to link to MCL/17/1 and/or MCL/18/1 at Knowlhill Farm, would require the route to cross land outside the main developable area and only available to the Applicant for cabling and/or construction and maintenance access. It is therefore not possible to provide this link.	N

New footpaths	HS2	Comment requesting clarification whether the proposed changes to the existing PRoW alignment have taken into account the approved HS2 Sch17 PRoWs in this area.	The proposed diversions of the existing PRoW have taken into consideration the HS2 Schedule 17 works to PRoW. None of the proposed HS2 works extend into the Order Limits and all proposed changes to PRoW as part of the Proposed Development connect back into the existing PRoW network at the Order Limits. Therefore, the routes would be on their current alignment at the interface with the HS2 works. Details of the proposed changes to PRoW are set out within the **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	N
New footpaths	HS2	Query whether PRoWs cutting through the site would be accessible without a gate to support seamless movement from proposed PRoWs re-provided by HS2 around the Sheephouse Wood Bat Mitigation Structure.	There is no intention to introduce any gates along the PRoW. Details of the proposed changes to PRoW are set out within the **Outline of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	N
New footpaths	National Trust	Comment welcoming proposals for the creation of off-road multi-user trails linking	While the Applicant has no control over areas located outside the Order Limits, discussions have been held between the	N

		Claydon to neighbouring communities and the Buckinghamshire Greenway.	Applicant and Buckinghamshire Council in relation to the Buckinghamshire Greenway. Details of the proposed changes to PRoW and permissive routes are set out within the **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	
New footpaths	Steeple Claydon Parish Council	Comment welcoming new footpaths as part of the Proposed Development. Specific reference made to the derivation of the PRoW near Pond Farm and the connection to Knowl Hil.	The Applicant notes this comment and thanks the respondent for their feedback.	N
Offsets	Buckinghamshire Council	Request for greater clarity regarding available widths of the PRoW in light of offsets from fence line as the Council would not wish to inherit the burden of maintaining these full widths and these should be managed by the Applicant. Suggestion that the maximum usable width for shared pedestrian, cycling and horse-riding routes would be around 7m.	Existing PRoW would have a minimum 10m offset to the perimeter fencing surrounding the Solar PV development. It is not intended to alter the existing surfacing or available width of any PRoW within these corridors. However, the Applicant would ensure that all existing proposed and diverted routes within the Order Limits are accessible and well-maintained in terms of vegetation management, clearance of obstructions and flooding /waterlogging. This is secured by the **Outline RoWAS [EN010158/APP/7.8]**.	N

Outline Rights of Way Management Plan	Buckinghamshire Council	Comment that the intended widths and surfaces of each PRoW within, adjacent to, or intersecting the Order Limits should be recorded.	The majority of existing PRoW and permissive paths comprise unsurfaced public footpaths or public bridleways, with the exception of ECL/10/2 to ECL/10/5 which is a surfaced public bridleway that largely follows Splash Lane/Three Points Lane (bridleway), along the western boundary of Parcel 2. It is not intended to alter the existing surfacing or available width of any PRoW within the Order Limits. The permanently diverted PRoWs would reflect an equivalent design to the existing PRoWs that they are replacing, based on user requirements. This is secured by the **Outline RoWAS [EN010158/APP/7.8]**.	N
Stiles	Buckinghamshire Council	Comment that all stiles within the Order Limits should be reviewed with accessible gates replacing these where stock control is required to increase accessibility, or a gap where this is not.	The **Outline LEMP [EN010158/APP/7.6]** requires stiles and gates to be checked to ensure they are safe and operationally effective. This would be further assessed at the detailed design stage.	N
Suggestion	Buckinghamshire Council	Suggestion for a new section of bridleway within the Order Limits through the upgrade of QUA/38/1 to bridleway and diverted, this could connect to Bridleway ECL/10/5 which is a dead end at Coppice Lowhill Farm near Runt's Wood.	The operational life of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO [EN010158/APP/3.1]**. Upgrading footpaths to bridleways would require a permanent change to be in place beyond	N

			the operational lifetime of the Proposed Development, which is not in the control of the Applicant.	
Suggestion	Buckinghamshire Council	Suggestion that an upgrade of Footpath ECL/7/1 to bridleway, up to the adopted vehicular highway extent on Weir Lane, would be a significant enhancement to local access and safety.	The operational life of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO [EN010158/APP/3.1]**. Upgrading footpaths to bridleways would require a permanent change to be in place beyond the operational lifetime of the Proposed Development, which is not in the control of the Applicant.	N
Surfaces	Buckinghamshire Council	Comment welcoming surface upgrades where these are sensitive to different users, recommending permeable resin bound stone surfaces. Comment that this could improvement the drainage of footpaths to prevent mud in winter. Specific comment welcomed the upgrade of Bernwood Jubilee Way.	It is not intended to alter the existing surfacing of any PRoW within the Order Limits and the permanently diverted PRoWs would reflect an equivalent design to the existing PRoWs that they are replacing, based on user requirements. This is secured by the **Outline RoWAS [EN010158/APP/7.8]**. A new permissive footpath across Parcel 2 would connect the Bernwood Jubilee Way to Splash Lane/Three Points Lane (bridleway) as an alternative route during wet conditions.	N
Transport and access				

AIL	East Claydon Parish Council	Comment that no details as to the site access for AILs has been provided.	Following Phase Two Consultation, the Applicant defined the location of the temporary AIL access junction on East Claydon Road. The access junction has been fully assessed within the transport assessment presented in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. Measures to control AIL traffic are set out in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**.	Y
A41	Buckinghamshire Council	Comment that there is insufficient detail about potential traffic impacts on the A41, including where flows are anticipated.	Potential traffic impacts on the A41 are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. This includes details about the locations of the traffic counts, development traffic flows and potential traffic impacts.	N
Agricultural vehicles	East Claydon Parish Council	Query how construction traffic would be managed during peak periods of movement of large agricultural vehicles.	As detailed in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** the Applicant would create a protocol for working with local businesses to ensure that construction traffic does not interfere with normal business traffic where practicable. This would include agricultural businesses.	N

AIL	Buckinghamshire Council	Comment that AILs will be subject to separate bespoke requirements subject to consultation with relevant consultees.	The Applicant agrees with this statement and would seek to agree these requirements with relevant consultees prior to construction.	N
AIL	East Claydon Parish Council, Winslow Town Council	Comment that the proposed AIL route would involve major disruption to Winslow residents and traffic, especially gas this is the chosen AIL route for all of the proposed electrical infrastructure planning applications currently being considered in the area. Query if Winslow residents have been consulted on cumulative impacts of disruption. Request for Winslow Town Council to be involved in discussions about potential junction works.	The proposed AIL route is part of the National Highways approved AIL route network. Approximately 7 inbound AIL movements would be required during the construction phase of the Proposed Development. The Applicant would manage any delivery of AIL in line with its commitments as set out in Section 5 of the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. This includes the use of civilian and police escorts and publication of planned AIL movements to residents and media outlets. Given the low number of predicted AIL movements, no cumulative effects on Winslow residents are expected in relation to transport and access. As part of its Phase Two Consultation (which included consultation with the local community), the Applicant published a Preliminary Environmental Information Report (**Appendix I-1** of the **Consultation Report [EN010158/APP/5.2**) which set out the potential effects of the Proposed	N

			Development. This included any cumulative effects. Consultation activity is described in detail in **Consultation Report [EN010158/APP/5.1]**.	
Approach to assessment	National Highways	Comment that justification for the use of the National Road Traffic Forecast low growth factor should be provided before these can be confirmed as acceptable.	As detailed in the **EIA Scoping Report** (see **ES Volume 4, Appendix 5.1 [EN010158/APP/6.4]**, the Applicant has used the National Road Traffic Forecast low growth factor to determine base year traffic flows. Low growth is appropriate as it provides realistic growth in rural areas where the number of new commercial and residential developments are limited.	N
Approach to assessment	National Highways	Comment that collision data from 2020 and 2021 should not be used due to the abnormalities of the COVID-19 pandemic. Request for the five-year period used to be extended to reflect the removal of these years in the ES.	The five-year period used is a standard measure and provides an accurate understanding of baseline traffic accidents. This approach has been utilised on similar NSIP-scale solar projects and is therefore considered appropriate for this assessment.	N
Approach to assessment	National Highways	Request for collision analysis to be undertaken at each junction within the study area, as well as the connecting road links between junctions. Request for the highway safety review to examine the baseline collision data and	The Applicant has engaged with National Highways to confirm the extents of the requested assessment. The level of traffic impact on the SRN is minor and therefore it is not considered that this level of information is required.	N

		identify areas where there is a concentration of collisions.		
Approach to assessment	National Highways	Request that the net increase in peak hour movements at each of the SRN junctions be provided in the ES.	The construction traffic generation (in relation to the Proposed Development) affecting the SRN is provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. The level of traffic on the SRN throughout a typical day would be 30 cars/LGV and 32 HGV. This level of traffic is significantly below assessment thresholds and as such no further information is considered necessary.	N
Approach to assessment	National Highways	Request for junction capacity assessments be undertaken at any Strategic Road Network junctions that experience an increase of more than 30 vehicles in a peak hour.	The traffic generation (in relation to the Proposed Development) affecting the SRN is provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. The level of traffic on the SRN throughout a typical day would be 30 cars/LGV and 32 HGV per day. This level of traffic is well below assessment thresholds and as such no further information is considered necessary. The thresholds for undertaking junction assessments are not met by the Proposed Development.	N

Approach to assessment	Buckinghamshire Council	Comments that no junction modelling or assessment has been provided to demonstrate that there is sufficient operating capacity, including the junction of the A41/Station Road.	The traffic impact of the Proposed Development is provided **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. The peak of the construction traffic flows would occur outside of network peaks and as such peak junction assessments aren't required.	N
Approach to assessment	Buckinghamshire Council	Comment that the traffic flows provided do not compare against theoretical link capacity of the roads they relate to.	A theoretical road link capacity review has been undertaken as part of the **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**. This indicates that ample spare link capacity exists across the study area to accommodate the temporary uplift in traffic associated with the Proposed Development.	N
Approach to assessment	National Highways	Request to be provided with all AIL vehicle sizes and axle loading to assess the risk to the SRN.	Vehicle details are provided in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** in **Annex 3**.	N
Approach to assessment	Steeple Claydon Parish Council	Comment that the Applicant has underestimated impacts from construction traffic on the local road network.	The Applicant has fully assessed the potential impacts of the Proposed Development on the local road network during the construction phase. Full details are provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. The magnitude of	N

			impact to all receptors has been classified as minor and restricted to the short term of the construction phase only. No residual effects are anticipated.	
Approach to assessment	East Claydon Parish Council	Comment disagreeing with the conclusion that impacts of construction traffic would not be significant.	The Applicant respectfully disagrees with this comment. The assessment undertaken and detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** is robust and demonstrates that the impacts are not significant. The assessment is in line with the Institute of Environmental Management and Assessment (IEMA) Guidelines, "Environmental Assessment of Road Traffic and Movement", published in 2023 and has been reviewed against the criteria specified in the published guidance.	N
Assessment of human health	Buckinghamshire Council	Comments on the approach to assessing human health impacts in the transport assessment including that it does not reference IEMA 2022 guidance, is not supported by consultation with stakeholders and that it does not consider determinants of human health within identified receptor groups (e.g. users of PRoW and public roads, residents living along access route).	The **Health and Wellbeing Summary Statement** (**ES Volume 4, Appendix 5.5 [EN010158/APP/6.4]**) includes assessment (in line with IEMA Guidance) of health-specific effects (mental and physical) arising from changes to transport and access from the Proposed Development as assessed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. This includes users of PRoW and public roads, as well as local	N

			residents living in the vicinity of the Order Limits.	
Claydon House	National Trust	Comment that the proposed construction route would lead to a significant increase in traffic on Claydon Road during the construction period which is not raised in the CTMP. Specific comments raised relate to resultant impact on revenue due to travel disruption and discouragement of visitors, suggested inclusion of a representative of the Trust on the Traffic Management Group and liaison to prepare a diary of local community events.	Claydon Road would experience a total traffic increase of less than 30% (23.68%), which is not significant in EIA terms, as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2].** The National Trust's website for Claydon House[2] notes that the recommended access route is as follows: *"signposted A413 (Buckingham), A41 (Waddesdon crossroads). M40 junction 9 (Bicester) follow A41, turn off to Grendon Underwood and Calvert, signposted from Calvert Crossroads".* This route from the A41 is not used by construction traffic as noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**. As such, there is no impact to visitors using the signposted route and traffic levels would not lead to congestion to Claydon House during peak periods for this property. The **Outline Construction Traffic Management Plan (CTMP)**	N

			[EN010158/APP/7.5] includes provision for the Principal Contractor to liaise with the host authority to prepare a diary of local community events. Where possible, HGV traffic flows would avoid moving on these days. Accordingly, the Applicant considers that the inclusion of a National Trust representative on the traffic group is not necessary.	
Claydon Road	East Claydon Parish Council National Trust	Comment that there would be a significant effect on users of Claydon Road as a result of increased traffic flow.	The Applicant respectfully disagrees with this comment. Claydon Road would experience a total traffic increase of less than 30% (23.68%), which is not significant in EIA terms, as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2].** The Applicant has proposed widening works on Claydon Road to the east of Shipton Lee to improve traffic movements, as noted in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**.	N
Claydon Road/ Granborough Road	East Claydon Parish Council	Comment that information is required about how vehicles would negotiate the hairpin turn from Claydon Road into Granborough Road to access Parcel 3.	Details of how vehicles would access the Site are provided in the wider access strategy, detailed in **ES Volume 4, Appendix 15.1: Transport Assessment**	N

			[EN010158/APP/6.4]. No right turn is required.	
Claydon Road / Quainton Road	East Claydon Parish Council	Comment that the junction between Quainton Road and Claydon Road has poor visibility and has high accident potential.	The online, independent resource Crashmap.co.uk does not show any accidents at this location in the past seven years. Only one accident is recorded at this junction in the last ten years. This was "slight" accident involving a motorcycle in 2016. No other incidents have been reported.	N
Data presentation	Buckinghamshire Council	Comment that tables of data should be presented with greater clarity as to the units that the data relates to (flow per unit time).	All data is presented as vehicles per day. Data in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** is divided into Car & LGV traffic, HGV traffic and total traffic categories. The Applicant considers that this is the most effective way to set out the relevant information.	N
Disruption	East Claydon Parish Council	Comment that disruption to local traffic has been underestimated.	The Applicant respectfully disagrees with this comment. The increase has been correctly and robustly assessed and is not significant in EIA terms. More information is available in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2].**	N

Embedded mitigation	Buckinghamshire Council	Agreement with proposed embedded mitigation measures.	This is noted. The **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** summarises all proposed mitigation measures.	N
Enforcement	Buckinghamshire Council	Request for more information on enforcement measures to ensure vehicles stay on the proposed construction route and the assessment is robust.	The **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** outlines proposed traffic management measures. This includes the formation of a Traffic Management Group, use of GPS trackers for regular HGV traffic, and the use of a visible vehicle identification system. Failure to follow the proposed measures would be a non-compliance matter and could result in contractors being subject to penalties and individual sanctions. The contract with the Principal Contractor would include a requirement for the CTMP to be included as a deliverable measure within the contract. A CTMP coordinator would be appointed on Site during the construction phase.	N
Horses	East Claydon Parish Council	Comment that horses grazing in adjacent fields may be sensitive to construction traffic and this should be considered as well as horse riders.	The effects on equestrians is considered as a grouping with pedestrians and cyclists within **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4].** Following the	N

			implementation of mitigation measures, no significant effects are predicted. Mitigation measures to reduce and avoid noise and air quality impacts which may impact horses and horse riders, are detailed and secured in the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4].** HGV and agricultural traffic already use the proposed access routes, and the increase in traffic levels, following mitigation are not considered significant and would not result in long term, residual effects.	
HS2	Buckinghamshire Council, Quainton Parish Council	Comment that information about how the Proposed Development relates to HS2 should be included within the Transport Assessment (e.g. nearest access point to the HS2 works area).	The access junction locations are clearly shown in the access junction plans and within the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. The traffic assessment presented in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** includes traffic growth assumptions for HS2 traffic flows. Data is not publicly available and, as such, the existing HS2 flows operating at the time of the traffic surveys have been retained and made subject to traffic growth	N

			assumptions to provide a robust assessment. As detailed in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** the Principal Contractor would consult with the HS2 Transport Officer to coordinate haulage operations on the access routes during the construction period.	
Mitigation measures	Buckinghamshire Council, Quainton Parish Council	Comments that there is a need for detailed plans, enforcement measures and further consultation to develop effective mitigation measures for potential highways impacts. This includes the construction route, details of road crossings by HGVs and avoidance of sensitive routes.	The mitigation measures referred to are all set out in **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**.	N
Recreational users	East Claydon Parish Council	Comment that the area is popular with cyclists and walkers using the road network. Comment that it is not sufficient to examine NCN routes as a measure of the potential impact on cyclists.	All road users including cyclists and walkers/pedestrians have been considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**.	N
Routing	Buckinghamshire Council	Agreement that routing which avoids residential areas is preferred.	The Applicant agrees with this statement and has sought to limit effects on communities from traffic wherever possible. This has involved designing a	N

			route which avoids local villages. These routes would be secured via the **Outline Construction Traffic Management Plan [EN010158/APP/7.5].**	
Road conditions	East Claydon Parish Council	Comment that the traffic from the Proposed Development would cause major damage to road surfaces and margins due to the relative impact of HGVs compared to cars.	During the construction phase, a general road wear and tear review would be undertaken with Buckinghamshire Council every three months, with interim reviews undertaken by the Applicant's contractor on a weekly basis. The **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** sets out the Applicant's proposed approach to the adoption of a Wear and Tear Agreement, which would be a legal agreement with the host authority. This would cover potential damage to the public road network within the proposed construction route, verges and structures as a result of the Proposed Development. It would be based upon condition surveys of the road. Any immediate necessary repairs would be coordinated within the host authority. Any damage caused by traffic associated with the Proposed Development that would be	N

			hazardous to public traffic would be repaired immediately.	
Road conditions	Buckinghamshire Council	Comment that the Transport Assessment should set out details for any proposed works to address structural highways issues, with specific reference to Snakes Lane/Fidlers Field.	The **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** notes the current poor condition of Snakes Lane/Fidlers Field and the requirement for reconstruction work. Should the road be in its current condition (or worse) when the Proposed Development is scheduled to begin construction, the Applicant would agree to undertake road improvements.	N
Road conditions	Buckinghamshire Council	Agreement in principle with localised widening and passing places on Granborough Road, and request for further detail about potential plans including swept path drawings. Comment seeking right to restore the road to its original condition following construction to prevent anti-social behaviour.	Plans illustrating the proposed works (including at Granborough Road) are included in **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. These would be removed and the verge restored to its original condition, following the completion of construction works. The **Draft DCO [EN010158/APP/3.1]** outlines how road improvements and their potential removal following construction would be controlled and approved.	N
Road safety	East Claydon Parish Council	Comment that the impact on road safety has been underestimated.	The Applicant respectfully disagrees with this statement and maintains that the safety of all road users has been appropriately and robustly considered in	N

		Specific reference to site access points on Claydon Road and the blind junction of Claydon Road and Granborough Road, and impact on cyclists/walkers using the network.	**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2].** The Granborough Road junction is accessed by the access junction on Claydon Road as noted in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5].** No traffic would be turning right at this junction.	
Site access	East Claydon Parish Council	Query how the site would be accessed during decommissioning should the National Grid Substation be constructed at the proposed access point.	The proposed public road access junctions described in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** would remain in place for the operational and decommissioning phases.	N
Staff movements	Buckinghamshire Council	Request for more information on potential impacts from staff movements on the southern section of the A41 (junction of A41/Paradise Orchard/ Martin Dalby Way).	The impact of construction traffic to the east of the A41/Station Road junction is less than 1% as noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**. This level of traffic is unlikely to have any significant effect on the operation of the road network.	N
Staff movements	Buckinghamshire Council	Comment that a staff travel plan should be submitted with the DCO and provide comfort that the travel rates within the Transport Assessment can be adhered to.	This information is included in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** which would be secured by a requirement in the DCO (see **Draft DCO [EN010158/APP/3.1]**).	N

