Rosefield Solar Farm

Environmental Statement

Volume 4
Appendix 5.3: Scoping Opinion Response Matrix

EN010158/APP/6.4
September 2025
Rosefield Energyfarm Ltd

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

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1. EIA Scoping Opinion Response Matrix – Planning Inspectorate

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Description of the Proposed Development				
2.1.1	Section 2.2	Flexibility	The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. Scoping Report paragraph 2.2.8 also states that the design parameters will be further developed during statutory consultation. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. The Inspectorate considers that early refinement of options will support a more robust assessment of likely	**ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** provides a full description of the Proposed Development, alongside the design, size, capacity, technology and locations of the different elements of the Proposed Development. Project parameters are detailed in full within **ES Volume 4, Appendix 3.1: Height Parameters [EN010158/APP/6.4]** and **Design Commitments [EN010158/APP/5.9]**. The spatial extent of each Work No. to inform assessment is shown on the **Works Plans [EN010158/APP/2.3]**. The approach to flexibility and the principal assumptions that have been made are included in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. The approach to flexibility and the reasonable worst-case scenario or assumptions/commitments that have

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			significant effects (LSE) and provide certainty to those likely to be affected. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters/commitments that have informed the assessment.	informed the assessment is outlined in each of the environmental factor chapters (**ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**), supported by expert judgement where appropriate. Engagement on the design parameters was undertaken during Phase One, Phase Two and Targeted Consultation. Further engagement related to each environmental factor is detailed in **ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**.
2.1.2	Section 2.3	Site boundary	The Scoping Report states that the redline boundary as shown in Appendix A represents the maximum land required for the full range of possible development options. The application site boundary indicated in Appendices C, F and H is different to that depicted in Appendix A. Scoping Report paragraph 6.2.4 states that the ecological surveys undertaken prior to 2023 were based on an earlier, reduced version of the site boundary excluding the cable route search area. The ES should clearly define the redline boundary/application site boundary within the project description section of the ES and ensure that it is consistently depicted on ES plans and figures. The ES should assess the LSE arising from all components of	The Order Limits in which the Proposed Development will be located within are shown in the **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]** and further illustrated in **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. **ES Volume 1, Chapters 2** and **3 [EN010158/APP/6.1]** clearly define the Order Limits. All ES chapters and figures are consistently present and assess the Order Limits. The ES assesses all components of the Proposed Development within the Order Limits as described in **ES Volume 1,**

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			the Proposed Development within the entire area of the application site boundary.	**Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and the **Works Plans [EN010158/APP/2.3]** visually set out the components of the Proposed Development of which the LSE have been assessed within the ES with **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** defining each component. The flexibility of the components is detailed within Section 6 of each Environment Factor Chapter (**ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**) and **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. The assessment is detailed within Section 10 of each Environment Factor Chapter (**ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**).
2.1.3	2.3.1	Site area	The size of the application site area described in the Scoping Report does not include the East Claydon National Grid (NG) substation on the basis it does not form part of the Proposed Development. However, as the substation would be located within the Order	The area located within the Order Limits comprises of approximately 675.05 hectares of land, as detailed in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1]**, which

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			Limits the ES should also identify the size of the site area including the land encompassing the substation.	includes the land where the National Grid East Claydon Substation is located.
2.1.4	2.3.40 and 2.3.41	Existing infrastructure	The Scoping Report identifies a number of existing infrastructure assets within the site, including pylons, overhead power lines, electric cables, water and sewer utilities. The assessment in the ES should take into account the location of existing infrastructure and identify any interactions between it and the Proposed Development. Any significant effects that are likely to occur should be assessed.	Existing infrastructure assets within the Site are illustrated on **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3]**. The location of assets have been taken into account in the design of the Proposed Development. National Grid overhead lines cross the Site in Parcel 3. The Applicant is mindful that these may change location when the Proposed Development is due to be constructed. It is therefore stated that the appropriate buffer distances, in line with National Grid guidance, will be applied at that time to the detailed design. This is detailed within the Protective Provisions which are secured within the **Draft DCO [EN010158/APP/3.1]**. The National Grid overhead lines are the only infrastructure that will potentially have an impact therefore, a high-level Electromagnetic Field Assessment has been undertaken which concludes there would be no significant effects (**ES Volume**