Staff movements	East Claydon Parish Council	Queries about assumptions regarding construction staff, including: • how routes taken by staff can be known at this stage • how sustainable travel measures would be enforced • how originating locations of materials and construction staff is justified. • how staff and materials originating from Aylesbury would travel to site and whether this would be via the A413 which is not a designated route	The movement of staff and materials would be controlled by the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Measures detailing the control and monitoring are provided as part of this plan. Staff movements would be controlled and secured by the Staff Travel Plan contained within the **Outline Construction Traffic Management Plan [EN010158/APP/7.5].** This would control the access routes and mode of transport to and from site.	N
Suitability of road network	East Claydon Parish Council	Comment that the local roads are not suitable for HGV traffic.	The Applicant respectfully disagrees with this comment. Following the implementation of mitigation measures (detailed in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**), the local road network is considered suitable for HGV traffic.	N
Swept path analysis	Buckinghamshire Council	Comment that swept path analysis has not been provided for roads between the A41 and the Order Limits which means need for mitigation on these routes cannot be determined.	Swept path drawings at key locations where constraints are noted have been included in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**.	N

Traffic management	East Claydon Parish Council	Comment that there is little confidence in the intention to prevent construction traffic from travelling through villages.	Staff movements would be controlled and secured by the Staff Travel Plan contained within the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**, which sets out measures to mitigate disruption throughout the construction period. Adherence to management plans would be a requirement of the DCO if granted. The agreed access routes avoid traffic passing through the villages to the north of the A41 corridor. This is secured and controlled via the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**.	N
Traffic Management Group	Buckinghamshire Council	Comment that the formation of the Traffic Management Group should be a requirement of the DCO.	The formation of the Traffic Management Group is included within the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. Adherence to management plans would be a requirement of the DCO if granted.	N
Traffic surveys	Buckinghamshire Council	Comment that traffic surveys are representative of normal traffic flows but impacts of HS2 and EWR on the road network should be considered within the baseline. Note that construction impacts from EWR are set to reduce pre-	Both HS2 and EWR traffic has been captured in the baseline data used in the assessment presented in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**.	N

		construction of the Proposed Development.		
Trip generation	Buckinghamshire Council	Comments about trip generation rates, including that the Transport Assessment should set out the total number of person trips and then demonstrate how these will be reduced through travel plan measures, how minibus trips will be managed, and evidence how the north/south split has been determined. Other comments state the management strategy should be outlined in the Transport Assessment and detailed in the Travel Plan.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** provides details of projected traffic generation and trip distribution, while the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** provides details of how movement would be manged, including a Staff Travel Plan, and would be secured via the DCO.	N
Trip generation – Snake Lane/ Claydon Road	East Claydon Parish Council	Comment that the anticipated increase of return trips along Snake Lane and Claydon Road per day is unacceptable due to the narrow nature of these roads.	Following the implementation of mitigation measures (detailed in the **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**), the local road network is considered suitable for HGV traffic, including two-way traffic. No significant effects post mitigation are anticipated as noted in **Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**.	N

Wear and tear	East Claydon Parish Council	Request for reassurance that no significant road deterioration would occur given substandard nature of the roads.	The **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** sets out the Applicant's proposed approach to the Wear and Tear Agreement, which would be a legal agreement with the host authority. This would cover potential damage to the public road network within the proposed construction route, verges and structures as a result of the Proposed Development. It would be based upon condition surveys of the road. Any immediate necessary repairs would be coordinated within the host authority. Any damage caused by traffic associated with the Proposed Development that would be hazardous to public traffic would be repaired immediately.	N
Wear and tear	Buckinghamshire Council	Comment that the host authority expects to enter into a legal Wear and Tear Agreement.	The **Outline Construction Traffic Management Plan [EN010158/APP/7.5]** sets out the Applicant's proposed approach to the Wear and Tear Agreement, which would be a legal agreement with the host authority. This would cover potential damage to the public road network within the proposed construction route, verges and structures as a result of the Proposed Development. It would be based upon condition surveys of the road.	N

			Any immediate necessary repairs would be coordinated within the host authority. Any damage caused by traffic associated with the Proposed Development that would be hazardous to public traffic would be repaired immediately.	
Winter travel	Buckinghamshire Council	Comment that the Transport Assessment to demonstrate how traffic would be managed during winter as there would likely be limited gritting once traffic leaves the A41.	The roads proposed are public roads and gritting and winter maintenance is the sole responsibility of Buckinghamshire Council as the local roads authority.	N
Waste				
Approach to assessment	Buckinghamshire Council	Comment that there is no study area, methodology, or baseline information defined for material assets and waste, or indication of the preliminary impacts of the Scheme on material assets, and only an implied indication for waste.	**ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4]** sets out the potential streams and volumes of waste. The embodied lifecycle emissions of the materials proposed to be used for the Proposed Development are accounted for within the GHG emission assessment detailed in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2].** The **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2],** sets out how materials and waste would be	N

managed throughout the lifespan of the Proposed Development.

The Applicant does not consider it possible to assess decommissioning waste at this present time due to the uncertainty of future waste management measures and facilities. Therefore, an assessment of waste at decommissioning has not been undertaken. It is anticipated that further consideration of the potential waste at decommissioning would be a matter for the relevant consenting authority at the time and would be incorporated into the Decommissioning Environmental Management Plan (an outline version of this plan has been provided as part of the Application, see **Outline DEMP [EN010158/APP/7.4]**).

Operational (including maintenance) waste would be managed in line with the measures set out in the **Outline Site Waste Management Plan** which forms an Appendix to the **Outline CEMP [EN010158/APP/7.2]** and would be developed as part of the **Operational Environmental Management Plan** (see **Outline OEMP [EN010158/APP/7.3]**).

			During the operation (including maintenance) and decommissioning phases, the Applicant would engage with the relevant local authority to provide the anticipated quantities of waste for re-use, recycling and landfill, adopting the waste hierarchy and timings on when this waste would be produced as early as possible before each stage of the Proposed Development, once this is known to understand the capacities of recycling facilities in the region. With the mitigation detailed in and secured by the **Outline DEMP [EN010158/APP/7.4],** it is anticipated that the majority of waste would be diverted from landfill with no adverse effects on landfill capacity.	
Contaminated materials	Environment Agency	Comment that the Applicant should ensure that all contaminated materials are adequately characterised both chemically and physically and permitting status is clear for any proposed on-site operations, as well as in line with relevant waste management legislation.	Contaminated waste would be managed with in line with the relevant waste management legislation as set out **Outline Site Waste Management Plan** provided in **Appendix 1** of the **Outline Construction Environment Management Plan [EN010158/APP/7.2]**.	N
Excavated materials	Environment Agency	Comment that excavated materials that are recovered via a treatment operation can be re-used onsite under the CL:AIRE	This has been noted. Excavated waste would be managed with in line with the relevant waste management legislation as set out **Outline Site Waste Management**	N

		Definition of Waste: Development Industry Code of Practice.	**Plan** provided in **Appendix 1** of the **Outline Construction Environment Management Plan [EN010158/APP/7.2].**	
SWMPs	Buckinghamshire Council	Comment on SWMPs, including that these are considered best practice and should be produced. Comment that a SWMP should record duty of care information for the facilities managing waste.	The Applicant has submitted an **Outline Site Waste Management Plan (Appendix 1** of the **Outline Construction Environment Management Plan [EN010158/APP/7.2]**) as part of the DCO Application which secures the measure to record duty of care information for facilities managing waste and to track waste transfer notes. The detailed SWMP produced post-consent would include further details on duty of care information once this detail is known.	N
Waste	Environment Agency	Comments that the Applicant should comply with relevant legislation, guidance and permitting requirements in the use, disposal, classification and management of waste on-site. Comment that the Applicant should use a management and reporting system to ensure that waste is minimised and only goes to legitimate decisions.	The Applicant has produced an **Outline Site Waste Management Plan (Appendix 1** of the **Outline Construction Environment Management Plan [EN010158/APP/7.2]**) which demonstrates how the Applicant's approach to site waste would comply with all relevant legal and contract requirements for waste management. Management systems would be put in place alongside reporting on waste carriers and facilities as set out and secured in the **Outline Site Waste Management Plan (Appendix 1** of the	N

			Outline Construction Environment Management Plan [EN010158/APP/7.2]).	
Waste hierarchy	Buckinghamshire Council Environment Agency	Comments that the waste hierarchy should be followed.	The Applicant agrees with this comment. The **Outline Site Waste Management Plan** provided in **Appendix 1** of the **Outline Construction Environment Management Plan [EN010158/APP/7.2]** sets out how the Applicant would adhere to the waste hierarchy.	N
Water				
Approach to assessment	East Claydon Parish Council	Comment that the Applicant's approach to the issue of hydrology and flood-risk is superficial and cavalier. Specific reference made to lack of assessment of Flood Zone 2 which the Applicant states is likely to have risk of high flood depths.	The Applicant respectfully disagrees with this comment. Hydrology and flood risk impacts have been robustly assessed in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**) and **Outline Drainage Strategy [EN010158/APP/7.11].** The Flood Risk Assessment considers the flood risk from all sources with the appropriate Flood Zone (including Flood Zones 2 and 3).	N
Baseline	Buckinghamshire Council East Claydon Parish Council	Comments on the baseline data underpinning assessment on water resources, including that: • the baseline could be enhanced by additional surveys, ground	The baseline data is considered comprehensive and robust, referring to the appropriate data sources. The Applicant has also made use of modelling of Claydon Brook presented in the Flood Risk Assessment for the East Claydon BESS	

Environment Agency	investigations and hydraulic modelling to define the design water levels/ • the flood zone maps should not be relied on as definitive and on-site surveys are essential • that impacts of climate change (e.g. increased rainfall) on future flood extent has not been considered. • Fluvial flood risk for the catchment(s) should be assessed within the study area which have a surface area less than 3km2. • Proposed fencing should be assessed to ensure flood flow routes are not inhibited. • That the operational lifetime is not certain and the period of assessment should cover construction and decommissioning. • detailed modelling for key watercourses like Muxwell Brook and Claydon Brook should be undertaken • Fields SA51-57 have not been surveyed. • WFD waterbodies Technwick Brook, Source to Ray and tribs Water Body,	(23/93875/APP) to inform its baseline data. This modelling includes much of the Order Limits and is therefore appropriate to be used as part of the evidence base for the Proposed Development, with respect to the related flood risk constraints, specifically the extent of the various flood events. With the exception of BNG enhancements the Proposed Development does not encroach into the Muxwell Brook catchment. The operational (including maintenance) lifetime of the Proposed Development is 40 years. It is therefore considered that assessing against the 1 in 100 year (Flood Zone 3) and 1 in 1000 year (Flood Zone 2) fluvial flood extents and the 1 in 30 year (3.3% AEP 'high' risk pluvial), 1 in 100 year (3.3% - 1% AEP 'medium' risk pluvial) and 0.1% - 1% 'low' risk pluvial flood risk areas is sufficient. Climate change effects during the operational (including maintenance) phase have been considered in the **Outline Drainage Strategy [EN010158/APP/7.11].** Where feasible, a Sequential Approach to development has been adopted, ensuring that infrastructure is not located in areas that are prone to flooding. This includes

		and Padbury Brook (The Twins) should be assessed.	fencing, which has been designed as to not inhibit flood flows. All fields within the Order Limits have been addressed within **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** and **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]** A Water Framework Directive (WFD) Stage 1 Screening Assessment has been undertaken and agreed with the Environment Agency as included in **ES Volume 4 [EN010158/APP/6.4]**: **Appendix 16.2: Water Framework Directive (WFD) Waterbodies Stage 1 Screening Assessment**	
Battery storage	Environment Agency	Comment that the proposed location of the BESS (D8/9) is located in area shown to be at risk of flooding despite being outside of Flood Zone 2 and this should be designed appropriately to be resilient from flooding.	Effects during the operational (including maintenance) phase have been considered in the **Outline Drainage Strategy [EN010158/APP/7.11].** The BESS proposed in Fields D8 and D9 has been designed with consideration to flood risk from all potential sources. The principal flood risk to these parcels is considered to be pluvial flood risk. Within these parcels, there is sufficient area available to limit the BESS development to the areas of low pluvial flood risk, as these	N

			are confined to the areas close to the southern and northern field boundaries, respectively.	
Baseline	East Claydon Parish Council	Comment that the potential for surface water flooding identified does not fully represent the full extent of flooding experienced.	Surface water flood data has been obtained from the latest Environment Agency dataset (released January 2025), which has informed the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**). This dataset represents the most recent surface water flooding on a strategic level using the latest ground models and rainfall data. Should local datasets of historic flood data be available, these should be issued to the application for further consideration.	
Cabling	Environment Agency	Request that the Applicant defines and justifies a vertical displacement below bed level to prevent exposure of cabling from erosion, accounting for flood risks and future adaptation e.g., the installation of sheet pile flood defences.	There are no cable crossing proposed over any main watercourses. Where cables and other assets are proposed beneath ditches, an appropriate depth beneath the bed level would be used to ensure that the asset is not at risk from erosion for its design life.	N
Cabling	Environment Agency	Comment that cable integrity will need to be considered in the design. Comment advising against above ground siting of cables in areas of flood risk.	Cabling would be laid underground except where the solar PV modules are located in flood risk areas. In these instances, cabling would be contained within suspended ducts or fixed cable trays which would be	N

			fixed no higher than bottom edge of solar PV modules, mounted under the Solar PV modules and be fixed to the mounting structures.	
Crossing of watercourses	Environment Agency	Comment opposing the culverting of watercourses, with the preference of installation of a temporary clear-span bridge crossing. Specific reference made in relation to ecology impacts. Comment that a Crossing Register should be provided.	All watercourse crossings would be either clear span bridges or a culvert of appropriate size to convey flood flows. There would be no detrimental impact on ecology. Any temporary structures would be removed with the watercourse reinstated. A crossing register would be provided as secured in the **Outline CEMP [EN010158/APP/7.2].**	N
Crossing of watercourses	Environment Agency	Comment that the Applicant should consider trenchless methods for the crossing of watercourses for the cable routing or demonstrate how flood risk would not be increased with the open-cut method during the design flood.	There are no cable crossing proposed over any main watercourses. The installation of cabling would be undertaken in line with the measures set out in the **Outline CEMP [EN010158/APP/7.2].**	N
Decommissioning	Environment Agency	Comment that there should be consideration of the removal of all elements, including below ground infrastructure (e.g., cables and ducts) to prevent these becoming exposed at watercourses.	During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks would be removed to a depth of up to 1m. All the below-ground cables below 1m would be left in situ, however, this would be dependent upon the legislation and industry standards at the time of	N

			decommissioning as secured in the **Outline DEMP [EN010158/APP/7.4].**	
Design	East Claydon Parish Council	Request for clarity about how flood risk considerations have influenced the design of the Proposed Development e.g. the height of the solar panels, locations of elements of the Proposed Development.	Flood risk has been considered as part of the design of the Proposed Development. For example, where solar panels are proposed to be located in areas at a higher risk of flooding, these would be up to 4.5m in height. This would ensure that the electrical components are above the flood level (see **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**). Large electrical infrastructure such as the BESS, Rosefield Substation, Collector compounds etc. would be located outside the flood risk zones 3 and 2 as referenced in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4].**	N
Design	Environment Agency	Comment that development should be built away from areas prone to flooding, and if this is not possible sensitive equipment should have a finished floor level 600mm above the design flood. Solar panels should be designed so that they are above the 1% AEP water level with an allowance of higher central climate change. Specific reference made	This is noted. A Sequential Approach to development has been adopted, ensuring that infrastructure is not located in areas that are prone to flooding. This includes the commitment for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds to be	N

		to substation, battery storage and collector compounds.	located outside of Flood Zone 2 and 3 areas as secured in the **Design Commitments [EN010158/APP/5.9].** Further detail on the sequential test is set out in **Appendix 5 - Sequential and Exception Tests** of the **Planning Statement [EN010158/APP/5.7]**. An appropriate freeboard above calculated climate change flood levels has been assessed as part of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4].** This includes the commitment for the height of the lower part of the solar PV panels to be no greater than 1.8m AGL (post-earthworks) within Flood Zones as set out on the **Works Plans [EN010158/APP/2.3]** and secured in the **Design Commitments [EN010158/APP/5.9].**	
Permitting	Environment Agency	Comment that the Applicant should investigate whether it would require a permit/license as part of its proposals, including abstraction license (dewatering), groundwater activity permit (drilling muds for directional drilling), flood risk activity permit, impound license (impound a watercourse), a trade effluent	This has been noted, and the Applicant has engaged with the EA in relation to likely permits required and disapplication of permits / consents. As set out in the Schedule of Other Consents and Licences which supports the **Draft DCO [EN010158/APP/3.1],** the Applicant has noted that the likely consents are licences to be required (related to the EA) include,	N

		connection or agreement (discharging effluent to groundwater or surface water) dewatering may be needed so it can engage on appropriate licensing.	water abstraction or impoundment licence and water discharge. The Applicant has also engaged with the EA in relation to the disapplication of Flood Risk Activity Permits as the Order Limits is not located within close proximity to a main river / watercourse and therefore this is not considered to be required.	
Effects	East Claydon Parish Council	Comment disagreeing that the impacts on the water environment would be not significant. Specific comments state that development of Fields E10-11 & E20-23 is inappropriate due to flood risk.	As per the **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and in line with para 5.8.29 of the NPS (EN1) only Solar PV modules would be placed within the areas of fluvial flood risk (Flood Zones 2 and 3).Whilst the other infrastructure are located in the same field where there may be an area of flood risk, any ground works and construction for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds would be sited outside of Flood Zone 2 and 3. In line with para 5.8.7 of the NPS (EN1) the Solar PV modules have been designed to remain operational by raising the panels above the flood levels with the more vulnerable equipment located outside of the areas of flood risk as such the impacts on the	N

			existing flood regime is not significant as discussed in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4].** The commitment for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds to be located outside of Flood Zone 2 and 3 areas is secured in the **Design Commitments [EN010158/APP/5.9].**	
Effects	East Claydon Parish Council	Comment that the mitigation measures focus on negative impacts on the Proposed Development rather than other areas and adjoining agricultural activities e.g. field drain damage, increase in impermeable surfaces.	Any increase in impermeable area could result in increased surface water runoff. This has been considered in the **Outline Drainage Strategy [EN010158/APP/7.11]** where the surface water generated from the development is managed on site through the use of SuDS features. The proposed mitigation measures are designed to ensure the Proposed Development remains operational during times of extreme flooding, whist ensuring that flood risk off site is not increased with no impact on flood water storage or flood flow conveyance.	N

			Any land drainage systems damaged as part of the development (through piling or other construction methods) would either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. This is secured in the **Outline Construction Environment Management Plan [EN010158/APP/7.2].** The panels would allow existing overland flow pathways to be maintained with no disruption to flows.	
Effluent	Environment Agency	Comment that the strategy for managing effluent needs clarification.	When carrying out maintenance 'panel washing' would take place using de-ionized water. This is discharged to ground via the current surface water discharge routes. Foul water from welfare facilities is being managed as outlined in the **Outline Drainage Strategy [EN010158/APP/7.11]** and **ES Volume 1 Chapter 3 Proposed Development Description, section 3.14.24 -3.14.25 [EN010158/APP/6.1].** Any permits required for the chosen solution would be discussed with the Environment Agency.	N
Engagement	Buckinghamshire Council	Comment that the North Bucks Freshwater Resilience Project should be consulted.	The North Buckinghamshire Freshwater Resilience Project has been consulted as referenced in the **ES Volume 4, Appendix**	N

			16.1: Flood Risk Assessment [EN010158/APP/6.4].	
Field drains	East Claydon Parish Council	Comment expressing concern that field drains would be destroyed during the construction phase which would increase flood risk.	There are likely to be land drains within the Site boundary which assist with the drainage of arable land in this area. A risk assessment would be carried out prior to construction works commencing to identify land drains within the Order Limits. This assessment would record the location, condition and characteristics (e.g. depth of installation, pipe type and diameter) of drains cut or disturbed by construction of the Proposed Development. Should any land drains be damaged during the construction phase any resultant flood risk would be very localised with land drainage reverting to more natural conditions, albeit a change from the current baseline. Land drainage systems which are damaged would either be reinstated or diverted to ensure no lasting impacts from the baseline. This is secured in the **Outline CEMP [EN010158/APP/7.2].**	N
Firewater	Environment Agency	Comment that firewater and drainage for the BESS design has not been considered and should be included in the oBSMP. More information about the	As set out in the **Outline Drainage Strategy [EN010158/APP/7.11]**), an example approach to drainage could include a separate system around the	N

		containerisation/ bunding proposed required.	BESS to containerise/collect water runoff into an attenuation/storage pond. This would have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal. This trapped water could then be reused as a potential source of firefighting water. This follows the management plan process as detailed in "Protocol for the disposal of contaminated water and associated wastes at incidents 2018" jointly issued by the Environment Agency, Northern Ireland Environment Agency, Water UK and Chief Fire Officers Association. Further detail on the firewater and drainage design, including the proposed for the containerisation of firewater is set out and secured within the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **Outline Drainage Strategy [EN010158/APP/7.11]** which have been submitted as part of the DCO Application.	
Flood risk	East Claydon Parish Council Steeple Claydon Parish Council	Comments that the flood risk in the area is underestimated by the Applicant. Specific reference that East Claydon Substation is prone to flooding risk, and	Flood risk data has been obtained from the latest Environment Agency NaFRA dataset issued in March 2025. As detailed in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, additional hydraulic modelling has been	N

	Calvert Green Parish Council	potential impacts during construction more generally.	undertaken to fully assess the flood risk associated with Claydon Brook and the potential impact on the BESS and Rosefield Substation. A Sequential Approach to development has been adopted, ensuring that infrastructure is not located in areas that are prone to flooding. This includes the commitment for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds to be located outside of Flood Zone 2 and 3 areas as secured in the **Design Commitments [EN010158/APP/5.9].** There are no cumulative flood risk impacts anticipated with the National Grid East Claydon Substation. Further detail on the sequential test is set out in **Appendix 5 - Sequential and Exception Tests** of the **Planning Statement [EN010158/APP/5.7]**.	
Flood risk	East Claydon Parish Council	Comment that a flood risk assessment should be provided at PEIR to allow the determination of the site suitability and design.	A Flood Risk Assessment has been undertaken and is included as **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**.	N

Flood risk	East Claydon Parish Council Environment Agency	Comments on assessment of flood risk, including: • Disagreement that the majority of the Order Limits is classed as low risk. • Query why the Proposed Development is proceeding in light of the identified flood risk. Specific reference to flooding in the north of Parcel 3. • Assessment should be made of the loss of floodplain storage volume from structures proposed within the design flood extent throughout the lifetime of the development.	An appropriate assessment has been undertaken with respect to all identified forms of flood risk in the **Flood Risk Assessment [EN010158/APP/6.4]**. A Sequential Approach to development has been adopted, ensuring that infrastructure is not located in areas that are prone to flooding, which includes Flood Zone 2 and 3. This includes the commitment for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds to be located outside of Flood Zone 2 and 3 areas as secured in the **Design Commitments [EN010158/APP/5.9].** The design also includes the commitment for the height of the lower part of the solar PV panels to be no greater than 1.8m AGL (post-earthworks) within Flood Zones as set out on the **Works Plans [EN010158/APP/2.3]** and secured in the **Design Commitments [EN010158/APP/5.9].** The impact of the Solar PV Modules and fence posts that would be present in Flood Zone 2 and 3 is minimal and is determined	N

			to be a negligible loss to floodplain storage volumes.	
Flood storage compensation	Environment Agency	Comment that appropriate flood storage compensation is required for all proposed structures within the 1 in 100 years plus climate change flood extent.	Whilst some Solar PV panels are to be located in areas of flood risk (1 in 100 years plus climate change flood extent), there is to be no ground level modification reducing the floodplain storage volume and as such there is no requirement for compensatory storage to be provided. The Solar PV panels would be supported by framework which would occupy a negligible volume of floodplain storage. This would allow the existing flow routes to be maintained and therefore there would be no impact on existing flood risk in the area. All other infrastructure is located outside of the 1 in 100 year plus climate change flood extent. All relevant detail is included in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**,	N
Foundations	Environment Agency	Comment that the impact of foundations (panels, BESS, substation) on groundwater flow and quality is not mentioned in the assessment. Consideration of any risk mitigation should be identified through the land contamination assessment e.g. different	Likely impacts on groundwater flow and quality due to the construction activities are assessed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Section 11.10.4). Foundations for the buildings may also affect groundwater flow. A	N

	foundation options, especially in soils designated as Secondary A Aquifer.	specific assessment can only be made once groundwater data has been obtained as part of intrusive site investigation works. Concrete design would take into account existing ground conditions and groundwater conditions, to ensure that appropriate types of concrete are used to minimise impacts on structural integrity due to the chemistry of the groundwater. Consideration of potential impacts from below-ground materials (e.g. concrete) are made as part of best practice construction measures, and this issue would be addressed as part of geo-technical design works (defining the appropriate concrete class for the ground and groundwater conditions). With respect to the risks to areas of the Order Limits that are designated as a Secondary A aquifer, an assessment is provided within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**, and the assessment concludes that there would not be any significant effects on groundwater receptors after mitigation has been applied (for construction, operation (including maintenance) or decommissioning phases). Mitigation measures relating to

			the protection of groundwater are secured by the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4].**	
Groundwater	Buckinghamshire Council	Request for more information about how contaminated runoff would be contained, collected and tankered off-site in the event of an emergency.	More information about how contaminated runoff would be contained, collected and tankered off-site in the event of an emergency is provided in the **Outline BSMP [EN010158/APP/7.9]**, which is supported by the **Outline Drainage Strategy [EN010158/APP/7.11]**.	N
Guidance	Environment Agency	Comment that the Applicant should have regard to the EA's approach to groundwater protection.	The Applicant has had regard to the Environment Agency's approach to groundwater protection. Appropriate measures are set out and secured in the **Outline CEMP [EN010158/APP/7.2]**.	N
Mitigation	Environment Agency	Request for measures to mitigate potential risks of increased runoff during construction to be included in the oCEMP.	The **Outline CEMP [EN010158/APP/7.2]** includes measures to mitigate the risk of increased runoff during construction such as attenuation ponds, swales and appropriate pollution control measures.	N
oCEMP	Environment Agency	Comment that detail about the oCEMP is limited and confirmation is required. Specific reference made to groundwater protection during construction.	Groundwater mitigation is detailed within the **Outline CEMP [EN010158/APP/7.2].**	N

Offsets	Buckinghamshire Council Environment Agency	Comment that the proposed minimum offsets from watercourses (10m from Main Rivers and 6m from Ordinary Watercourses) are considered unacceptable. Other comments state that there should be a minimum offset of 8m for all watercourses for maintenance.	Perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all existing ditches and ordinary watercourses except where access tracks and/or cable routes are required to cross an existing feature. This is in line with the guidance from the Internal Drainage Board and is secured in the **Design Commitments [EN010158/APP/5.9]**.	N
Optionality	Environment Agency	Comment that the lack of certainty around the location of key infrastructure prevents understanding of whether a worst-case scenario has been identified and therefore clarity on the proposed design should be provided in the ES. Comment that the placement of temporary compounds, laydown areas and spoil are undefined.	**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out those elements of the Proposed Development for which optionality is present within the design. It should be noted that the proposed locations of the Rosefield Substation and BESS were narrowed down following Phase Two Consultation. Assumptions presented within the Preliminary Environmental Impact Report accounted for a reasonable worst case at the time of writing. A similar approach has been undertaken in the Environmental Statement to ensure the reasonable worst-case optionality has been assessed. Placement of key infrastructure has been considered using a sequential approach to	N

			development, siting the more vulnerable elements of the development in the areas of lower flood risk. This is fully referenced in **Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**), with the reasonable worst-case scenario assessed in the **Environmental Statement [EN010158/APP/6.1 to 6.4]**. Where feasible, temporary compounds and spoil would be sited within Flood Zone 1.	
Permitting	Environment Agency	Comment that the Applicant should consider whether environmental permits are required (as well as any disapplication of permits and consents) and engage with the EA at an early stage to avoid delays. Requirement for a consent strategy document within the DCO Application.	This has been noted. The Applicant has engaged with the EA in relation to likely permits required and disapplication of permits / consents. As set out in the Schedule of Other Consents and Licences which supports the **Draft DCO [EN010158/APP/3.1],** the Applicant has noted that the likely consents are licences to be required (related to the EA) include, water abstraction or impoundment licence and water discharge. The Applicant has also engaged with the EA in relation to the disapplication of Flood Risk Activity Permits as the Order Limits is not located within close proximity to a main river / watercourse and therefore this is not considered to be required.	N

Pollution	Environment Agency	Comment that the statement that as waterbodies have an overall status of moderate and therefore sources of pollution have not significantly impacted water quality is incorrect and risk underestimating potential significant of water quality impacts.	It is considered likely that the development would decrease pollution from agricultural practices. Notwithstanding this, an appropriate Water Framework Directive Screening Assessment has been undertaken and all potential sources of pollution considered. This document has been agreed with the EA and is available in **ES Volume 4, Appendix 16.2: Water Framework Directive (WFD) Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4]**.	N
SuDS	Environment Agency	Comment that it is expected that SuDS would be provided in new developments, supported by a hydrogeological risk assessment.	This is addressed and secured in the **Outline Drainage Strategy [EN010158/APP/7.11]** where the surface water generated from the development is managed on site through the use of SuDS features.	N
SuDS	Buckinghamshire Council	Comment that SuDS features should be integrated within ecological buffer strips along watercourses to ensure runoff is captured and treated before entering watercourses.	This has been noted and has been considered and incorporated into the design of the Proposed Development to ensure an alignment of the ecological enhancements and SuDS features. These are detailed and secured in the **Outline Drainage Strategy [EN010158/APP/7.11].**	N
Surface water	Buckinghamshire Council	Comment that mitigation measures are not provided for the risk of increased silt-	Detailed mitigation measures, such as baffles, silt fencing and sediment socks	N

		laden runoff during construction and commissioning stages.	has been provided within the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]**.	
Surface water	Buckinghamshire Council	Comment that the PEIR does not account for site-specific conditions for surface water management.	The **Outline Drainage Strategy [EN010158/APP/7.11]** outlines the proposals for drainage of the Proposed Development with existing geological conditions being a factor in the design.	N
Surface water	East Claydon Parish Council	Comment that the nature of run-off from solar panels is such that it is directed along linear paths with the potential to cause surface erosion and does not replicate field run-off.	The rainfall runoff from solar panels would be to the ground within the 'rainwater gap' between panels. Any risk of channelisation if solar panels are arranged perpendicular to the contours of the site would be manged through appropriate vegetation management, usually comprising vegetated strips around the periphery of the solar panels.	N
Surface water	Anglian Water Services	Comment that surface water run-off from above ground permanent buildings and impermeable surfacing should be managed by SuDS with any outfall to a watercourse, in accordance with the drainage disposal hierarchy.	Any increase in impermeable area could result in increased surface water runoff. This has been considered in the **Outline Drainage Strategy [EN010158/APP/7.11]** with discharge from the Proposed Development in line with the drainage disposal hierarchy.	N
Surface water	Environment Agency	Comment that assessment and mitigation of an increase in the rate of runoff from all	The **Outline Drainage Strategy [EN010158/APP/7.11]** outlines the	N

		proposed impermeable surfaces for all phases of the development should be provided.	methodology regarding the calculation of the various greenfield runoff rates, as agreed in consultation with the Lead Local Flood Authority and Internal Drainage Board.	
Trenchless technology	Environment Agency	Request for more information about any trenchless technologies e.g. HDD that may be required to identify any risks and mitigation measures.	Further detail has been provided in **ES Volume 2, Chapter 3: Proposed Development Description [EN010158/APP/6.2]**, with relevant mitigation measures included within the **Outline CEMP [EN010158/APP/7.2].**	N
Water abstraction	East Claydon Parish Council	Comments about the implications of water abstraction from local watercourses, including potential contamination on habitats and livestock drinking water.	Abstraction from local watercourses is not proposed. Run-off management to prevent pollution of watercourses has been set out in the **Outline CEMP [EN010158/APP/7.2]**.	N
Water demand	Environment Agency	Comment that a WRA should be developed which sets out all water demands of the Proposed Development and considers potential sources of supply.	Should a water connection and wastewater connection be sought as part of the Proposed Development then a Water Resource Assessment would be compiled and submitted to Anglian Water. Stakeholder engagement discussions have taken place and are ongoing with Anglian Water considering estimated water supply and disposal volumes to check the capacity of the system should connections be sought.	

Water quality	Environment Agency	Comment that potential impacts on water quality during operation have not been identified (e.g. routine runoff, firewater) which prevents identification of appropriate mitigation.	It is considered likely that the Proposed Development would decrease pollution from agricultural practices. The surface water drainage arrangements, including reference to water quality, are outlined in the **Outline Drainage Strategy [EN010158/APP/7.11]**	N
Water recycling	Anglian Water Services	Comment that the requirement for any water recycling connections should be clarified. Request confirmation that the draft DCO would have no powers to connect to the public sewer network.	The drainage arrangement for permanent welfare facilities is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11].** The site could require provision for domestic foul drainage. Due to rural nature of the site and low flows in operational phase, an initial approach to foul water drainage would be via package treatment works located at each welfare area. Actual foul flows are likely to be small (ca. 24 permanent staff on site), so a package of treatment works with discharge towards a local ditch/watercourse network (if required via drainage field) may be viable. Should the approach not be suitable due to onsite conditions the foul water would be stored in cesspits and these would be managed, inspected and drained through a licensed carrier who would dispose of the waste offsite. During the construction and decommissioning phases of the Proposed	N

			Development, this could be achieved through two possible disposal options: a potential connection to the local foul sewer network or, alternatively, the waste/foul water would be collected across the welfare areas of the site and stored in cesspits. These would then be managed, inspected and drained by a licensed carrier who would then dispose of the waste/foul water discharge offsite.	
Water requirements	Anglian Water Services	Comment that water resource requirements during construction and operations should be covered in detail and through a Water Resources Assessment to ensure that requirements can be met.	Should a water connection and wastewater connection be sought as part of the Proposed Development then a Water Resource Assessment will be compiled and submitted to Anglian Water. Stakeholder engagement discussions have taken place and are ongoing with Anglian Water considering estimated water supply and disposal volumes to check the capacity of the system should connections be sought.	N
Wheel washing	East Claydon Parish Council	Query the source of water for vehicle wheel-washing facilities and how it would be disposed of.	Abstraction from local watercourses is not proposed for the purposes of vehicle wheel-washing facilities and it is anticipated that water would be tankered to the Site. Run-off management to prevent	N

			pollution of watercourses is set out in the **Outline CEMP [EN010158/APP/7.2]**.	
Miscellaneous				
Heat production	East Claydon Parish Council	Comment that the BESS, Rosefield Substation and collector compounds would be major sources of heat production.	As agreed by the Planning Inspectorate (see **ES Volume 4, Appendix 5.2: Scoping Opinion [EN010158/APP/6.4]**) heat and radiation has been scoped out of assessment, on the basis that it is not anticipated that there would be any significant sources of heat or radiation during either construction, operation (including maintenance) or decommissioning.	N
Major accidents and disasters	East Claydon Parish Council	Request for the following to be considered in the assessment: • Risk of flooding of adjacent fields and roads • Risk of fire and water contamination • Expansion of plant disease to consider overall biosecurity and import of invasive species.	The Planning Inspectorate agreed that major accidents and disasters could be scoped out of the assessment, on the basis that by implementing recognised and approved safety legislation and regulation, no significant effects in relation to major accidents and disasters would be anticipated during the construction, operation (including maintenance) and decommissioning phases. However, the impacts of major accidents and disasters are considered within the **BESS Plume Assessment [EN010158/APP/7.13], ES Volume 4,**	N

			Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4], and **ES Volume 1, Chapter 16: Water [EN010158/APP/6.2],** with any relevant mitigation measures secured within the **Outline Construction Environmental Management Plan [EN010158/APP/7.2], Outline Operational Environmental Management Plan [EN010158/APP/7.3]** and **Outline Battery Safety Management Plan [EN010158/APP/7.9]** which are submitted in support of the DCO Application. Biosecurity measures are outlined and secured in the **Outline LEMP [EN010158/APP/7.6].**	
Mobile phone signal	East Claydon Parish Council	Query if the Proposed Development would impact on mobile phone signal.	There would be no impacts on mobile phone signal from the Proposed Development.	N
No comment	Ministry of Defence, NATS Safeguarding, euNetworks, Central Beds Council, Chiltern Conservation Board, Active Travel England, NHS	Comment that the respondent has no comments to make on the Proposed Development.	The Applicant thanks the respondent or reviewing the materials and responding to the consultation.	N

	Gloucestershire ICB, GTC, West Northamptonshire Council, Canal and River Trust, Coal Authority, SGN, Milton Keynes City Council			
Transboundary effects	East Claydon Parish Council	Query if the assessment of transboundary effects on the environment of another European Economic Association State has considered recycling of major elements at decommissioning.	The **EIA Scoping Report** (**ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4]**) submitted by the Applicant addressed any potential for transboundary effects and concludes that due to the nature and location of the Proposed Development there would not be a transboundary LSE. The Planning Inspectorate (on behalf of the Secretary of State) concluded that it is unlikely that the Proposed Development would have a significant effect either alone or cumulatively on the environment in a European Economic Area Member State and therefore a transboundary assessment has been scoped out of the EIA. Measures to manage recycling of waste during construction, operation (including maintenance) and decommissioning is	N

			detailed in the **Outline Site Waste Management Plan** (which forms an appendix to the **Outline CEMP [EN010158/APP/7.2]**)	
Utilities	East Claydon Parish Council	Query if requirement for utilities on site during construction and operation (e.g. electricity, water, foul water) would impact on services to the wider community.	Existing above and below-ground utilities across the Proposed Development are not intended to be altered. The offsets to these assets have been discussed with the relevant Statutory Undertakers as part of the design process and are accounted for within **Work No. 1**, as set out on the **Works Plans [EN010158/APP/2.3]**. If diversions are required, these would be carried out in accordance with the Protective Provisions between the Applicant and relevant Statutory Undertaker within the made DCO. Searches have been completed for all buried services and discussions are ongoing with statutory stakeholders to ensure that Statements of Common Ground and Protective Provisions are in place for the protection of the assets. This will help mitigate the risk of any inadvertent service strikes with associated health and safety impacts as well as wider community impacts.	N

	The **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** outlines additional mitigation measures to protect against interference with below ground utilities during construction.