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				4, Appendix 5.6: EMF Assessment [EN010158/APP/6.4]). It has been confirmed that there will be no impacts on other utilities (**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**).
2.1.5	2.4.57	Onsite cabling	The Scoping Report states that deeper trenches or specialist trenchless techniques may be required for crossings of roads, environmental receptors, and other existing sensitive infrastructure. The ES should describe the likely routeing for the underground cabling, type of trenching methods, widths and depths of the cable trenches and the works required, including any dewatering of excavations.	The ES sets out the likely routeing for the underground cabling in **ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3]**, and the methods and dimensions of the trenches in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **ES Volume 3, Figure 3.6: Indicative Cable Trench Sections [EN010158/APP/6.3]**. The cable corridor crossings are listed out in the cabling and grid connection method statement which are provided in **Appendix 2: Cabling and Grid Connection Method Statement** of the **Outline CEMP [EN010158/APP/7.2]**. In addition the **Outline CEMP [EN010158/APP/7.2]** includes dewatering mitigation.

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2.1.6	2.4.69	Construction programme	The Scoping Report anticipates that the construction of the Proposed Development is to be completed in one phase and to last for approximately 18 to 24 months. Construction activities are set out in Scoping Report paragraph 2.4.71. The ES should include details of the likely commencement date, duration and location of the required construction activities. The ES should also determine how and where such activities will overlap and what plant and machinery is required. Details of any demolition works and the extent and location of such works should also be set out. Where uncertainty remains at the point of application, the assessments should be made on the basis of the worst-case scenario.	Section 3.15 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** sets out the anticipated construction programme including construction date, duration and location. **Table 3.20** of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** outlines the potential construction durations for each area of works across the different parts of the Proposed Development, showing a series of overlapping stages. For the purposes of assessment, it has been assumed that the Proposed Development's construction works, as detailed in Table 3.20, would be undertaken simultaneously across the 30-month period, assuming a peak construction year (i.e., the year during which the greatest level of construction activity would occur) of 2030, and that this peak level of construction activity occurs for the full 30 months. This construction assumption is considered to reflect a likely worst case for the environmental factor assessments (i.e., peak noise, dust, traffic volumes etc. occurring across the entire construction phase).

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				Assumptions around plant and machinery are included within **ES Volume 4, Appendix 13.2: Construction Noise Plant Tables and Results [EN010158/APP/6.4]**. This is an indicative plant list and used to inform the noise assessment. Demolition works will not be required for the construction of Rosefield Solar Farm.
2.1.7	2.4.76	Temporary construction compounds and access route	The Scoping Report states that the Proposed Development would require temporary construction compounds and access routes within the site, however, the exact location is yet to be determined. To ensure a robust assessment of LSE, the ES should provide details regarding the number, location and dimensions of construction compounds and access routes. Indicative timescales should be provided for all temporary works.	The details regarding the temporary construction compounds are provided in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** with the siting zones illustrated in **ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3].** Access routes within the Site are detailed within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and illustrated in **ES Volume 3, Figure 3.11: Indicative Location of Internal Access Tracks [EN010158/APP/6.3]**. Indicative timescales are set out in **Section 3.15** in **ES Volume 1, Chapter 3:**

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				Proposed Development Description [EN010158/APP/6.1]. **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and the **Works Plans [EN010158/APP/2.3]** visually set out the components of the Proposed Development of which the LSE have been assessed within the ES with **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** defining each component. The flexibility of the components is detailed within Section 6 of each Environment Factor Chapter (**ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**) and **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**.
2.1.8	2.4.77	Street works	The Scoping Report states that street works outside of the site may be required to facilitate construction access to the public highway. Such works should be included within the Order Limits. The ES should clearly identify the location of the works or where uncertainty remains, assess the worst-case scenario. An assessment should be provided where significant effects may occur.	Areas along the local road network that require work are included within the Order Limits as illustrated on **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]**. Within the ES, details of any street works are set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and potential impacts

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				are assessed in **ES Volume 2, Chapter 7: Biodiversity**, **Chapter 10: Landscape and Visual**, and **Chapter 15: Transport and Access [EN010158/APP/6.2]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**. The works are illustrated within the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.
2.1.9	2.4.91	Decommissioning	The ES should provide a description of the activities and works which are likely to be required during decommissioning of the Proposed Development, including the anticipated duration. Where significant effects are likely to occur as a result of decommissioning the Proposed Development these should be described and assessed in the ES. Any proposals for restoration of the site to agricultural or other use should also be described.	The Site would be reinstated in accordance with the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4]** which is submitted in support of the Development Consent Order Application. A description of the activities and works which are likely to be required during decommissioning, including the anticipated duration and restoration of the Site, is provided in **Section 3.18** of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** provides detail on the activities and works likely to be required during decommissioning and the timescales.