Appendix J-2– Summary of Section 47 responses and consideration by topic

Appendix J-2: Summary of Section 47 responses and consideration by topic[1]

Table J-2: Summary of Section 47 responses and consideration by topic

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Air quality				
General comment – air quality	EM_35, EM_36, EM_52, EM_148, EM_96	Comment that there would be pollution during the construction period, including from construction traffic.	According to the Buckinghamshire Council 2024 Air Quality Annual Status Report, air quality is considered to be good in the local area. Any effects on air quality during construction of the Proposed Development would be temporary (i.e. during the construction period only). Therefore, it is unlikely there would be a risk of emissions that could result in an exceedance of the Air Quality Standards. Emissions during construction phase can be suitably controlled by the employment of mitigation measures documented within **ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4]** and would be secured by the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]** and **Outline Construction Traffic Management Plan [EN010158/APP/7.5]**. Examples of mitigation measures includes using suppression around sites of	N

[1] Abbreviations and defined terms are included within **ES Volume 1, Chapter 00: Glossary [EN010158/APP/6.1]**

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			specific operations, implementing a wheel washing system and imposing and signposting a speed limit on unsurfaced haul roads and work areas.	
Approach to EIA				
Adequacy	EM_09	Comment that environmental assessments have been inadequate.	The environmental assessments have been undertaken in accordance with applicable legislation and guidance which has been tailored to each environmental factor of the EIA using industry standard methods and criteria, and professional opinion where appropriate. Further detail on the assessment approach and methodology applied to each environmental factor assessment is presented within the respective environmental factor assessment chapters provided in **ES Volume 2, Chapters 6 - 16 [EN010158/APP/6.2]**.	N
Information	EM_47, EM_49, EM_79, EM_107, EM_122, EM_35, EM_42, EM_137, EM_141	Comment that more information is needed on the environmental impact of the Proposed Development.	The PEIR was an interim assessment to provide an update of the project and to gain feedback from stakeholders to further improve the Proposed Development. Following feedback gained during Phase Two Consultation, the design was refined as detailed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** and further environmental surveys and assessments have	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			been undertaken (see **ES Volume 2, Chapters 6-16 [EN010158/APP/6.2]**).	
Battery storage				
Efficiency	EM_86	Comment that BESS is not efficient.	Paragraph 2.10.10 within NPS EN-3 sets out that government is supportive of solar development that is "co-located with other functions (including storage) to maximise the efficiency of land use". The proposed BESS would primarily support the solar development by storing generated electricity and exporting it to the National Grid at times of demand. It is intrinsically linked to the principal development in that it provides support to increase operational efficiency in a way that the principal development cannot achieve on its own. To maximise the efficiency of the BESS at the detailed design stage, opportunities would be investigated to increase the lifetime generation output of the Proposed Development and the benefits arising from its development, within the envelope of development secured at consent.	N
Information	EM_92, EM_93, EM_106, EM_17, EM_18, EM_33,	Comment that more information is needed on	The Applicant has designed the BESS in line with industry best practice, ongoing dialogue with stakeholders such as the UK Health Security Agency	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_39, EM_47, EM_49, EM_78, EM_79, EM_86, EM_88, EM_98, EM_99, EM_105, EM_109, EM_130, EM_132, EM_143, EM_146, EM_149, EM_73, EM_74, EM_122, EM_141, EM_150, EM_14	battery safety and how it would be managed.	and Buckinghamshire Fire and Rescue Services and all applicable guidance. This includes, for example, the layout of assets to limit the ability for a thermal runaway event to spread to adjacent enclosures and nearby residential receptors, suitable preventative measures and response to any thermal runaway event. It has also investigated BESS safety – including fire risk – and adopted suitable mitigation measures and management within the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **BESS Plume Assessment [EN010158/APP/7.13]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in, such an event, this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is once every 344 years. The **BESS Plume Assessment [EN010158/APP/7.13]** has demonstrated that the risk to the population remains **very low**.	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Along with the **Outline Battery Safety Management Plan [EN010158/APP/7.9]**, the **Outline Surface Water Drainage Strategy** (appended to **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**) sets out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed design stage, the Applicant would prepare, in consultation with Buckinghamshire Fire Authority, an Emergency Response Plan to outline the strategy for how the Fire and Rescue Service would respond to any BESS event. This would be maintained and reviewed regularly throughout the operating life of the BESS. The plan would be developed in accordance with NFCC guidance and other guidance and good practice in place at the time. For more information about what the plan would cover please refer to **Outline Battery Safety Management Plan [EN010158/APP/7.9]**.	
Information	EM_44	Comment that there is a lack of information on the	The Applicant has set out information about the proposed BESS within **ES Volume 1, Chapter 3: Proposed Development Description**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		location of the BESS and its capacity.	**[EN010158/APP/6.3]**, which is shown on Sheet 6 of the **Works Plans [EN010158/APP/2.3].** Furthermore, the **Illustrative Layout Plan Sheet 6 of 8 [EN010158/APP/2.6]** shows an indicative layout of the BESS (subject to detailed design).	
Location	EM_145, EM_148	Comments that the BESS is proposed too close to villages and local residents.	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems". It has also investigated BESS safety – including fire risk – and adopted suitable mitigation measures within the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **BESS Plume Assessment [EN010158/APP/7.13]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in, such an event, this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). The **BESS Plume Assessment [EN010158/APP/7.13]** consequence analysis	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			modelling predicts the significant results based on the worst credible case of toxic gas release. The results show that these gases dispersed to concentrations lower than SLOT (Specified Level of Toxicity) levels at 67m for Carbon Monoxide (CO) and 72m for Hydrogen Fluoride both at distances significantly lower than the nearest residential dwelling (400m). The closest occupied dwelling (Borshaw Farm) is not predicted to experience harmful conditions. The distances represent thresholds from the CIA Occupied Building Risk Assessment guidance and indicate that the risks to offsite personnel are below the risk threshold.	
Pollution	EM_47, EM_101, EM_102, EM_117, EM_110, EM_31, EM_44, EM_46, EM_71, EM_76, EM_150, EM_155, EM_89, EM_90	Comment that there is a pollution risk from the BESS.	The **BESS Plume Assessment [EN010158/APP/7.13]** consequence analysis modelling predicts the significant results based on the worst credible case of toxic gas release. The results show that these gases dispersed to concentrations lower than SLOT (Specified Level of Toxicity) levels at 67m for Carbon Monoxide (CO) and 72m for Hydrogen Fluoride both at distances significantly lower than the nearest residential dwelling (400m). The closest occupied dwelling (Borshaw Farm) is not predicted to experience harmful conditions. The distances represent thresholds from the CIA Occupied Building Risk Assessment guidance and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			indicate that the risks to offsite personnel are below the risk threshold. Although not necessary in order to provide sufficient information with the Application, the Applicant has decided to undertake a further atmospheric dispersion model to predict the Parts Per Million values at Sensitive Receptors and look at particulate matter PM2.5 and PM10 values at Receptors. This information will be made available to the Examining Authority once the study is complete, and the report has been finalised. The results from the additional modelling should further support the original plume modelling that has been carried out to check the levels of the contaminants around the BESS site during an unlikely thermal runaway event.	
Safety	EM_101, EM_102, EM_134, EM_129, EM_117, EM_107, EM_110, EM_116, EM_122, EM_30, EM_31, EM_35, EM_36, EM_41, EM_44, EM_46, EM_50, EM_56, EM_71, EM_76,	Comments expressing concerns about battery safety, including concerns that local infrastructure is not equipped to respond to a BESS fire.	The Applicant has designed the BESS in line with industry best practice, ongoing dialogue with stakeholders such as the UK Health Security Agency and Buckinghamshire Fire and Rescue Services and all applicable guidance. This includes, for example, the layout of assets to limit the ability for a thermal runaway event to spread to adjacent enclosures and nearby residential receptors, suitable preventative measures and response to any thermal runaway event.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_77, EM_81, EM_137, EM_140, EM_141, EM_144, EM_147, EM_148, EM_155, EM_90, EM_94, EM_95, EM_96, EM_100, EM_87, EM_18, EM_33, EM_118, EM_14		It has also investigated BESS safety – including fire risk – and adopted suitable mitigation measures and management within the **Outline Battery Safety Management Plan [EN010158/APP/7.9]** and **BESS Plume Assessment [EN010158/APP/7.13]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in, such an event, this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is once every 344 years. The **BESS Plume Assessment [EN010158/APP/7.13]** has demonstrated that the risk to the population remains **very low.** Along with the **Outline Battery Safety Management Plan [EN010158/APP/7.9]**, the **Outline Surface Water Drainage Strategy** (appended to **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**) sets out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed design stage, the Applicant would prepare, in consultation with Buckinghamshire Fire Authority, an Emergency Response Plan to outline the strategy for how the Fire and Rescue Service would respond to any BESS event. This would be maintained and reviewed regularly throughout the operating life of the BESS. The plan would be developed in accordance with NFCC guidance and other guidance and good practice in place at the time. For more information about what the plan would cover please refer to **Outline Battery Safety Management Plan [EN010158/APP/7.9].**	
Biodiversity				
Sheephouse Wood	EM_18	Comments that the encirclement of Sheephouse Wood would negatively impact the Bechstein Bat population.	The full detailed assessment of potential impacts on Bechstein's and other bat species is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].** Given the sensitivity of the location of the Proposed Development, particularly to commuting and foraging bats, the layout and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats such as field	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			margins, woodland, hedgerows, trees, ponds, watercourses, and ditches through appropriate buffers. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced. By creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. Survey work using paired static detectors outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** have confirmed the importance of hedgerows for foraging bats giving some confidence that the approach to mitigation is the correct one and would likely maintain habitat connectivity and minimise fragmentation for foraging bat species. Where key areas of bat activity, in particular *Myotis* (which includes Bechstein's bats) activity have been identified, specific measures have been embedded into the design of the Proposed Development. Solar PV modules have been removed from a number of	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			fields as part of an overall reduction in Solar PV module area, including removal from: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane. • Fields D27, adjacent to the eastern edge of Runt's Wood. • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI, known to support 12 Bechstein's bat maternity roosts Instead, these fields would be used to provide mitigation areas for bats (and ground nesting birds) including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere and Runt's Wood. Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from existing hedgerows located within Fields B3 and B7, between fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs Wood and Decoypond Wood. This would help to reduce potential displacement effects from Solar PV to foraging and commuting bats. Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity was recorded. Early planting/habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of fields D30, D29 and D28 and hedgerows along boundary of fields D30, D34 and D37) ahead of construction activities starting. This strategic planting to improve foraging	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			and commuting habitat for bats between woodland blocks; to improve connectivity across the Site and to the wider landscape; compensate for hedgerows lost; improve retained hedgerows; to improve foraging, roosting habitat for bats (see **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**).	
Woodland	EM_67	Comments that new woodland should be created. Specific reference made to the field east of Runts Wood and more planting to the north of Finemere Wood.	Habitat creation and enhancement measures are set out in the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6] Appendix 7.17**, which includes the creation of *c.*8.5 ha of new woodland planting across the Site. To strengthen the corridor between Finemere Wood and Runt's Wood new tree belts/woodland, new hedgerows and hedgerow reinforcement planting is proposed along the boundaries of Field D29 and partially in Field D28**.**	Y
Assessment	EM_92, EM_93, EM_106, EM_49, EM_72, EM_88, EM_99, EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149,	Comments that existing habitats have not been adequately assessed.	A full suite of UK habitat surveys and condition assessment surveys covering the entire Order Limits have been completed with the results of these surveys presented in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4**.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_73, EM_74, EM_147, EM_91			
BNG	EM_14	Comment that BNG must be carried out in liaison with BBOWT.	A detailed biodiversity design has been produced outlining how a net gain in biodiversity would be achieved using the latest version of the Statutory Biodiversity Metric. **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6].** On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units. The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and has been developed in consultation with Natural England, the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. These measures focus on compensating adverse effects on habitats and species already known, and to improve the Site for species that could feasibly colonise the Site in the future given the surrounding landscape.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Fencing	EM_67	Comment that fencing should be wildlife friendly.	Fencing would be around the inside of each solar field enabling large mammals such as deer to move across the landscape between field boundaries and security fencing within the buffers provided (see **ES Volume 3, Figure 3.12 - Typical Security Details [EN010158/APP/6.3]**). Mammal gates and clearance gaps under fences at low points would allow animals, such as badgers and brown hare, to fully access areas under Solar PV modules for foraging and to allow dispersal across the area.	N
General	EM_65, EM_101, EM_114, EM_116, EM_126, EM_23, EM_32, EM_41, EM_44, EM_48, EM_50, EM_52, EM_76, EM_77 EM_137, EM_144, EM_147, EM_152, EM_91, EM_94, EM_95, EM_96, EM_100, EM_87, EM_33, EM_72, EM_74, EM_104,	Comments expressing concern about the impact of the Proposed Development on wildlife. Specific comments referred to potential impact of construction on wildlife.	A full assessment of wildlife is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. It also details mitigation to ensure the protection of species and habitats which would be secured by the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3], Outline LEMP [EN010158/APP/7.6]** and **Outline DEMP [EN010158/APP/7.4]**.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_117, EM_118, EM_126, EM_06, EM_09, EM_148			
Habitat	EM_104, EM_108, EM_118, EM_119, EM_120, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_157, EM_23, EM_32, EM_44, EM_48, EM_52, EM_68, EM_76, EM_139, EM_140, EM_95	Comment that existing habitats would be lost.	The full assessment of biodiversity is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].** All woodland, wetlands, watercourses and the majority of hedgerows are being retained, with a comprehensive set of habitat creation and enhancement measures proposed which are set out in the **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4** sets out how the Proposed Development would achieve a biodiversity net gain above the existing baseline using the latest version of the Statutory Biodiversity Metric. This is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]**. On a precautionary basis, the Applicant is committing to a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units.	N
Climate				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Battery storage	EM_30, EM_140	Comments that the BESS has a large carbon footprint.	The full lifecycle assessment presented in **ES Volume 1, Chapter 8: Climate [EN010158/APP/6.2]** takes into account the emissions associated with the construction, operation and decommissioning of the BESS for the Proposed Development and displays those emissions in tCO_2e. The GHG savings of the Proposed Development would outweigh the emissions associated with its construction, operation (including maintenance and replacement), and decommissioning, resulting in net GHG savings of over 3 million tonnes of CO_2e.	N
General	EM_44, EM_31, EM_46, EM_71, EM_76, EM_95, EM_96, EM_100	Comments expressing concern about the carbon footprint of the Proposed Development. Specific comments raised use of shipping, manufacturing, use of rare minerals.	The full lifecycle assessment presented in **ES Volume 1, Chapter 8: Climate [EN010158/APP/6.2]** takes into account the embodied emissions and manufacturing of all key components of the Proposed Development, including transportation (including shipping),and displays those emissions in tCO_2e. Further information on the assumptions and sources used are presented in **ES Volume 4, Appendix 8.1: Climate data sources and assumptions [EN010158/APP/6.4]**. The GHG savings of the Proposed Development would outweigh the emissions associated with its construction, operation (including maintenance and replacement), and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			decommissioning, resulting in net GHG savings of over 3 million tonnes of CO_2e.	
Community benefit				
Footpaths	EM_67	Comment that new walking routes should be created.	The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths within the Site. The new permissive footpaths would be as follows: • A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane; • A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and • A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way. The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			landowner post-decommissioning. Further detail of the proposed permissive footpaths is provided in the **Outline RoWAS [EN010158/APP/7.8]** and **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.	
Compensation	EM_85	Comment that there should be financial compensation due to a drop in property values.	National Planning Practice Guidance advises that in general, planning is concerned with land use in the public interest. As a result of this, the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be considered as a material planning consideration and is not a matter for assessment under the 2017 EIA Regulations. An assessment of the effects of development on property value was therefore considered to not be required as part of the socio-economic assessment within the Environmental Impact Assessment for the Proposed Development. The Applicant can confirm, however, that the ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Document [EN010158/APP/5.8] and **Outline LEMP [EN010158/APP/7.6].** No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential property from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport. Visual amenity aside, Part 1 of The Land Compensation Act 1973 makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects (including noise, smoke and fumes, but not including loss of value due to a diminished view or visual impact) of the use of development works such as this.	
Funding	EM_18, EM_102, EM_110, EM_46, EM_85, EM_89, EM_94, EM_09, EM_44	Comment that the proposed community benefit fund is inadequate, including that it would not compensate for the	The Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		impacts of the Proposed Development.	to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The total amount of funding would be based on the final installed capacity of the Proposed Development. The Community Fund would be index linked from the first payment, with the RPI base rate linked to the operation date of the Proposed Development and reviewed annually.	
Funding	EM_102, EM_110, EM_155, EM_89	Comment that community benefit should include free or reduced electricity.	The Applicant is unable to provide free or discounted electricity for residents closest to the Proposed Development. However, the Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The total amount of funding would be based on the final installed capacity of the Proposed Development. The Community Fund would be index linked from the first payment, with the RPI base rate linked to the	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			operation date of the Proposed Development and reviewed annually.	
Funding	EM_89	Comment that the fund should be used to maintain/restore local roads that have previously been affected by construction vehicles.	Road repairs are the responsibility of Buckinghamshire Council as the local roads authority. The Applicant cannot undertake wide area road improvements as a wider benefit to the community. Where roads on the proposed access route to the Site, as described in **Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** require improvements to enable the safe and efficient movement of construction materials and staff, these works would be undertaken to adoptable Council standards and could be made permanent, should the Council permit this. Works to Snake Lane/Fidlers Field would be required in the event that the Council or HS2 did not undertake the necessary works prior to the Proposed Development commencing. These would be funded by the Applicant, along with other minor works as attached to the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** These works could be made permanent if requested by the Council.	N
Connecting to the grid				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Grid connection	EM_41	Comment that there is not an appropriate grid connection.	The Applicant has secured a grid connection agreement as set out in the **Grid Connection Statement [EN010158/APP/7.1]**.	N
Construction				
Working hours	EM_47, EM_49, EM_72, EM_78, EM_79, EM_80, EM_86, EM_88, EM_99, EM_105, EM_109, EM_132, EM_143, EM_146, EM_149, EM_73, EM_102, EM_110, EM_113, EM_41, EM_141, EM_89, EM_90, EM_87	Comment that working hours are too long.	Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with the host authority. This is secured in the **Outline Construction Environmental Management Plan [EN010158/APP/7.2]**.	Y
Approach to assessment	EM_72	Comments that the impact of construction has not been adequately assessed.	The construction phase of the Proposed Development has been assessed within the EIA, based on the worst-case maximum parameters set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and secured in the **Design Commitments [EN010158/APP/5.9]**. An assessment of the construction phase for each environmental factor is outlined in **ES Volume 2,**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Chapter 6 -16 [EN010158/APP/6.2] and relevant measures to mitigate impacts during the construction phase are detailed in the **Outline CEMP [EN010158/APP/7.2]** and **Outline CTMP [EN010158/APP7.5]**.	
Construction workers	EM_57, EM_98, EM_23, EM_30	Comments that there would be an impact from workers travelling to the Proposed Development.	An assessment which considers the number of workers travelling to the Proposed Development is detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**, which concludes that there would be no significant adverse effects. An assessment on the effects of workers accommodation demand which considers the cumulative impact of other developments alongside the Proposed Development is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	N
Enforcement	EM_24, EM_29, EM_70	Comments that construction vehicles would not keep to the agreed upon routing.	Construction traffic would follow the proposed access strategy routes as outlined and secured in **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** This document also outlines the settlements that HGV traffic would not be allowed to travel through in order to access the site. These access routes would be regulated and controlled to ensure that they aren't used throughout construction. The traffic management measures within the CTMP would be provided to the Principal Contractor and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			they would be required to abide by these regulations as part of their commercial contract with the Applicant. Failure to follow the traffic management measures proposed would be a non-compliance matter and could result in contractors being subject to penalties and individual sanctions.	
Footpaths	EM_67	Comment that footpaths should be kept open during construction.	Existing Public Rights of Way that cross the Site have been retained as far as practicable and have been incorporated within multifunctional green and blue infrastructure corridors. Temporary closure of PRoWs is to be avoided as far as practicable, and temporary diversions would be preferred and provided for instead of temporary closures, where required. If a temporary diversion or closure is required, then it has been assumed that this would be in place for a period of up to 6 months during the construction phase, as set out within the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]**, the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and the **Outline CEMP [EN010158/APP/7.2]**. In some cases, diversions and closures made to existing PRoWs during the construction phase would become permanent into and beyond the operational (including maintenance) and decommissioning phase	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			of the Proposed Development. Where this is the case, these permanently diverted PRoWs would reflect an equivalent design to the existing PRoWs that they are replacing, based on user requirements. The **Outline RoWAS [EN010158/APP/7.8]** and **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** provides the detail of each permanent PRoW diversion and/or closure. As part of the **Outline RoWAS [EN010158/APP/7.8]**, a programme of PRoW temporary closures and diversions would be produced by the Applicant and its Principal Contractor prior to the commencement of the construction phase. Appropriate advanced notification of temporary and permanent PRoW diversions and/or closures would be provided to all relevant stakeholders prior to the commencement of the construction phase. Measures would be implemented to maintain public safety, the details of which are set out within the **Outline CEMP [EN010158/APP/7.2]**.	
Impact on local villages	EM_18, EM_24, EM_70	Comment that construction vehicles should not travel through local villages, including	The Applicant agrees with this comment. Construction traffic would follow the proposed access strategy routes (which have been designed to avoid local villages) as outlined and secured in **Outline Construction Traffic Management Plan (CTMP)**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		East Claydon and Botolph Claydon.	**[EN010158/APP/7.5].** This document outlines the settlements that HGV traffic would not be allowed to travel through in order to access the Site. These access routes would be regulated and controlled to ensure that they aren't used throughout construction.	
Lighting	EM_33, EM_107, EM_113, EM_36, EM_41, EM_46, EM_76, EM_144, EM_148, EM_152, EM_89, EM_94, EM_87	Concern about the impact of potential lighting from construction.	Consideration has been given to minimising light spill to limit effects on sensitive receptors. Throughout construction and operation, motion detection lighting or manually operated lighting would be used to avoid constant lighting. There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9]** and **Outline CEMP [EN010158/APP/7.2].**	N
Location of compounds	EM_18	Comment that it is unclear where the construction compounds would be located.	During the construction phase, three Primary Construction Compounds would be provided on Site, with three Secondary Construction Compounds being provided at different locations throughout the Solar PV development. The siting zones of the Primary and Secondary Construction Compounds are shown respectively as **Work No. 8A** and **Work No. 8B** on the **Works Plans [EN010158/APP/2.3]** and have	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			been indicatively identified in **ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3]**. A Primary and Secondary Construction Compound would be located in each of Parcels 1, 2 and 3. Each Primary Construction Compound would be no greater than 25,000m^2 in plan. The Primary Construction Compound within Parcel 2 may be split but the in-plan areas of the split Primary Compound would not cumulatively be greater than 25,000m^2 in plan. Each Secondary Construction Compound would be no greater than 1,250m^2 in plan.	
Maintenance	EM_09, EM_46	Comments that it is not clear who would be responsible for maintaining the roads during construction.	A wear and tear agreement would be in place between Buckinghamshire Council and the Applicant throughout construction to cover the cost of abnormal wear and tear on the road network between the A41 and the site access junctions. The wear and tear agreement would address concerns about possible damage to the public road, verges and structures. It would be based upon condition surveys of the road to ensure that the condition of the road does not deteriorate solely because of the construction works. Should defects occur on the road network leading from the A41, the Principal Contractor would maintain	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			a stockpile of road repair material on Site to undertake repair works quickly and efficiently, when authorised by Buckinghamshire Council to undertake interventions. For further detailed information on the maintenance and wear and tear agreement please review **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**	
Road safety	EM_44, EM_77, EM_95	Comment that there would be safety concerns around pedestrians, cyclists and equestrians during the construction phase.	Non-motorised road users including pedestrians, cyclists and equestrians are given consideration in terms of safety within section 4.10 of **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Measures to mitigate safety concerns include: the requirement for the Principal Contractor to ensure speed limits are adhered to by construction staff; installation of signage on Site to remind drivers of local speed limits and presence of pedestrians and cyclists; training for staff working on Site on how to react properly if encountering equestrians on an access route. It is considered that the mitigation measures proposed are appropriate and sufficient to address safety concerns for non-motorised road users.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Site access	EM_92, EM_93, EM_106, EM_33, EM_72, EM_78, EM_79, EM_80, EM_86, EM_88, EM_98, EM_99, EM_105, EM_109, EM_127, EM_130, EM_132, EM_143, EM_146, EM_149, EM_73, EM_102, EM_107, EM_110, EM_113, EM_118, EM_119, EM_120, EM_121, EM_122, EM_137, EM_139, EM_141	Comment that the proposed site access points are dangerous.	Within **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**, Section 3.1 outlines the design approach to access junctions. Safety measures include: vegetation trimming within the visibility splays to ensure sufficient sight lines for vehicles using the access junctions; junction bell mouths and initial track sections from the public road will feature a metalled road surface to reduce the opportunity for debris and mud to be deposited on the public road; the access junctions will be clearly signposted. It is considered that the mitigation measures proposed are appropriate and sufficient to address safety concerns for the proposed site access points.	N
Consultation				