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				The effects of the decommissioning phase are often similar to, or of a lesser magnitude than, the effects generated during the construction phase and have been considered in the relevant sections of the **ES (ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**). However, there can be a high degree of uncertainty regarding decommissioning as engineering approaches and technologies will evolve over the operational life of the Proposed Development, and assumptions have therefore been made where appropriate.
2.1.10		Document referencing	The Appendices to the Scoping Report also contain appendices which are similarly numbered, therefore causing scope for confusion. It would aid the reader if the appendices to the ES are differently numbered/named so that they are clearly identifiable from cross-references in the ES.	The terminology for the appendices of the ES Appendices has been updated to refer to them as 'Annexes' to avoid confusion.
2.1.11	Section 5.9	Labelling of figures	There are a number of figures in Section 5.9 of the Scoping Report where reference is made in related text to features located on particular 'Parcels' on the application site although the parcels are not identified on the figures. It would aid the reader if the relevant parcels were identified on such figures contained in the ES. In addition, the depiction on Plate 5.3 of the	The Site comprises four parcels of land (Parcel 1, 1a, 2 and 3), the Interconnecting Cable Corridor, the Grid Connection Cable Corridor, the National Grid East Claydon Substation, and associated access. These parcels and cable corridors are shown on **ES Volume 3, Figure 1.2: Order Limits**

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			Water Framework Directive (WFD) Main River watercourses does not appear consistent with the description in paragraphs 5.9.8 and 5.9.14; a Main River is shown but not named in the Key (or referenced in the text) and the River Ray and its tributary are identified as Main Rivers in the text but not identified as such on the figure. 'Gubbinshole and Broadmoor ditch to Ray' does not appear to be shown on the figure (and is not referenced in the text) although it is listed in the Key. The Applicant should ensure that figures provided within the ES are correctly labelled and that the information depicted is consistent with information provided in the main text.	**[EN010158/APP/6.3]** and detailed in **ES Volume 1 Chapter 2: Location of the Proposed Development [EN010158/APP/6.1]**. The figures provided to support the ES all include the depiction of the relevant parcels to aid the reader (see **ES Volume 3 [EN010158/APP/6.3]**) with information depicted consistent with information provided in the main text. **ES Volume 3, Figure 16.1: Watercourses [EN010158/APP/6.3]** depicts the WFD Main River watercourses and other watercourses. The names of these watercourses are included on the figure if the watercourse crosses into the study area. This includes the River Ray and a River Ray Tributary.
EIA method and scope of assessment				
2.2.1	Chapter 2	Management plans	The Scoping Report refers to a number of management plans which will be provided with the DCO application documents: • Outline Construction Environmental Management Plan (oCEMP); • Outline Soils Management Plan;	Management plans are located within Part 7 of the DCO Application and are the securing mechanism for mitigation measures. These management plans include:

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			• Outline Construction Traffic Management Plan; • Travel Plan; • Framework Abnormal Load Transport Management Plan; • Outline Landscape and Ecology Management Plan (oLEMP); • Outline Operational Environmental Management Plan (oOEMP); • Outline Public Rights of Way Management Plan; and • Outline Decommissioning Environmental Management Plan (oDEMP). The draft management plans provided with the application should be sufficiently detailed to demonstrate how significant effects will be avoided or reduced and the ES should clearly explain how the implementation of these plans would be secured in the DCO.	• **Outline Construction Environmental Management Plan (CEMP) [EN010158/APP/7.2]**; • **Outline Soil Management Plan (SMP) [EN010158/APP/7.7]**; • **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**; • **Outline Travel Plan [EN010158/APP/7.5]** (embedded within the **Outline CTMP**); • Abnormal Load traffic management is embedded within the **Outline CTMP [EN010158/APP/7.5]**; • **Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6]**; • **Outline Operational Environmental Management Plan (OEMP) [EN010158/APP/7.3]**; • **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]**; and • **Outline DEMP [EN010158/APP/7.4]**.