General	EM_102, EM_110, EM_52, EM_76, EM_90, EM_95, EM_96, EM_100, EM_107	Comments that the Phase Two Consultation was insufficient.	The Applicant respectfully disagrees with this statement. The Applicant approached pre-application consultation with a commitment to ensuring that anyone with an interest in the Proposed Development could find out more and share their views. This included two phases of formal consultation and a targeted consultation, alongside a programme of	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			continuous stakeholder engagement. The Applicant is very grateful to all those who have responded to the consultation and engaged with the project team to help shape the Proposed Development. For more information about how the Applicant approached pre-application consultation and engagement, see the **Consultation Report [EN010158/APP/5.1]**.	
Information	EM_17	Comment that the battery storage proposals were not included in the plans.	The Applicant respectfully disagrees with this statement. Potential locations for the BESS were presented on the operational layout published for Phase Two Consultation and assessed as part of the PEIR (**Appendix I-1** of the **Consultation Report [EN010158/APP/5.2]**).	N
Materials	EM_18, EM_107, EM_39, EM_47	Comments on the consultation materials, including that leaflets and maps were not clear, that the PEIR was too complex, and that the materials were misleading.	The Applicant approached pre-application consultation with a commitment to ensuring consultees were given the opportunity to understand and provide feedback on the Proposed Development. The Applicant sought to ensure thorough, open, and transparent engagement and consultation on its proposals, and provided sufficient opportunities for interested parties to understand and influence its plans. The Applicant published information in a variety of different formats and levels of detail to ensure consultees were given the opportunity to understand and provide feedback on the Proposed Development	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			as part of its Phase Two Consultation. This included, for example, a non-technical summary of the PEIR and a Phase Two Consultation booklet which further summarised the potential significant effects of the Proposed Development presented in the PEIR. Information on how the Applicant conducted its Phase Two Consultation is provided in **Chapter 5** of the **Consultation Report [EN010158/APP/5.1].** Copies of the Phase Two Consultation materials are provided in **Appendices G-2, G-3 and I-1** of the **Consultation Report [EN010158/APP/5.2]**. A **Consultation Report [EN010158/APP/5.1]** accompanies the Application which sets out how the Applicant has complied with all relevant legislation, guidance and advice notes. This includes **Appendix L-1 [EN010158/APP/5.2]** which details how the Applicant has complied with guidance on the pre-application stage for NSIPs.	
Optionality	EM_92, EM_93, EM_106, EM_33, EM_47, EM_49, EM_72, EM_78, EM_79, EM_80, EM_86, EM_88, EM_99, EM_105, EM_127, EM_130,	Comment that the consultation was not adequate because of optionality presented in the design of the Proposed Development and that the assessments and studies	The **PEIR** (**Appendix I-1** of the **Consultation Report [EN010158/APP/5.2]**) provided a preliminary assessment accounting for the information available at the time of assessment. It also set out the further work required to inform the contents of the Environmental Statement. Where optionality of project elements existed, the PEIR assessed a reasonable	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_131, EM_132, EM_143, EM_146, EM_149, EM_73, EM_74, EM_129, EM_118, EM_122, EM_137, EM_140, EM_141	have not been completed.	worst-case location of each aspect of the design for each environmental factor assessment. Following Phase Two Consultation, the proposed locations of the BESS, Collector Compounds and Rosefield Substation were each narrowed down to single siting zones. Therefore, the Application has provided greater certainty regarding the proposed location of these elements. The **Environmental Statement [EN01058/APP/6.1-6.4]** is based on this proposed layout. Moreover, the locations of Rosefield Substation, BESS and Main Collector Compound were the subject of Targeted Consultation between 21 May – 16 July 2025. This included an Addendum to the PEIR confirming the likely environmental effects arising from the proposed location of these elements compared to those identified in the PEIR (see **Chapter 7** of the **Consultation Report [EN010158/APP/5.1]**). Should the Application be accepted for examination, interested parties would have the opportunity to consider and make comments on this as part of the examination process.	
Cultural heritage				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Assessment	EM_09, EM_68, EM_83	Comments about archaeological remains, including assessments have not been adequate, that there could be undiscovered archaeological remains and that archaeology could be impacted.	Geophysical survey has been undertaken across the Order Limits and there has been intrusive archaeological evaluation of areas proposed for hard infrastructure. The Applicant considers that this level of testing is robust and adequate. Technical appendices contain detailed information about the details of the survey effort, including **ES Volume 4, Appendix 9.2: Geophysical Survey Report** and **Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]** Archaeological mitigation for the remains identified within Parcel 3 has been agreed with Buckinghamshire Council's archaeological advisor and Historic England and would be secured by a DCO Requirement, including a programme of archaeological work post-consent in accordance with the **Archaeological Management Strategy [EN010158/APP/7.10].** Should consent be granted, investigations would be conducted across the areas outside of the development parcels, such as where cabling and access tracks are proposed, proportionate to the likely effects. These works would be carried out in accordance with a Written Scheme of Investigation agreed with the host authority and the	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Archaeological Management Strategy [EN010158/APP/7.10].	
General	EM_101, EM_09, EM_44, CSAG	Comments that there would be a negative impact on historic buildings within villages close to the Proposed Development.	The Applicant has included a Stage 1 Setting Impacts Assessment as part of its cultural heritage assessment which can be found in **Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.2]**. The design of the Proposed Development has been informed by this assessment and has sought to minimize any harm to the significance of the historic buildings and conservation areas close to the Proposed Development. The assessment concludes that significant effects are predicted to Pond Farmhouse (grade II listed building).	N
Setting	EM_06, EM_29, EM_31, EM_32, EM_43, EM_44, EM_46, EM_52, EM_68, EM_76, EM_77, EM_85, EM_89, EM_90, EM_94, EM_95, EM_96, EM_100,	Comments that the Proposed Development would impact on the area's historic rural landscape.	The impact of the Proposed Development on historic landscape character and how this contributes to the significance of heritage assets is assessed in the **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4]**).This has concluded that the change to the agricultural character would result in a moderate adverse (and significant) effect on Pond Farmhouse and minor adverse (and not significant) effects to other heritage assets through changes to	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_87, EM_139, CSAG		their setting. Further assessment of the effect of the Proposed Development on the local landscape is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. It should be noted that the degree of visual change to the landscape is not directly comparable to the level of harm (magnitude of impact) to heritage significance as heritage assets derive significance from their historic fabric as well as from their setting.	
Cumulative effects				
General	EM_22, EM_65, EM_09, EM_16, EM_29, EM_32, EM_35, EM_36, EM_41, EM_41, EM_43, EM_46, EM_48, EM_50, EM_52, EM_62, EM_68, EM_71, EM_76, EM_77, EM_83, EM_89, EM_90, EM_94, EM_95, EM_100, EM_87, EM_06,	Comment that the local area has already been impacted by a number of developments planned or under construction, which is industrialising the local area. Specific reference made to HS2, East West Rail, Grendon EFW and the prison.	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail and Grendon Prison. The assessment presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** concludes that there are a number of likely significant	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_30, EM_56, EM_91		inter-project residual cumulative effects on landscape and visual and biodiversity. These include a potential significant inter-project cumulative residual effect on Bechstein's bats with East Claydon BESS, East Claydon Greener Grid Park and Tuckey Solar Farm as they are anticipated to be displaced from the Claydon Brook, which is considered to be significant at the Local level as the area lies outside of the core sustenance zone. Depending on any collision risk for bats and trains, and the loss of foraging habitat, there is the potential for significant inter-project cumulative effects on bats with East West Rail. There is also potential for significant inter-project cumulative effects on foraging bats with Grendon Prison. The assessment has concluded significant inter-project cumulative effect on Local Character Area 5.7: Hogshaw Claylands and 7.3: Claydon Bowl, Bernwood Jubilee Way and PRoW between Botolph Claydon and Runt's Wood during the construction, operation (including maintenance) and decommissioning phases of the Proposed Development with East Claydon BESS, East Claydon Greener Grid Energy Park, Tuckey Solar Farm, East West Rail and Longbreach Solar Farm.	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			There are significant inter-project cumulative effects anticipated on the North Buckinghamshire Way and the Midshires Way during the construction and decommissioning and at Year 1 of the operation of the Proposed Development and significant inter-project cumulative effects on Sion Hill Farm at both Year 1 and Year 10 of the operational phase of the Proposed Development. There are also significant inter-project cumulative effects anticipated on the Swan's Way/Outer Aylesbury Ring during the operational phase of the Proposed Development. During the construction and at Year 1 of operation, there are anticipated to be significant inter-project cumulative effects on Granborough, PRoW between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road and PRoW between East Claydon/East Claydon Road from the Proposed Development and the East Claydon BESS development. A summary of the landscape and visual inter-project cumulative effects is detailed in Table 17.13 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
General	EM_92, EM_93, EM_106, EM_17, EM_18, EM_47, EM_72, EM_78, EM_79, EM_80, EM_86, EM_88, EM_99, EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149, EM_38, EM_63, EM_67, EM_84, EM_73, EM_74, EM_101, EM_102, EM_134, EM_129, EM_107, EM_110, EM_111, EM_113, EM_116, EM_118, EM_119, EM_120, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_126, EM_44, EM_52, EM_56, EM_137, EM_138, EM_139, EM_140,	Comment that cumulative effects from other developments in the area have not been adequately considered.	A detailed cumulative effects assessment has been undertaken for the purposes of the Environmental Statement as detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].** This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list. The criteria used to determine whether to include or exclude an existing development and/or approved development on the short list reflects the process established by the Planning Inspectorate's Advice on Cumulative Effects Assessment and has regard to relevant policy and guidance documents and consultation with the relevant statutory consultation bodies (particularly Buckinghamshire Council). The short list of other developments that have been assessed is detailed within Table 17.3 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_141, EM_150, EM_145, EM_155, EM_89, EM_94, EM_95, EM_96, EM_87			
General	EM_13	Comment that the Proposed Development would set a precedent for similar developments on agricultural land.	National Planning Policy establishes in NPS EN-3 that applicants should seek to locate developments of the Proposed Development's nature on suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land is shown to be necessary, poorer quality agricultural land is to be preferred. As outlined in the **Planning Statement [EN010158/APP/5.7]**, the use of agricultural land has proven to be necessary, and this precedent is not set by the Proposed Development but through National Policy. The Applicant has assessed the effect of the Proposed Development and agricultural land as detailed in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**.	
National Grid Substation	EM_81, EM_90, EM_95	Comments expressing concern about the location of the replacement East Claydon Substation.	The National Grid East Claydon Substation does not form part of the Proposed Development Application. It is understood that National Grid will consult on its proposals for the replacement East Claydon	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Substation and submit a planning application for the development.	
Decommissioning				
General	EM_14, EM_33, EM_72, EM_121, EM_122, EM_09, EM_147	Comments expressing concerns about the decommissioning phase and request for more information.	A detailed description of the decommissioning phase, timeframes and activities that would be undertaken is set out within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1].** The environmental assessments detailed in **ES Volume 1, Chapter 6 – 16 [EN010158/APP/6.1]** consider and assess the impact of the decommissioning phase of the Proposed Development.	N
Lifespan	EM_31, EM_43, EM_52	Comments stating that the Proposed Development only has a limited lifespan.	The operational life of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO [EN010158/APP/3.1].** Following the operational (including maintenance) phase, the Proposed Development would require decommissioning in accordance with the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4]**.	N
Recycling	EM_52, EM_76, EM_95	Query how the solar panels would be recycled.	Solar PV modules are made up of several materials, including a metal frame, of which approximately 99% can currently be recycled. When decommissioning the	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			Proposed Development, options to reuse or recycle materials available at the time would be explored to ensure that as much of the material as possible is recycled and diverted from landfills. More detail can be found in the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4]**.	
Reinstatement	EM_32, EM_75, EM_83, EM_94, EM_100	Comments that the land would not be able to be returned to its original state.	Following the operational phase of the project (40 years), the Proposed Development would be decommissioned and at the end of the decommissioning phase, the land would be returned to the landowner. The **Outline Soil Management Plan [EN010158/APP/7.7]** sets out the measures that would be undertaken to reinstate the soil, this includes reinstating the soil to its original Agricultural Land Classification Grade.	N
Ownership	EM_32, EM_44, EM_52, EM_75, EM_76	Query who would be responsible for maintaining and decommissioning the Proposed Development.	The Applicant is Rosefield Energyfarm Limited (company number 11618221). Should consent be granted, EDF power solutions UK (one of the companies which form the Applicant) is intended to build, operate, maintain and decommission the Proposed Development.	N
Design				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Bridleways	EM_58	Comments that there has been a lack of enhancements made to the bridleway network.	Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development which are relevant to the bridleway network. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. This specifically includes a new hedgerow along the eastern side of the bridleway along Splash Lane from the informal parking area. This planting is secured by the **Outline LEMP [EN010158/APP/7.6].**	Y
Collector compounds	EM_119, EM_120	Comment that the proposed locations of the Main Collector Compound and Rosefield Substation under Scenario 2 is unsuitable due to the visual impact from villages.	Following Phase Two Consultation, the proposed locations of the BESS, Collector Compounds and Rosefield Substation were each narrowed down to single siting zones. Therefore, the DCO Application now provides greater certainty regarding the proposed location of these elements. The **Environmental Statement [EN01058/APP/6.1-6.5]** is based on this proposed layout. Moreover, the locations of Rosefield Substation, BESS and Main Collector Compound were the subject of Targeted Consultation between 21 May – 16 July 2025. This included consultation on an Addendum to the PEIR confirming the likely	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			environmental effects arising from the proposed location of these elements compared to those identified in the PEIR (see **Chapter 7** of the **Consultation Report [EN010158/APP/5.1]**). The key topics in response to the Targeted Consultation can be found in **Appendix K-3: Summary of responses to targeted consultations and consideration by topic [EN010158/APP/5.2]**. As a result of these amendments, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** now reports at most moderate adverse (not significant) residual effects, therefore no significant adverse effects are reported on the visual amenity of residents of Botolph Claydon or any other settlement in the Order Limits.	
Design evolution	EM_107, EM_44, EM_147, EM_152, EM_89	Comments that the changes since Phase One Consultation has not addressed concerns of the local community.	The Applicant made extensive changes to the design of the Proposed Development over the pre-application period, in part to reduce effects on local communities and address concerns raised during consultation. Between Phase One and Phase Two consultations, the Applicant reduced the area proposed for solar PV to 279ha (from 448ha identified as potentially suitable for solar development). More information about how the design of the Proposed Development has evolved	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			over the pre-application period is available in the **Design Approach Document [EN010158/APP/5.8]**.	
General	EM_102	Comment that the Applicant has prioritised impacts on ecology and Claydon House over the impacts on residential amenity.	Impacts on heritage assets and ecology are strictly regulated through planning policy and legislation. The Applicant has therefore had regard to them in the design to ensure compliance. However, residential amenity has also been a key consideration throughout the design of the Proposed Development, as captured in Project Principle 2.2 in the **Design Approach Document [EN010158/APP/5.8]**. A detailed Resident Visual Amenity Assessment (RVAA) has been included in the **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]**, and other aspects of residential amenity such as noise have also been considered e.g. **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**. Further amendments to the design have been made following Phase Two Consultation, which include the provision of additional offsets and mitigation planting in the vicinity of properties at Calvert Cottages and Catherine Cottages and removing the option of siting the Rosefield Substation BESS and Main Collector Compound in Field E23 in Parcel 3, as well as	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			providing further detail on proposed planting around the boundaries of the Site. More information about how the design of the Proposed Development has evolved over the pre-application period is available in the **Design Approach Document [EN010158/APP/5.8]**.	
Parcel 1	EM_14	Request for solar panels at 10D/E (Fields B5 and B13) to be reduced and for thick tree planting to be implemented at the northern boundary to screen views from Calvert Cottages.	Following Phase Two Consultation and a visit to Calvert Cottages, solar PV development has been removed from Field B5 (within the area shown at grid squares 10D/E in the consultation questionnaire) and additional mitigation planting has been incorporated into the design of the Proposed Development on the northern and southern boundaries of Field B5 to create additional layers of screening vegetation. A hedgerow has also been incorporated along the eastern edge of Field B5 to screen views of Solar PV development in Field B13. These measures, combined with the offset of Solar PV development already included in the design of the Proposed Development prior to Phase Two Consultation would reduce visibility of the Proposed Development from Calvert Cottages. This planting would be secured by the **Outline LEMP [EN010158/APP/7.6].** More information about how the design of the Proposed Development has evolved over the pre-	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			application period is available in the **Design Approach Document [EN010158/APP/5.8]**. A detailed RVAA included in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]** reports that there would be no significant effects for residents of Calvert Cottages.	
Parcel 1	EM_14	Comments that the boundary of Field 10D along Calvert Road should be planted to ensure a wildlife corridor from the new "Green" bridge that is currently being built at Calvert by HS2.	Following Phase Two Consultation, solar PV development has been removed from Field B5 (within the area shown at grid square 10D in the consultation questionnaire) and additional mitigation planting has been indicated on the northern and southern boundaries of Field B5. This would ensure a green corridor along the southern edge of Calvert Road, that would connect towards the green bridge as far as possible within the Order Limits. This planting would be secured by the **Outline LEMP [EN010158/APP/7.6].** More information about how the design of the Proposed Development has evolved over the pre-application period is available in the **Design Approach Document [EN010158/APP/5.8]**.	Y
Scale	EM_92, EM_93, EM_106, EM_47, EM_72, EM_78,	Comments that the Proposed Development is too large.	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_79, EM_80, EM_86, EM_88, EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149, EM_34, EM_38, EM_84, EM_73, EM_74, EM_129, EM_113, EM_126, EM_35, EM_41, EM_46, EM_50, EM_56, EM_62, EM_71, EM_76, EM_81, EM_141, EM_150, EM_145, EM_89, EM_90, EM_94, EM_95, EM_96, EM_100		address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of schemes improves their economic efficiency, bringing power to market at the lowest cost possible. It is shown that larger schemes deliver energy more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity. The **Statement of Need [EN010158/APP/5.6]**, which supports the Application, provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for the Proposed Development, including its size and location. Following Phase Two Consultation, the design of the Proposed Development has been reviewed and revised to take account of stakeholder engagement, technical assessment and advice, and the outcomes of the Environmental Impact Assessment. This has	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			included amendments to the Order Limits and potential areas for Solar PV development as set out with the **Design Approach Document [EN010158/APP/5.8]**. This resulted in an overall reduction of the Order Limits to 675ha (compared to 875ha at Phase One and 744ha at Phase Two).	
Screening	EM_67	Comments that more trees and hedgerows should be included to screen the panels. Specific reference made to the need for screening along the well used walking route from the car park west of Botolph Claydon, along the permissive route to Runts Wood.	Following Phase Two Consultation, certain mitigation measures have been embedded into the design of the Proposed Development. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. This specifically includes a new hedgerow along the eastern side of the bridleway along Splash Lane from the informal car park west of Botolph Claydon, as well as to the east of the Bernwood Jubilee Way. This planting would be secured by the **Outline LEMP [EN010158/APP/7.6].**	Y
Weir Lane	EM_102	Comments that proposed solar panels close to Bernwood Farm and Weir Lane should be removed.	The design of the Proposed Development has evolved following further consideration of views from Botolph Claydon and the conservation area. The fields closest to Bernwood Farm and Weir Lane were not considered for solar PV development at Phase	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			One Consultation and were removed from the Order Limits altogether prior to the Phase Two Consultation. A detailed RVAA included in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]** reports that significant residual effects would remain for Bernwood Farm only.	
Design evolution	EM_34	Comments that the changes since Phase One Consultation has been a welcome improvement.	The Applicant thanks the respondent for this comment.	N
General	EM_126	Comments that the size of the Proposed Development could expand in the future.	The Applicant does not have any plans to expand the Proposed Development. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** confirms that, to maintain flexibility in the design, the Applicant has used the 'Rochdale Envelope' approach in assessing the impacts of the Proposed Development. This approach establishes maximum and, where relevant, minimum parameters. These parameters are secured under the Design Parameters section of **Design Commitments [EN010158/APP/5.9]**. The Proposed Development would also be restricted by the maximum areas shown on the **Works Plans [EN010158/APP/2.3]**. If granted, the development consent order would	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			require that the Proposed Development must be constructed within these parameters. The Applicant is not seeking to change these parameters and any significant change would likely require the Applicant to prepare and submit a material change request application for review by the Examining Authority or Secretary of State.	
Grazing	EM_94, EM_100, EM_87	Comments expressing concern around the loss of grazing land.	The Applicant intends to incorporate grazing management both underneath panels and elsewhere, within the Order Limits as part of the Proposed Development, recognising the importance of grazing animals to foraging bats. Grazing is a common technique used for vegetation management on solar farm developments and is considered viable as a management technique within the Site. Opportunities for grazing will be considered where practicable. For the Proposed Development the habitats that would benefit from conservation grazing are the grassland areas for ground nesting birds, species rich grassland in general mitigation areas, and the grassland beneath and around the panels created for biodiversity enhancement. Grazing in and around panels would commonly be carried out using sheep, as they are less likely to damage infrastructure than	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			larger herbivores. However, cattle may be used to graze the larger grassland areas such as the other neutral grassland areas for ground nesting birds. Details of the grazing management proposals are provided in the **Outline LEMP [EN010158/APP/7.6]**. Details such as timings and stocking densities would be provided in the LEMP(s) at the detailed design stage.	
Orchard Way	EM_34	Suggestion that the panels could be moved back from Orchard Way towards Runts Wood to protect views from this road.	The Applicant made significant changes to the design of the Proposed Development over the pre-application period, in part to reduce effects on local road users and communities. Between Phase One and Phase Two consultations, the Applicant reduced the area of Proposed Development which included setting solar PV back to the south of Orchard Way, Calvert Road and Runts Wood .Further changes to the design including the removal of Field B5, Field B11, Field B9 (partial), Field B23 (north) to reduce the effects to property and road users. More information about how the design of the Proposed Development has evolved over the pre-application period is available **in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1**],**Design Approach Document [EN010158/APP/5.8]**. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			[EN010158/APP/6.2] reports that there would be no significant effects on users of Orchard Way and Calvert Road.	
Splash Lane	EM_87	Request for a 50m offset from Splash Lane to improve experience and reduce visual impact during operation.	Whilst it has not been possible to incorporate a 50m offset from Splash Lane, following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. This specifically includes a new hedgerow along the eastern side of the bridleway along Splash Lane from the informal parking area, as well as to the east of the Bernwood Jubilee Way. This planting would be secured by the **Outline LEMP [EN010158/APP/7.6].** The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that visual effects for users of Splash Lane would reduce from major (significant) adverse at Year 1 to moderate (significant) adverse effects at Year 10 which reflects the loss of longer distance views as a result of the maturing hedgerows.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Topography	EM_44	Comments that siting solar panels on north facing slopes are not an efficient use of land.	Sloping land is useful for solar generation, though there is flexibility within the fixed parameters to make adjustments at the detailed design stage to account for the topography e.g. the spacing between the rows of the solar PV panels to account for the angle of the sun. This flexibility is part of the optimisation of the site and contributes to the best use of land available. The EIA undertaken in support of the Proposed Development and presented in the **Environmental Statement [EN010158/APP/6.1 to 6.5]** has taken into account the topography of the Site.	N
Human health and wellbeing				
Mental health	EM_99, EM_102, EM_110, EM_116, EM_83, EM_137, EM_152, EM_91, EM_95, EM_100, EM_87	Comments that the Proposed Development would have an impact on mental health. Specific references made to visual impact, noise from construction traffic and the BESS.	The Applicant recognises that mental health and wellbeing is an important consideration, and has set out the consideration of effects of the Proposed Development on mental health (which has been an important consideration throughout the design, assessment and consideration of mitigation measures of/for the Proposed Development, and will continue to be so during all phases of the Proposed Development, if consent is granted) in **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]**.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			This document considers relevant health pathways and determinants of health including visual impacts, noise from construction traffic and health and safety relating to the BESS. **Visual impacts:** **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** sets out that there are likely to be a mix of significant and non-significant effects on visual amenity, which are likely to translate into the potential for effects on physical and mental health and wellbeing, in some instances, and in the context that such pathways are often individual and subjective. Importantly, it is noted that: • The Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties; • Significant visual effects occur on some but not all of the ProW within and around the Site; • Mitigation is secured – both embedded and additional – to address effects where practicable, and this reflects good practice and has been developed iteratively through consultation and engagement. Mitigation is secured within the **Outline CEMP [EN010158/APP/7.2], Outline**	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			CTMP [EN010158/APP/7.5], Outline LEMP [EN010158/APP/7.6], with design measures also described in the **Design Approach Document [EN010158/APP/5.8].** In consideration of the significance of health-specific effects, based on the approach as set out through IEMA Guidance, it is considered that: • Changes, due to the Proposed Development, are not considered to have an *influential* effect on the ability to deliver current health policy and/or the ability to narrow health inequalities – though it is noted that consultation/engagement themes among stakeholders show consensus on the importance of the effect; • Change, due to the Proposed Development, would not exceed appropriate regulatory thresholds, guidance or statutory standards (as have been assessed by **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** to the effect that it would result in substantial harm to the visual environment; and In general, there is the potential for a slight or small change in the health baseline of the population – with some greater than small (i.e. significant) effects, albeit	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			this is subjective and geographically limited to locations and areas experiencing significant effects, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRoW), with no significant effects on residential properties and their inhabitants. **Noise from construction traffic:** **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** sets out that road traffic noise is considered in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**. It summarises that while in some cases the noise levels would increase, the effects aren't considered to be significant. Following the implementation of suitable additional mitigation measures, **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** reports a direct, temporary minor adverse effect, which is considered to be not significant. In terms of health-specific effects, based on the approach as set out through IEMA Guidance [**Ref. 2**], this assessment of a non-significant effect takes account of:	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			• The inherent consideration of health as a factor in setting community noise thresholds, as determined by WHO guidelines and the definition of LOAEL adopted in Planning Practice Guidance; • Change, due to the Proposed Development, being well within appropriate regulatory thresholds or statutory standards; • There being likely to be at most a small change in the health baseline of the population, albeit there is a clear relationship between changes that would result from the project and changes to health outcomes; and • Change, due to the Proposed Development, having at most a marginal effect (and likely to have no effect) on the ability to deliver current health policy and/or the ability to narrow health inequalities. **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health effects relating to electromagnetic radiation and battery failure / plume assessment / fire have been considered in relation to the BESS throughout the DCO documentation. This highlights the approach taken to considering the scale and likelihood of effects with health pathways, and draws upon assessments	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			and mitigation including the following to confirm that there is no likely significant residual effect on health: • **BESS Plume Assessment Summary [EN010158/APP/7.13]**; • **Outline Battery Safety Management Plan (BSMP) [EN010158/APP/7.9]** • **Outline CEMP [EN010158/APP/7.2]**, • **Outline OEMP [EN010158/APP/7.3].** In particular, the **Outline BSMP [EN010158/APP/7.9]** demonstrates that as well as the Applicant having significant internal expertise and robust processes in BESS development, the relevant stakeholders have been consulted and their responses have informed the design of the Proposed Development, and therefore safety would be inherent in the overall design, minimising the risk of a fire event occurring, and reducing the impact of such an event should it occur.	