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				The mechanism by which these management plans, the mitigation measures to avoid or reduce significant effects and monitoring measures are to be secured and implemented and the party responsible for their delivery is outlined within the **Design Commitments [EN010158/APP/5.9]**. These mitigation measures are also set out within the **ES Volume 1, Chapters 1-5 [EN010158/APP/6.1]** and **ES Volume 2, Chapters 6-17 [EN010158/APP/6.2]**.
2.2.2	2.4.62	Lighting	The Scoping Report states that the Rosefield Substation compound, Battery Energy Storage System (BESS) compound and Collector Compounds would include manually operated or sensor-activated lighting, in accordance with relevant standards, but would not be permanently lit. External lighting will be assessed in a lighting assessment which will detail measures that are proposed to minimise light spill and impacts to sensitive receptors. The Inspectorate is content with this approach, however the ES should include a detailed description of the construction and operational lighting design and the measures taken to avoid or minimise lighting impacts on human and ecological receptors, including	A detailed description of the construction and operational lighting design is located within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. The emergency exits may need to be permanently lit, however, these will be discrete and minimal and in compliance with health and safety standards. A lighting assessment has not been undertaken as no significant effects on lighting are anticipated and an assessment accounting for lighting has been considered in **ES Volume 2, Chapter 7: Biodiversity**

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			consideration of effects relating to intermittent lighting sources such as motion-activated security lighting.	**[EN011058/APP/6.2]** and **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. Mitigation measures to avoid or minimise lighting are detailed in and secured by the **Design Commitments [EN010158/APP/5.9], Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline LEMP [EN010158/APP/7.6]**. These include commitments for lighting to use directional fittings, face away from woodland and hedgerow boundaries and for no permanent (continuous) lighting for security purposes, except where necessary to take account of health and safety requirements at emergency exits. Detailed lighting design will be set and agreed with the relevant local planning authority at detailed design, as detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]** and the **Outline OEMP [EN010158/APP/7.3]**.
2.2.3	Section 4.4	Study areas	The ES should include figures depicting the study areas used for the assessments.	Each ES chapter includes an associated figure depicting the study area used for the assessment (**ES Volume 3 [EN010158/APP/6.3]**).

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2.2.4	Section 4.5	Baseline conditions	It is noted that a number of field surveys have been undertaken which have informed the Scoping Report, however some of the ecological surveys were not based on the current application site boundary. The Applicant should ensure that all surveys are up to date and cover as a minimum the entire area of the proposed Order Limits.	The ES is supported by a number of figures and reports which have informed the assessments. Figures and appendices can be found within **ES Volume 3 [EN010158/APP/6.3]** and **ES Volume 4 [EN010158/APP/6.4]**. All surveys are up to date and cover the entire area of the proposed Order Limits as a minimum with the exception of a section of the Interconnecting Cable Corridor that requires an ALC survey to confirm the assumed soil quality. Surveys will be undertaken post-submission of the DCO Application as per agreement with National England.
2.2.5	4.6.1	Future baseline	The ES should set out the assessment year of the future baseline and detail how the future baseline conditions are established. The Inspectorate notes that the HS2 and East West Rail projects are located near the application site and that construction works for each are ongoing (as set out in paragraph 6.1.5). The description of the future baseline in the ES should clearly set out the construction and operation timeline for these projects against the timeline for the Proposed Development.	The general EIA approach to the assessment year and future baseline is set out in **ES Volume 1, Chapter 5 Approach to the EIA [EN010158/APP/6.1]**. Each ES environmental factor chapter (**ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2]**) sets out the future baseline and how future baseline conditions are established. The consideration of cumulative effects with other projects is presented in **ES Volume 2,**

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			The Inspectorate notes that some assessments require projections to account for future change. The ES should detail the methodology used for the projections, including the relevant data sources used.	**Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. Other projects are not considered within the future baseline as they are not a 'natural' change from the baseline scenario. The Applicant has been unable to get a construction and operation timeline for the East West Rail or HS2 projects. However, the Applicant has assessed the Proposed Development against both of these projects within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. The cumulative effects assessment has included both construction and operation impacts, depending on if the environmental factor has that development scoped in.
2.2.6	Table 4-1	Mitigation	The ES should confirm where offset distances from sensitive features are proposed as mitigation how delivery of these commitments would be secured. Any offsets should be clearly shown on accompanying plans or drawings. The Inspectorate considers that for mitigation of this nature to be effective the offsets would need to be in place during construction, operation and decommissioning and be clearly marked so that no activities, storage of materials or vehicle movements are permitted within them.	Offset distances from sensitive features are detailed and secured within the **Outline LEMP [EN010158/APP/7.6]** and are shown on **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]**. Offset distances will be clearly marked by Heras fencing or similar during construction and decommissioning as stated and secured in the **Outline CEMP [EN010158/APP/7.2]** and **Outline DEMP**