Physical health	EM_77	Comments that the Proposed Development would have an impact on physical health.	The Applicant has set out the consideration of effects of the Proposed Development on physical health in **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]**, which considers relevant health pathways and determinants of	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			physical health where the environmental effects of the Proposed Development may influence this. **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** confirms the position that the applicant has considered health pathways and determinants of health relevant to the Proposed Development, in the context of the prevailing baseline / sensitivity, and in accordance with guidance, concluding that there are unlikely to be significant residual adverse health effects, and that where there is uncertainty, there is sufficient monitoring, management, engagement protocols and design measures in place to avoid adverse effects. **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** provides a summary of all of the likely significant (moderate and above) and minor significance effects reported within the ES, and describes them in terms of their relevance to health in-line with guidance. It identifies how mitigation has been considered within the assessment to avoid or reduce significant effects, where practicable. In order to consider sensitivity to change for health receptors, it provides an overview of the national and local policy and strategy of relevance to health and	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			wellbeing in the context of the Proposed Development, and then refers to relevant baseline information that informs the location, scale and sensitivity of populations relevant to experiencing health effects, and provides a health-specific baseline not previously included within the ES. Along with physical health and wellbeing effects, **ES Appendix 5.5 – Health and Wellbeing Summary Statement [EN010158/APP/6.4]** provides contextual information on the Applicant's consideration of significant mental health and wellbeing effects determinants, pathways and receptors in particular, and identifies the measures undertaken to address them within the Proposed Development and DCO Application.	
Landscape and visual				
General	EM_92, EM_93, EM_106, EM_33, EM_39, EM_47, EM_72, EM_78, EM_79, EM_88, EM_99, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146,	Comments that there would be a negative visual impact from the Proposed Development.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** includes detailed assessment of effects on visual receptors within the study area. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a major adverse (significant) effect on Sion Hill Farm, PRoW between Calvert	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_149, EM_34, EM_38, EM_63, EM_73, EM_74, EM_101, EM_104, EM_129, EM_108, EM_113, EM_116, EM_118, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_126, EM_09, EM_16, EM_23, EM_30, EM_31, EM_32, EM_41, EM_42, EM_43, EM_44, EM_46, EM_52, EM_62, EM_64, EM_76, EM_77, EM_81, EM_85, EM_137, EM_140, EM_141, EM_144, EM_147, EM_152, EM_89, EM_90, EM_94, EM_96, EM_87		Road and HS2 and PRoW between Botolph Claydon and Runt's Wood; a major/moderate adverse (significant) effect on LCA 9.1, 6-7 Catherine Cottages, Bernwood Farm, Bernwood Jubilee Way, PRoW to Finemere Hill and PRoW between East Claydon Road and Parcel 3; and a moderate adverse (significant) on LCA 5.7, LCA 7.3, 4-5 Catherine Cottages, promoted routes North Buckinghamshire Way/Midshires Way and Swan's Way/Outer Aylesbury Ring, Claydon House and Hogshaw Farm and Wildlife Park in the early years of operation. Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Green infrastructure proposals have been developed which include a considerable amount of proposed new hedgerow and native woodland. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the majority of significant effects would remain. In the case of 4-5 Catherine Cottages, 6-7 Catherine Cottages and the North Buckinghamshire Way/Midshires Way, relevant mitigation measures include the removal of Solar PV modules from Field	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			B5 and the Rosefield Substation and larger scale infrastructure from Field E23, as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), effects would be reduced to moderate (not significant) for 4-7 Catherine Cottages and moderate/minor (not significant) for users of the promoted route. It is acknowledged that residual effects cannot always be mitigated and such effects will be weighed in the planning balance (see **Planning Statement [EN010158/APP/5.7]**).	
Granborough	EM_47	Comments that Granborough has not been considered adequately in the LVIA assessment, including that there is only one viewpoint from Granborough, that the	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports there would be no significant adverse effect on the visual amenity of residents of Granborough. The representative viewpoint from the PRoW to the north of Church Lane can be found in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		viewpoint from Church Lane should be westerly, that cumulative projects would add to the visual impact which is not captured in the visualisation.	The mitigation of significant effects identified in the PEIR resulted from the removal of the Rosefield Substation and the Main Collector Compound from Field E23 and their location closer to the East Claydon Substation as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]** together with the green infrastructure proposals identified in the **Outline LEMP, Appendix 3 [EN010158/APP/7.6]**. The assessment of cumulative effects in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** reports a reduction of effects from major/moderate (significant) adverse at year 1 of operation to moderate (not significant) adverse by year 10. Hence there would be no long-term significant effects on the visual amenity of residents in Granborough.	
Fencing	EM_14, EM_67	Comments that the fencing around the solar panels would have a negative impact and more natural barriers should be used instead.	Perimeter fencing surrounding the Solar PV development would be offset at least 10m from either side of existing and proposed PRoW (see **ES Volume 3 Figure 3.12 - Typical Security Details [EN010158/APP/6.3]**). This would create a broad walking corridor for footpath users in the limited areas where Solar PV is proposed on both sides of a PRoW. Perimeter fencing surrounding the Solar PV	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			development would be sensitively designed to reduce potential impacts on the local environment and integrate with the landscape. It would comprise a timber post and wire mesh fence to minimise visual impact. Both of these design criteria are secured by the **Design Commitments [EN010158/APP/5.9]**.	
Lighting	EM_92, EM_93, EM_106, EM_33, EM_47, EM_49, EM_72, EM_78, EM_79, EM_80, EM_86, EM_88, EM_99, EM_105, EM_109, EM_127, EM_130, EM_132, EM_143, EM_146, EM_149, EM_107, EM_137	Comment that the impact of lighting has not been adequately assessed.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** considers the effects of temporary lighting during the construction phase as agreed with Buckinghamshire Council on the basis that there would be no permanent (continuous) lighting for security purposes except for at emergency exits. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9]** and **Outline CEMP [EN010158/APP/7.2]**.	N
Mitigation	EM_92, EM_93, EM_106, EM_39,	Comments that the proposed mitigation is	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_49, EM_72, EM_78, EM_79, EM_88, EM_99, EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_149, EM_73, EM_74, EM_102, EM_110, EM_113, EM_118, EM_09, EM_46, EM_152, EM_89, EM_90, EM_87	insufficient to screen the visual impact of the Proposed Development. Request for more mature plants to be used.	includes detailed assessment of effects on landscape and visual receptors within the study area. It is acknowledged that residual effects cannot always be mitigated and such effects have been weighed in the planning balance (see **Planning Statement [EN010158/APP/5.7]**). The planting specification for trees and shrubs would be confirmed within the detailed LEMP(s) at the discharge of requirements. They would typically be planted as young transplants or 'whips' with the use of extra heavy standards where more mature specimens are required e.g. to provide screening. This is secured by the **Outline LEMP [EN010158/APP/7.6]**, which also secures the heights that hedgerows should be maintained at in order to achieve their desired screening function.	
Land, soils and groundwater				
Assessment	EM_44, EM_144	Comment that soil assessments are not adequate.	The ALC surveys have been undertaken in line with the methodology set out in Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification for England and Wales: Revised Criteria for Grading the Quality of Agricultural Land (ALC011) and Natural England (2012) Agricultural Land Classification: Protecting the Best and Most Versatile Agricultural Land (TIN049). The methodology and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			conclusions of the agricultural land classification survey have been discussed and agreed with Natural England as set out in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].** The survey has been undertaken by soil scientists that have the scientific and technical expertise to provide and translate the results from field-based research and desk-studies into practical solutions. A statement of competance forms part of the ES and is presented in **ES Volume 4, Appendix 1.1: Statement of Competence [EN010158/APP/6.4].** The Applicant's assessment on the impacts on soil can be found in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** and the ALC survey results are included in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]**.	
Construction	EM_18, EM_75, EM_91	Comments expressing concern about impacts of construction on the land, including land drainage, soil quality and soil compaction.	The Applicant's assessment of potential effects on soil can be found in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2].** Soil disturbance has been minimised wherever possibly through mitigation outlined within the **Outline SMP [EN010158/APP/7.7]**. Soil quality would be returned to its pre-construction ALC grade as far as practicable on return to agricultural use and any damaged land	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			drains would be reinstated following the construction phase.	
Contamination	EM_14, EM_38, EM_107, EM_46, EM_150, EM_144, EM_148	Comments that there could be a potentially negative impact of water and chemical runoff on the soil.	During construction, operation (including maintenance) and decommissioning, measures would be in place, as secured in the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]** which include a management plan for dealing with hazardous materials, and actions to follow in the unlikely event of any accidental release of potentially contaminative materials. These mitigation measures would protect both soil and groundwater from contamination, preventing migration into geological units (see also **ES Volume 1, Chapter 11: Land and Groundwater [EN010158/APP/6.2] and Chapter 12: Soil [EN010158/APP/6.2]**). The **Outline Drainage Strategy [EN010158/APP/7.11]** provides detail on design principles which would prevent pollution from the BESS (either chemicals or fuels associated with construction or operation (including maintenance) activities, or contamination resulting from fire-fighting activities) entering the wider environment. The **Outline Battery Safety Management Plan [EN010158/APP/7.9**] also includes measures for protecting groundwater from	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			contamination, in case of any incidents associated with the BESS.	
General	EM_82, EM_33, EM_39, EM_130, EM_74, EM_102, EM_104, EM_134, EM_114, EM_107, EM_108, EM_110, EM_112, EM_118, EM_121, EM_122, EM_06, EM_09, EM_16, EM_23, EM_31, EM_32, EM_35, EM_36, EM_41, EM_43, EM_44, EM_46, EM_50, EM_56, EM_58, EM_64, EM_68, EM_81, EM_138, EM_140, EM_150, EM_147, EM_148, EM_155, EM_89, EM_94, EM_100, EM_87 EM_14, EM_49, EM_34, EM_38,	Comments expressing opposition to the loss of agricultural land as a result of the Proposed Development, including that it is a threat to food security.	Following the amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. The utilised agricultural area (UAA) is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.005% of the UAA. Additionally, during operation the potential for grazing on a significant part of the Site is being considered. This would help increase soil organic matter and overall soil quality.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_101, EM_117, EM_23, EM_52, EM_89, EM_94, EM_87			
Groundwater	EM_152	Comment that there would be an impact on groundwater.	During construction, operation (including maintenance) and decommissioning, measures would be in place to protect groundwater and any potential contamination, as secured in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. These include undertaking a ground investigation to assess the potential for existing contamination, good housekeeping and site maintenance, emergency procedures to manage accidental spillages and leaks, and management plans to cover the use of HDD (including use of drilling muds).	N
Location of the Proposed Development				
Alternatives	EM_44, EM_95	Alternative locations for the project were not thoroughly considered	**Appendix 1 - Site Selection Report** of the **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for why the Proposed Development is located in this particular location. This includes commentary on how the Site was selected considering a range of objectives and requirements,	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			including proximity to the National Grid East Claydon Substation, existence of sufficient land to meet the scale of the Proposed Development's aims and the desire to avoid the need for large-scale compulsory acquisitions.	
General	EM_82, EM_65, EM_129, EM_117, EM_107, EM_111, EM_112, EM_113, EM_119, EM_120, EM_121, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_126, EM_35, EM_44, EM_46, EM_62, EM_64, EM_81, EM_150, EM_145, EM_147, EM_152, EM_91, EM_95, EM_96, EM_100, EM_22, EM_146, EM_126, EM_17, EM_148	This is not a suitable location for the Proposed Development. Specific comments referenced proximity to local communities, proximity to a conservation area, proximity to an SSSI.	**Appendix 1 - Site Selection Report** of the **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for why the Proposed Development is located in this particular location. This includes commentary on how the Site was selected considering a range of objectives and requirements, including proximity to local communities, conservation areas and environmental designations, including SSSIs.	N
Need				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Capacity	EM_92, EM_93, EM_106, EM_33, EM_39, EM_47, EM_49, EM_72, EM_79, EM_80, EM_86, EM_88, EM_98, EM_99, EM_105, EM_109, EM_132, EM_143, EM_146, EM_149, EM_63, EM_84, EM_73, EM_74, EM_102, EM_110, EM_111, EM_118, EM_119, EM_120, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_29, EM_30, EM_32, EM_35, EM_62, EM_64, EM_71, EM_76, EM_77, EM_81, EM_141, EM_155, EM_89, EM_90, EM_94, EM_96, EM_87	Comments that the TEC Register has more solar capacity than required and therefore the Proposed Development should be cancelled.	It is not a given that projects listed on a register would be developed at the capacity stated, or at the timeframes stated, if they are developed at all. Section 6.3 of the **Statement of Need [EN010158/APP/5.7]** provides evidence on the level of attrition experienced in pipeline registers (including, among others, the TEC Register) and at different stages of development. Section 3.7 of the Statement of Need describes reforms being taken under the Connections Action Plan to deter speculative connection applications and remove stalled schemes from the connections queue, while government's Clean Power 2030 Action Plan, discussed in Section 3.9 of the Statement of Need, describes how the grid connections queue must be reduced to "prioritise projects needed for 2030, while maintain[ing] a robust pipeline [of projects] beyond 2030". Evidence of the readiness of the Project Development has been submitted to NESO under the Connections Reform process to inform NESO's assessment of its position in a re-ordered connection queue.	N
Noise and vibration				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Construction	EM_14, EM_33, EM_38, EM_129, EM_113, EM_126, EM_30, EM_35, EM_36, EM_41, EM_56, EM_62, EM_70, EM_76, EM_77, EM_83, EM_144, EM_147, EM_89, EM_90, EM_94, EM_95, EM_87	Comments expressing concern about noise during construction.	A noise impact assessment for the construction phase of the Proposed Development has been undertaken and presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**. The assessment shows that following the application of additional mitigation measures (such as selection of lower noise equipment, noise barriers and equipment orientation), the predicted construction phase noise levels throughout daytime and night-time periods would not result in any significant adverse effects. Construction working hours on site would be from 7am to 7pm Monday to Friday and 7am to 12pm on Saturday. No working would be permitted on Sundays or Bank Holidays. Between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors.	Y
Assessment	EM_92, EM_93, EM_106, EM_39, EM_47, EM_49, EM_72, EM_78, EM_79, EM_88, EM_98, EM_99,	Comments that there has been no assessment of noise.	A noise impact assessment has been undertaken and presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** The assessment shows that following the application of additional mitigation measures (such as selection of lower noise equipment, noise barriers and equipment orientation),	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149, EM_73, EM_74, EM_107, EM_113, EM_118, EM_122, EM_137, EM_152		the predicted noise levels throughout daytime and night-time periods would not result in any significant adverse effects. This is in line with the BS 4142/BS 8233/WHO Guidelines for Community Noise and guidance in Planning Practice Guidance **[Ref. 13-21]**, which defines noise below the lowest observed adverse effect level (LOAEL).	
Battery storage	EM_107, EM_119, EM_120, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_30, EM_41, EM_50, EM_71, EM_81, EM_139, EM_140, EM_141, EM_150, EM_148	Comments expressing concern about noise from the battery storage.	The noise impact of all the noise emitting plant items associated with the Proposed Development (including the battery storage) is included within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** The assessment shows that following the application of additional mitigation measures (such as selection of lower noise equipment, noise barriers and equipment orientation), the predicted operation (including maintenance) phase noise levels throughout daytime and night-time periods would not result in any significant adverse effects.	N
General	EM_38, EM_104, EM_117, EM_116, EM_126, EM_31, EM_35, EM_36,	Comments expressing concern about noise during operation.	A noise impact assessment for the operational phase (including maintenance) has been undertaken and presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** The assessment	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_44, EM_50, EM_52, EM_62, EM_76, EM_77, EM_147, EM_89, EM_91, EM_95, EM_100, EM_87		shows that following the application of additional mitigation measures (such as selection of lower noise equipment, noise barriers and equipment orientation), the predicted operation (including maintenance) phase noise levels throughout daytime and night-time periods would not result in any significant adverse effects.	
Wildlife	EM_101, EM_30, EM_44	Comments expressing concern about impact of noise on animals.	The Applicant has provided commentary on potential impacts on PRoW users (that go through agricultural land) from noise and vibration during the construction phase in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** (**Section 13.8**). Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works.	N
Operation				
Lighting	EM_117, EM_107, EM_32, EM_36, EM_44, EM_71,	Comments expressing concerns about lighting during operation.	Consideration has been given to minimising light spill to limit effects on sensitive receptors. Throughout the operation (including maintenance) phase, the use of	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_152, EM_95, EM_100, EM_87		motion detection lighting or manually operated lighting would be used to avoid constant lighting. There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9]** and **Outline CEMP [EN010158/APP/7.2].**	
Maintenance	EM_18	Query who would be responsible for maintaining the pond and surrounding area in Weir Lane.	Should consent be granted, EDF power solutions UK (one of the companies which form the Applicant) intends to build, operate, maintain and decommission the Proposed Development. The pond and surrounding area in Weir Lane referenced in the response falls outside of the Order Limits and therefore the Applicant would not be responsible for maintaining this area.	N
Replacement	EM_76	Comments that the panels would need to be replaced at least once during the operation of the Proposed Development.	The service life of the panels is 40 years which is the operational life for the Proposed Development. Assets with a service life of 40 years would not require any replacement unless damaged or faulty. As reflected in **ES Volume 3, Chapter 8: Climate [EN010158/APP/6.3]**. the total emissions associated with the solar PV (including embodied carbon, transport to site and end of life decommissioning and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			disposal) have been uplifted by 5% to account for construction wastage. This therefore more than sufficiently covers the emissions from solar PV modules that may be required for replacement (0.5%) and construction wastage (0.2%).	
Policy				
Compliance	EM_41, EM_87	Comments stating that the Proposed Development is not compliant with the Vale of Aylesbury Local Plan.	The Applicant has had ongoing regard for the policies contained within the Vale of Aylesbury Local Plan. The Proposed Development's compliance with the Local Plan is evidenced through Table 6 of **Appendix 4 - Policy Compliance Assessment Tables** which is appended to the **Planning Statement [EN010158/APP/5.7]**.	N
Population				
House prices	EM_134, EM_41, EM_52, EM_56, EM_145	Comments that there would be a reduction in local property prices as a result of the Proposed Development.	National Planning Practice Guidance advises that in general, planning is concerned with land use in the public interest. As a result of this, the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be considered as a material planning consideration and is not a matter for assessment under the 2017 EIA Regulations.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			An assessment of the effects of development on property value was therefore considered to not be required as part of the socio-economic assessment within the Environmental Impact Assessment for the Proposed Development. The Applicant can confirm, however, that the ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8]** and **Outline LEMP [EN010158/APP/7.6].** No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential property from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport. Visual amenity aside, Part 1 of The Land Compensation Act 1973 makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			a result of the physical effects (including noise, smoke and fumes, but not including loss of value due to a diminished view or visual impact) of the use of development works such as this.	
Impact on local businesses	EM_92, EM_93, EM_106, EM_14, EM_33, EM_39, EM_49, EM_72, EM_78, EM_88, EM_105, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149, EM_63, EM_73, EM_74, EM_101, EM_102, EM_104, EM_134, EM_107, EM_108, EM_110, EM_113, EM_116, EM_118, EM_121, EM_122, EM_06, EM_09, EM_16, EM_29, EM_32, EM_35, EM_36, EM_41, EM_43, EM_44, EM_46,	Comments expressing concerns about impact on tenant farmers.	The Applicant has assessed the potential socio-economic effects of the Proposed Development on agricultural businesses and landholdings (see **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**). Potential effects on agricultural and non-agricultural employment and business viability within the Order Limits would be mitigated (or compensated for) through the development of financial compensation and/or land swaps in order to provide continuity for employment and socio-economic activity where practicable. With this mitigation, the Applicant considers that there would not be a significant effect on agricultural businesses and landholdings as a result of the Proposed Development.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_50, EM_52, EM_56, EM_62, EM_68, EM_71, EM_76, EM_77, EM_83, EM_141, EM_150, EM_147, EM_89, EM_90, EM_91, EM_94, EM_95, EM_100, EM_87			
Impact on local businesses	EM_92, EM_93, EM_106, EM_39, EM_47, EM_72, EM_79, EM_88, EM_105, EM_109, EM_127, EM_130, EM_131, EM_132, EM_143, EM_146, EM_149, EM_63, EM_73, EM_74, EM_129, EM_107, EM_113, EM_118, EM_44, EM_46, EM_62, EM_83, EM_141, EM_89, EM_94, EM_96,	Comments expressing concerns about impact on local businesses.	The Applicant has assessed the effects on agricultural landholdings and other businesses within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2].** The assessment reviews and considers the changes in land availability, access, and environment to be experienced by landowners and tenants within the Order Limits, and businesses operating in the vicinity, taking into account their individual circumstances and in the context of any negotiations on monetary compensation and (where appropriate and practicable) alternative land provision to demonstrate accordance with statutory requirements and due consideration of the potential for significant effects on the operators.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_100, EM_56, EM_48		Where relevant, this therefore includes a summary of land changes and (in some cases) significant effects (and embedded and additional mitigation) reported in the following chapters of the ES where relevant: • Noise (**ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**); • Air Quality (**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**); • Transport and Access (**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**); • Cultural Heritage (**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2])** and • Landscape and Views **(ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**). In all cases at the point of submission of this application, Heads of Terms have been agreed for commercial agreements with agricultural and non-agricultural businesses currently using land within the Order Limits such that effects on viability of those businesses would not be adversely affected. Some businesses outside of the Order Limits would experience environmental change during construction and operational phases, but effects are not considered to be significant in terms of the effect on	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			viability of those businesses following the application of mitigation measures.	
Socio-economics	EM_58	Comments expressing concerns around the socioeconomic impacts of the Proposed Development on the equestrian community.	The Applicant has assessed the effects on other businesses including equestrian-related businesses and assessed the effects on equestrian infrastructure such as bridleways as part of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The assessment summarises that in all cases at the point of submission of this application, Heads of Terms have been agreed for commercial agreements with agricultural and non-agricultural businesses currently using land within the Order Limits such that effects on viability of those businesses would not be adversely affected. The Applicant has developed the scheme in response to concerns raised by some equestrian sector businesses in order to avoid or reduce effects on these businesses operating practices and to limit environmental change. The Applicant has taken advice from concerned non-agricultural businesses during the scheme design and statutory consultation phases, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			noise and accessibility effects perceived by these businesses. In order to limit disruption to land used by TCS Biosciences, based on this organisation's feedback the Applicant has: • Removed the option consulted on previously for a substation to be included on Field 23 (which will now be a field of solar panels), thereby reducing perceived operational noise effects; and • Confirmed and secured in the **Design Approach Document [EN010158/APP/5.8]** that at the detailed design stage, the solar panel arrangement for Field E23 will be designed to incorporate movement corridors for TCS Biosciences sheep and/or horses to cross the field to access their other adjacent grazing fields. There are several bridleways that interact with the Proposed Development, set out within Table 14.19 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. However, these routes are not affected by the Proposed Development in terms of access and connectivity. The assessment summarises that overall, there is likely to be a **slight adverse** residual effect on community access (PRoW	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			and Permissive Paths) and their users (WCH), which is considered to be **not significant.** Within this, for equestrian users specifically, there is unlikely to be an effect. Where PRoWs may need to be temporarily diverted or closed, the duration of such a diversion/closure in that area would be for a maximum period of 6 months. The **Outline RoWAS [EN010158/APP/7.8]** details this and forms the framework for detailed RoWAS for long-term diversions, which are to be developed by the principal contractor to cover all phases of the Proposed Development.	
Tourism	EM_33, EM_126, EM_23, EM_32, EM_46	Comment that the Proposed Development could have a negative impact on tourism which would damage the local economy.	The Applicant has assessed the effects on the tourist economy and tourist sector receptors within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The tourist economy is determined by the number and type of receptors including attractions and facilities, accommodation and recreational interests that form the areas wider tourist 'draw'. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** as reviewed the environmental effects on such receptors relating to landscape and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			visual, cultural heritage, transport and access, noise and air quality and reports where there is likely to be significant residual effects on amenity across these environmental assessments, and describes mitigation related to them. As such, it draws upon the following chapters to assess effects on tourism and the tourist economy: • Noise (**ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**); • Air Quality (**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**); • Transport and Access (**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**); • Landscape and Views (**ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**); and • Cultural Heritage (**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**). The assessment does not attempt to quantify the in-combination amenity effects of different environmental effects on the tourist economy given the number of variables and externalities but presents a summary of potential effects based on professional judgement. It	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			takes into account the likelihood of impacts translating to negative perceptions and then translating to visitor behavioural changes in the context of the scale and characteristics of receptors. Following the implementation of embedded and additional mitigation, it is reported in **ES Volume 2, Chapters 6, 9, 10, 13** and **15 [EN010158/APP/6.2]** that effects are not significant in terms of traffic and access, noise, or air quality, and changes to visual amenity and cultural heritage, where significant, are localised. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited and managed by embedded and additional mitigation within the **Outline CTMP [EN010158/APP/7.5]**, **Outline LEMP [EN010158/APP/7.6]** and **Outline CEMP [EN010158/APP/7.2]**. Therefore, there is likely to be a **temporary slight adverse** residual effect on tourism, which is considered to be **not significant**.	
Public Rights of Way and permissive footpaths				

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Visual impact	EM_29, EM_44	Comments that the visual amenity of existing PRoW would be impacted by the Proposed Development.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a major adverse (significant) effect on users of PRoW between Calvert Road and HS2 and PRoW between Botolph Claydon and Runt's Wood; a major/moderate adverse (significant) effect on users of Bernwood Jubilee Way, PRoW to Finemere Hill and PRoW between East Claydon Road and Parcel 3; and a moderate adverse (significant) effect on users of promoted routes North Buckinghamshire Way/Midshires Way and Swan's Way/Outer Aylesbury Ring. Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. Green infrastructure proposals have been developed which include c. 4km of proposed new hedgerows and over 8.5 hectares of proposed native woodland. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the majority of significant effects would remain. In the case of the North Buckinghamshire Way/Midshires Way, relevant mitigation measures include the removal of the Rosefield Substation and	Y

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			larger scale infrastructure from Field E23, with Solar PV modules now only proposed in E23 and the Main Collector Compound (to 6m) in E21-22 as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3]**. Together with green infrastructure proposals by year 10 (following the establishment of mitigation planting), effects would be reduced to moderate/minor (not significant) for users of the promoted route. It is acknowledged that effects on visual amenity of PRoW users cannot always be mitigated and such effects will be weighed in the planning balance (see the **Planning Statement [EN010158/APP/5.7]**).	
Car parking	EM_67	Comments that a second car park further to the west of the Site near to Calvert and Steeple Claydon should be created to increase use of new footpath trail.	The Applicant is not proposing to create a car park in the suggested location. The creation of a car park would not be in fitting with the development of sustainable and active travel links in the area and would require the loss of further hedgerow to create a compliant and safe access junction.	N
Car parking	EM_67	Comments that the car park to the west of Botolph Claydon should be improved to allow	This area is located outside the Order Limits and therefore the Applicant is not able to provide upgrades to the car park.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		better access to the footpath trails.		
Cyclists		Comments that upgrades for cyclists should be considered, including new routes and safety measures, including providing better links to Cycle Route 51 and Buckinghamshire Greenway.	The Applicant does not control areas located outside the proposed Order Limits and is unable to deliver links to Cycle Route 51 or a new stretch of the Buckinghamshire Greenway as part of the Proposed Development.	N
Equestrian	EM_58	Comment that bridleways and the equestrian use of the site has not been adequately considered.	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** includes all relevant bridleways. Due to the proposed mitigation hedgerow heights, the experience of riders on horseback is not assessed separately as they would experience the same degree of visibility at Year 0 and Year 10 as people on foot.	N
Equestrian	EM_58	Comments that there are opportunities to enhance and improve the bridleway network, by upgrading existing PRoW to connect	The majority of these existing PRoW are located outside the Order Limits and therefore the Applicant has no control over the status of these routes. For those routes within the Order Limits, the operational life of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		bridleways together. Specific reference made to MCL/12/1, MCL/7/1, ECL/6/1, HOG/4/1, ECL/1/1, HOG/2/1, HOG/2/2. HOG/2/3, QUA/38/2, ECL/8/2, QUA/41/1, QUA/38/1, QUA/39/1, QUA/35/1, QUA/35/2, GUN/30/1, HOG/4/2	**[EN010158/APP/3.1]**. Upgrading footpaths to bridleways would require a permanent change to be in place beyond the operational lifetime of the Proposed Development, which is not in the control of the Applicant. The Applicant is proposing to enhance approximately 2.3km of existing PRoW and provide approximately 3.1km of new permissive paths to improve connectivity within the area and around the Order Limits. These are secured by the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and the **Outline RoWAS [EN010158/APP/7.8]**.	
Loss of access	EM_29, EM_44, EM_83, EM_91, EM_77, EM_100	Comments that there would be a loss of access to existing footpaths and green space during the lifetime of the Proposed Development, including closures during construction, and loss of access during operation.	Five PRoW would be permanently diverted as part of the Proposed Development. These diversions would reduce visual effects for users of the PRoW, by diverting around the edges of fields, and/or enhance connectivity to other routes offsite, reducing the distance that users currently walk along roads. The diversions to PRoW would be undertaken and completed during the construction phase of the Proposed Development. These diversions would then become permanent and be in place in perpetuity. The **Outline RoWAS [EN010158/APP/7.8]** and **Streets, Rights of Way and Access Plans**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			[EN010158/APP/2.4] provide the detail of each permanent PRoW diversion/closure. The remainder of PRoW that cross the Site have been incorporated within multifunctional green and blue infrastructure corridors. During the 30-month construction phase, existing PRoWs and Permissive Paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. The diversion works would be 2m in width and would provide a 10m approximate diversion to allow the access track works to slightly pass the crossing point. Ducting would be provided to allow cabling works at a later stage that would not disrupt footpath access, as set out within the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8]**, the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** and the **Outline CEMP [EN010158/APP/7.2]**. As part of the **Outline RoWAS [EN010158/APP/7.8]**, a programme of PRoW temporary diversions during construction would be produced by the Applicant and	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			its principal contractor prior to the commencement of the construction phase. Appropriate advanced notification of temporary and permanent PRoW diversions and/or closures would be provided to all relevant stakeholders prior to the commencement of the construction phase. Measures would be implemented to maintain public safety, the details of which are set out within the **Outline CEMP [EN010158/APP/7.2]**.	
Maintenance	EM_44, EM_75	Query who would be responsible for maintaining footpaths within the Proposed Development.	Should consent be granted, EDF power solutions UK (one of the companies which form the Applicant) is intended to build, operate, maintain and decommission the Proposed Development, including footpaths. This would be in accordance with and as secured by the **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8]** and **Outline Landscape and Ecology Management Plan [EN010158/APP/7.6]**.	N
New routes	EM_67	Comments that a local circular walking route should be created around more of the woodland sites in the	The woodland sites have been excluded from the Order Limits of the Proposed Development and the provision of routes outside the Order Limits is not possible. The majority of woodlands are designated as Ancient Woodland, Local Wildlife Sites or Sites of Special Scientific Interest, and as such the introduction of walking routes beyond those that are	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		area, linking in with the existing network.	already present would have the potential to harm the biodiversity of these woodlands.	
Permanence	EM_58	Comments that the proposed footpaths would not be permanent.	The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning. This is secured by the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]**.	N
Permissive path	EM_18	Comments that the permissive path behind Runts Wood is an important circular walk which has not been considered.	This permissive route is retained as part of the Proposed Development. It is identified on **ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3]** and this is secured by the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]**. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that up to moderate (significant) residual effects would remain for users of the permissive path.	N
Recreation	EM_18	Comments that a recreational area should be created on the airfield	This area is no longer within the Order Limits of the Proposed Development. Potential for the provision of a recreational area on the southern edge of Botolph Claydon was considered following feedback from	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		south of Botolph Claydon.	Phase One Consultation. However, it was considered that removing the closest fields to the village from the Order Limits altogether was preferred by the majority of respondents when considering the feedback as a whole.	
Technology				
Microclimate	EM_98, EM_109, EM_146, EM_101, EM_104, EM_114, EM_108, EM_116, EM_118, EM_16, EM_30, EM_31, EM_35, EM_41, EM_52, EM_140, EM_150, EM_90, EM_95, EM_100, EM_32	Comments that solar farms create a microclimate in the surrounding area.	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** assesses the impact of GHG emissions arising as a result of the Proposed Development on the climate in line with industry guidance. Microclimate impacts are not considered within the ES as it is anticipated that there would be negligible/no impact to local temperatures as a result of the Proposed Development.	N
Principle of development	EM_101, EM_30, EM_140	Comments on solar PV technology, including that it is not efficient, and the technology used would be outdated by the time the Proposed	The forecast for the increase in electricity demand for the UK is a significant and urgent matter, requiring immediate action to ensure a sustainable and affordable energy system in the long term. The increasing efficiency and reliability of renewable technologies including solar PV and BESS offers a	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		Development is operational.	home-grown and comparatively rapidly deployed way to deliver cost-effective energy generation for the UK. The exact solar PV technology selected for the Proposed Development, should consent be granted, would be the latest and most efficient technology available at the time of construction. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity while also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7]** sets out the reasoning for the Proposed Development, including its size and location.	
Procurement	EM_98, EM_112	Comments that the Applicant should use a British supplier of the components of the Proposed Development.	The Applicant is a Joint Venture, and formal procurement would commence only after development consent is secured. The Applicant includes EDF power solutions UK, which intends to build and operate the Proposed Development should consent be granted. EDF power solutions is committed to supporting local economies and fostering strong relationships with suppliers wherever possible. For every project, carefully evaluation of suppliers based on a range of criteria, including	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			quality, reliability, sustainability, and cost-effectiveness is undertaken. While local and national suppliers are favoured where feasible, as noted in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]**, it is also important to ensure that the components used meet the highest standards of performance and safety. In some cases, this could involve sourcing specialized components from international suppliers with proven expertise.	
Procurement		Comments expressing concern about ethical procurement of the components of the Proposed Development, including forced labour within the solar supply chain, unethical mining practices.	The Applicant recognises the increased risk of modern slavery in the solar energy supply chain, particularly due to the complexities associated with the manufacture of solar PV panels. As noted in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]**, these risks are taken seriously and a rigorous approach is applied to ensure all supply chain partners align with the Applicant's values and legal obligations, including compliance with the Modern Slavery Act 2015. The Applicant is a Joint Venture and formal procurement would commence only after development consent is secured. The Applicant includes EDF power solutions UK, which intends to build and operate the Proposed Development should	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			consent be granted. EDF power solutions UK is part of the wider EDF Group, which operates under robust and proven procurement policies developed through delivery of other solar PV and BESS projects. These policies and processes, described below, are directly applicable to the proposed development and provide a tested framework for managing ethical supply chain issues. **1. Modern Slavery Risk Evaluation in Operations and Supply Chains** EDF power solutions has stringent internal procedures for evaluating and mitigating the risk of modern slavery, both in its own operations and throughout its supply chain. These measures include: • **Supplier Onboarding:** All framework suppliers and contractors must demonstrate ongoing compliance with the Modern Slavery Act 2015 as a condition of engagement. This is assessed through a detailed anti-slavery questionnaire, supported by documentary evidence. • **Site Audits**: Compliance checks are conducted physically at supplier premises where necessary, especially for high-risk categories (for example PV Module, BESS Cells, Inverters).	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			• **Contractual Safeguards**: Contracts contain a clause that permits immediate termination in the event of non-compliance with anti-slavery requirements. These clauses also mandate compliance by subcontractors and enable EDF to audit all levels of the supply chain. • **Employee Vetting**: Direct employment is conducted in strict compliance with applicable national employment legislation, with additional screening to prevent forced labour or exploitation. **2. Sustainable Procurement and Due Diligence Process** EDF power solutions' sustainable procurement process provides a structured approach to identifying and mitigating modern slavery risks. This process comprises: • **Phase 1: Desktop Screening** Qualified suppliers complete a comprehensive Environmental and Social (E&S) questionnaire that addresses: o Prohibition of child and forced labour o Anti-discrimination and harassment policies	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)