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				[EN010158/APP/7.4]. Offsets during operations will be delineated by the deer fencing that encloses the Solar PV development and security fencing that encloses the large electrical infrastructure (**ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**).
2.2.7	Table 4-1	Mitigation	The ES should clearly identify any fields composed solely of Agricultural Land Classification (ALC) Grade 1, 2 and 3a land on accompanying plans or drawings. Details should be provided of how these fields could remain in arable production in parallel with the operation of the Proposed Development.	**ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3]** illustrates the different ALC Grades within the Order Limits including Best and Most Versatile (BMV) land. There is 10.2ha of land within the Order Limits that is identified as BMV land.
2.2.8	Appendix D	Methodology	The Scoping Report states that professional judgement would be used in the assessments to determine the level of significance for some aspects such as air quality, cultural heritage, landscape and visual, transport and access and population. Any use of professional judgement to assess significance should be fully justified within the ES, including an explanation of the criteria that the judgement has been based on.	Any use of professional judgement used in assessments within the ES Chapters has been fully justified and includes an explanation of the criteria that the judgement has been based on (**ES Volume 2 [EN010158/APP/6.2]**).

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2.2.9	Appendix D	Methodology	The Scoping Report outlines the approach to assigning significance but does not clearly explain what level of effect is determined to be significant in EIA terms for some of the aspects such as air quality, biodiversity, climate, land soils and groundwater, transport and access and population. The ES should clearly define for each of the aspects addressed in the ES what is considered to constitute an LSE.	The level of effects that are significant in EIA terms with respect to air quality, biodiversity, climate, land and groundwater, soils, transport and access and population are clearly defined in their respective ES chapters (**ES Volume 2, Chapters 6-16 [EN010158/APP/6.2]**).
2.2.10	Section 5.10	Transboundary	The Inspectorate notes that Section 5.10 of the Scoping Report addresses 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 Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that it is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area Member State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the	The Applicant is not aware of any new or materially different information that will alter the conclusion that due to the nature and location of the Proposed Development there would be no transboundary LSEs.

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			issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-andadvice/advice-notes/	
Environmental aspects to be scoped out				
2.3.1	Section 5.2	Glint and glare	The Applicant proposes to scope out glint and glare from the EIA and provide a detailed stand-alone glint and glare assessment in an appendix to the ES, which will inform the design development, landscape mitigation plan and relevant assessments in the ES, particularly the LVIA. A bespoke glint and glare model will be used to undertake a detailed geometric analysis for all receptors potentially affected by the Proposed Development. A description of any relevant proposed mitigation measures and safety considerations will be included within the Proposed Development description chapter of the ES. It is proposed that aviation receptors will be considered as	A full glint and glare technical assessment is provided in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** including a detailed description of the assessment methodology. A bespoke model has been used to assess potential glint and glare impacts on all relevant receptors to indicate the likely extent and distance of potential glint and glare.

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			sensitive receptors but will not include departing aircraft on the basis that as the aircraft nose would be pointing upwards the visibility of objects, such as panels, located on the ground will be reduced. The Applicant is referred to Buckinghamshire Council's (BC's) comments in their consultation response (contained in Appendix 2) in relation to the need to include Finmere Aerodrome as a receptor. The Inspectorate is content with the proposed approach and agrees that a standalone glint and glare chapter does not need to be included in the ES. The technical appendix to the ES must clearly explain the assessment methodology (with reference to appropriate modelling and predictive techniques, charts/ diagrams and visual representations such as GIS-based viewshed analyses) to indicate the likely extent and distance of potential glint and glare. Where professional judgement has been applied this should be identified.	Finmere Aerodrome has been included as a receptor in the assessment.
2.3.2	Section 5.3	Heat and radiation	The Scoping Report proposes to scope out an assessment of impacts from heat and radiation during construction, operation and decommissioning as no significant sources of heat and radiation are anticipated due to the scale and nature of the Proposed Development. The Inspectorate agrees that this matter may be	**ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** outlines sources of heat and how this has been considered in the site layout and design. This includes the spacing of BESS containers to avoid overheating, inclusion of Heating,