- Freedom of association and collective bargaining
- Compliance with International Labour Organization (ILO) Conventions and UN Guiding Principles on Business and Human Rights
- Commitment to decent working conditions, fair wages, and working hours
- Freedom of movement for workers Responses are reviewed by EDF's Sustainability Department, and each supplier is assigned an E&S score which feeds into the overall qualification assessment (alongside quality and cost metrics).

- **Phase 2: Onsite Verification**
  High-risk or strategically significant suppliers undergo an onsite audit to verify the accuracy of responses given in Phase 1. This includes direct assessment of labour practices, worker accommodations, and subcontracting arrangements.
- **Contractual Clauses and Flow-Down Requirements**
  All contracts include an E&S clause requiring

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			compliance with environmental and social standards. Suppliers must cascade these obligations to their subcontractors and provide proof of compliance on request. EDF retains the right to audit the full supply chain, including subcontractors and production sites. **3. Certification and ESG Audits for Solar Panel Suppliers** Specifically for PV module suppliers, EDF conducts a multi-layered due diligence process, including: • **ESG Evaluation**: Suppliers undergo evaluation across four core ESG areas: 1. Environmental & Social Governance 2. Environmental Management 3. Social Management 4. Responsible Procurement Practices • **Production Site Audits**: For solar panels, site-level audits are undertaken to assess working conditions, traceability of raw materials (e.g., polysilicon), and adherence to international labour standards. • **Ongoing Monitoring**: Suppliers are subject to regular review by EDF's corporate audit team, with	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			support from regional teams with proximity to the manufacturing sites. This layered governance model ensures both global oversight and local engagement. All of the above measures are secured through the commitments set out in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]** and would be carried through into the detailed design and delivery stages. They would be embedded into the procurement strategy and contractual frameworks to ensure enforceability.	
Transport and access				
Edgcott	EM_57	Comment expressing concern about traffic impact on Edgcott.	No construction traffic would be routed through Edgcott. The use of access routes is strictly controlled by the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Failure to observe the access routing is a disciplinary matter that could result in construction traffic drivers being removed from Site.	N
Hedgerows	EM_14	Comments that hedgerows along Snake Lane would be affected and request for	The hedgerows along Snake Lane / Fidlers Field have been subject to surveys to assess the baseline value of the hedgerows. No significant impacts to hedgerows are predicted on Snake Lane / Fidlers Field, given equal length of hedgerow planting is	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
		information about how these would be replaced.	proposed to compensate for the length of hedgerow that is proposed to be removed following completion of works.	
HS2	EM_14	Comments that the new HS2 bridge may not be capable of taking construction vehicles.	Construction traffic accessing the Site from the south is based upon the criteria contained in The Road Vehicles (Construction & Use) Regulations 1986 which ensures that all vehicles are within standard weights and sizes. Any Abnormal Indivisible Loads are to be routed from the A421, via Winslow, using the National Highways agreed Heavy and High AIL access route to East Claydon Substation. This is detailed in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** and would be enforced in **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**	N
Impact on local roads	EM_92, EM_93, EM_106, EM_33, EM_47, EM_72, EM_78, EM_79, EM_86, EM_88, EM_99, EM_105, EM_109, EM_127, EM_130, EM_132, EM_143, EM_146,	Comment that local roads would be damaged by the Proposed Development.	A wear and tear agreement between the Applicant and Buckinghamshire County Council would be in place throughout construction to cover the cost of abnormal wear and tear on the road network between the A41 and the Site access junctions as a result of the Proposed Development during the construction phase.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_149, EM_38, EM_73, EM_74, EM_101, EM_102, EM_104, EM_107, EM_110, EM_113, EM_116, EM_118, EM_121, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_126, EM_09, EM_29, EM_30, EM_35, EM_41, EM_43, EM_44, EM_46, EM_48, EM_50, EM_52, EM_70, EM_76, EM_77, EM_139, EM_140, EM_141, EM_150, EM_144, EM_148, EM_152, EM_89, EM_90, EM_94, EM_95, EM_96, EM_87		The wear and tear agreement would address concerns about possible damage to the public road, verges and structures. It would be based upon condition surveys of the road to ensure that the condition of the road does not deteriorate solely because of the construction works for the Proposed Development. Where defects occur on the road network leading from the A41 to the Site access junctions, the Principal Contactor would maintain a stockpile of road repair material on Site to undertake repair works quickly and efficiently, when authorised by Buckinghamshire Council to undertake interventions. For further detailed information on the maintenance and wear and tear agreement please review **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Impact on local road network	EM_92, EM_93, EM_106, EM_57, EM_47, EM_78, EM_79, EM_80, EM_86, EM_88, EM_98, EM_99, EM_105, EM_109, EM_127, EM_130, EM_132, EM_143, EM_146, EM_149, EM_73, EM_101, EM_102, EM_104, EM_107, EM_110, EM_113, EM_116, EM_118, EM_119, EM_120, EM_121, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_126, EM_29, EM_31, EM_35, EM_36, EM_46, EM_48, EM_52, EM_56, EM_70, EM_76, EM_77, EM_139, EM_140, EM_141, EM_150,	There would be a negative impact on the local road network from construction traffic.	The road network proposed for use in the Proposed Development has been carefully examined and is considered suitable as a safe and efficient means of access and egress from the Proposed Development. Sections of the access route (A41 and Station Road) have been used for the more intensive HS2 traffic. Road capacity reviews for the access route are provided in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/15.1].** Wear and tear to the public road network as a result of construction traffic generated by the Proposed Development is addressed by a proposed agreement contained in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**. The effects on other road users are temporary in the construction period and have been mitigated as shown in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**. No significant effects are anticipated.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_144, EM_147, EM_148, EM_152, EM_155, EM_89, EM_90, EM_94, EM_95, EM_96, EM_100, EM_87			
Maintenance	EM_18	Query who would pay for road repairs and PRoW during construction.	Road repairs that are required on the public road network as a direct result of construction traffic generated by the Proposed Development would be covered by a Wear and Tear Agreement between Buckinghamshire County Council and the Applicant. This is detailed and secured in in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**. Other road repairs would be the responsibility of Buckinghamshire Council as local roads authority. PRoW repairs within the Site would be the responsibility of the Applicant. Repairs outside of the Site would be the responsibility of the existing authorities.	N
Road condition	EM_18	Comment expressing concern about damage to Granborough Road from HGVs.	Road repairs that are required on Granborough Road as a direct result of construction traffic generated by the Proposed Development would be covered by a Wear and Tear Agreement between Buckinghamshire County Council and the Applicant. This is detailed and	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			secured in in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**	
Routing	EM_58	Comment that traffic should be routed through Station Road, Quainton and Claydon Road.	Construction traffic has been routed outside of existing villages and towns as far as possible to minimise the effects of construction traffic on residents. Access routes would be strictly controlled by the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**.	N
Site access	EM_18	Comment that the proposed site access point is on a blind bend which is unsafe.	None of the access junctions are located on a blind bend and full junction visibility to the standards specified in the Design Manual for Roads and Bridges have been provided as noted in the junction drawings provided in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**.	N
Water				
General	EM_146, EM_107, EM_06, EM_30, EM_44, EM_46, EM_144, EM_152, EM_91, EM_95, EM_96	Comments expressing concerns about flood risk.	Flood risk has been a key consideration as part of the design of the Proposed Development. For example, where solar panels are proposed to be located in areas at a higher risk of flooding, these would be up to 4.5m in height. This would ensure that the electrical components are above the flood level (see ES Volume 3, Figure 3.1: Height Parameters	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			[EN010158/APP/6.3]). This is secured in the **Design Commitments [EN010158/APP/5.9]**. An appropriate freeboard above calculated climate change flood levels has also been assessed as part of the FRA, which is set out in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**. This includes the commitment for the height of the lower part of the solar PV panels to be no greater than 1.8m AGL (post-earthworks) within Flood Zones as set out on the **Works Plans [EN010158/APP/2.3]** and secured in the **Design Commitments [EN010158/APP/5.9].** A Sequential Approach to development has also been adopted, ensuring that infrastructure is not located in areas that are prone to flooding. This includes the commitment for the Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds to be located outside of Flood Zone 2 and 3 areas as secured in the **Design Commitments [EN010158/APP/5.9].** Further detail on the sequential test is set out in **Appendix 5 - Sequential and Exception Tests** of the **Planning Statement [EN010158/APP/5.7]**.	

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
Miscellaneous				
	EM_13, EM_17, EM_14, EM_33, EM_49, EM_72, EM_78, EM_80, EM_98, EM_99, EM_109, EM_127, EM_63, EM_101, EM_102, EM_104, EM_134, EM_117, EM_114, EM_108, EM_110, EM_118, EM_119, EM_120, EM_122, EM_133, EM_123, EM_125, EM_151, EM_157, EM_06, EM_23, EM_29, EM_30, EM_32, EM_35, EM_42, EM_43, EM_48, EM_50, EM_52, EM_56, EM_64, EM_68, EM_83, EM_85, EM_137, EM_138, EM_139, EM_150, EM_147, EM_94,	General statement of opposition against the Proposed Development	The Applicant is bringing forward the Proposed Development to meet an urgent national need for clean, secure sources of electricity. Further information on this is provided within the **Statement of Need [EN010158/APP/7.6]** submitted as part of the Application. Throughout the pre-application stage, the Applicant has sought feedback on its proposals from anyone with an interest in the Proposed Development to improve its proposals, irrespective of their overall opinion on the Proposed Development. This has included two phases of formal consultation and a targeted consultation, alongside a continuous programme of stakeholder engagement. The Applicant has had regard to all responses received to consultation in finalising its proposals, resulting in a number of changes being made to the Proposed Development. A summary of changes made due to feedback from consultation, along with how the Applicant has complied with legislation, guidance and advice notes in carrying out pre-application consultation are set out in the **Consultation Report [EN010149/APP/5.1]**.	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_95, EM_96, EM_100			
General	EM_41	Comments expressing concern about increased vandalism/potential for terrorism in the local area. Specific comments referenced need for more security to ensure local safety.	The Applicant takes matters of safety and security very seriously and appreciates feedback on this important topic. Should consent be granted, EDF power solutions UK (one of the companies which forms the Applicant) is intended to build, operate, maintain and decommission the Proposed Development. EDF power solutions UK is committed to ensuring the safety of the communities in which it operates. For every project, thorough risk assessments are conducted, alongside ongoing engagement with local authorities, law enforcement, and security experts to identify and mitigate potential risks. The Proposed Development would receive several security risk management threat assessments during its development, construction, operation and decommissioning phases. These would be conducted at minimum yearly but also as needed to respond to any newly identified threat to the safe and secure operation of the site. Information on security is provided in the **Outline Operational Environmental Management Plan**	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
			[EN010158/APP/7.3]. Should consent be granted, further detail of Site security measures would be provided in subsequent OEMP(s).	
Funding	EM_31	Comments expressing concern about the use of public money to fund the Proposed Development.	The Applicant is bringing forward the Proposed Development as a private venture and it would not be funded using government subsidies. A **Funding Statement [EN010158/APP/4.2]** has been submitted as part of the Application to demonstrate how the Applicant would fund the construction of the Proposed Development.	N
Profit	EM_63, EM_74, EM_134, EM_112, EM_06, EM_29, EM_30, EM_35, EM_42, EM_44, EM_50, EM_52, EM_56, EM_62, EM_77, EM_85, EM_140, EM_147, EM_90, EM_94, EM_100	Comments that the Applicant is motivated by profit.	The Applicant is bringing forward the Proposed Development to meet an urgent national need for clean, secure sources of electricity. Further information on this is provided within the **Statement of Need [EN010158/APP/7.6]** submitted as part of the Application.	N
	EM_16, EM_42, EM_85, EM_94,	Comments that the landowner would make a	The Applicant does not believe that assumptions about the motivations of private landowners are a	N

Topic	Respondents	Summary of comment	Applicant's response	Change (Y/N)
	EM_95, EM_96, EM_100	profit from the Proposed Development.	relevant consideration in providing feedback on the Proposed Development.	

Rosefield
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Application Document Ref: EN010158/APP/5.2
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