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			scoped out from further consideration on the basis that the ES clearly signposts any identified sources of heat and radiation and how this has been considered with respect to site selection, site layout and mitigation design.	Ventilation and Air Conditioning (HVAC) systems within each BESS unit and inclusion of a separation distance of 0.5m to 1m between cables within the trench to avoid overheating. There are no identified sources of radiation within the Proposed Development.
2.3.3	Section 5.4	Electric, magnetic and electromagnetic fields (EMF)	The Scoping Report seeks to scope out electric, magnetic and electromagnetic fields. The majority of the underground cables would have a maximum voltage up to and including 132 kilovolts (kV), which meets the 1998 guidelines published by the International Commission on Non–Ionizing Radiation Protection (ICNIRP). A 400kV underground cable would connect the proposed Rosefield substation to the National Grid East Claydon Substation. Potential areas considered suitable for the Rosefield Substation include fields within Parcel 3 of the application site, which is crossed by three 400kV overhead power lines. The 400kV underground cable is described as a "minimal" amount of cabling and it is explained that residential properties would be a minimum of 250m away from Rosefield Substation, to avoid the potential for any EMF effects on sensitive receptors. It is considered in the Scoping Report that there would be	Most of the underground cabling within the Site to facilitate the connection between the Solar PV modules, Balance of Solar System (BoSS), Satellite Collector Compound, BESS and Rosefield Substation would be up to 132kV, apart from the short section of 400kV underground cabling which would connect the Rosefield Substation to the National Grid East Claydon Substation. The location of the Grid Connection Corridor is presented in **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]**. The design of the Proposed Development has considered infrastructure constraints and design standards. The **Design Approach Document [EN010158/APP/5.8]** outlines how design has been embedded into the Proposed Development and considerations relevant to the location of the

ID	Ref	Description	Inspectorate's comment	Applicant's response
			no significant EMF impacts. On this basis and subject to the provision of technical reporting to demonstrate that relevant design standards have been met for all cabling the Inspectorate is content to scope out consideration of EMF. However, in-combination impacts with the overhead lines on human health should be considered and significant effects assessed where they are likely to occur.	400kV Grid Connection cable in relation to sensitive receptors. A standalone EMF study has been undertaken to ensure that no significant effects are likely and provide technical reporting (see **ES Volume 4, Appendix 5.6: High Level Electromagnetic Field Assessment [EN010158/APP/6.4]**). This sets out the proposed siting zone for the cabling and includes an assessment of EMF and in-combination impacts of which none are likely.
2.3.4	Section 5.5	Major accidents and disasters	The Scoping Report proposes to scope out major accidents and disasters on the basis that the construction, operation and decommissioning of the Proposed Development are not considered to give rise to any risk of major accidents or disasters that could affect existing or future receptors which are not already considered through proposed design mitigation and existing regulatory regimes. The risk of major accidents and disasters will be considered throughout the design process, including siting the potentially hazardous equipment, e.g. the BESS and grid infrastructure, at a suitable distance from sensitive receptors in accordance with BESS standards (UL9540). In relation to the vulnerability of the	Consideration of the risks associated with major accidents and disasters is included in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. Impacts of major accidents and disasters are considered within the **BESS Plume Assessment [EN010149/APP/7.13]**, **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**, **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, and **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. Any relevant mitigation measures are detailed in and

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			Proposed Development it is highlighted that the UK already has a structured framework of risk management legislation in place. Scoping Report Table 5-1 presents a list of possible major accidents and disasters that will require consideration, i.e. fire, flooding, aircraft disasters, rail accidents and plant disease. It is stated that these will be addressed in documents submitted with the DCO application: a Plume Assessment, Battery Safety Commitments management plan, Flood Risk Assessment (FRA), Glint and Glare Assessment, the landscaping design and the oLEMP, which will include proposed mitigation, as necessary. In relation to potential fire risk associated with the BESS a cooling system will form part of the BESS, designed to regulate temperatures to safe conditions to minimise the risk of fire. The Plume Assessment will assess the impact of a fire event within the BESS battery components and the Battery Safety Commitments management plan will address the potential safety risks and the relevant mitigation and management procedures. The mitigation should be secured in the DCO, with reference to the proposed Battery Safety Commitments management plan. The Inspectorate has considered the characteristics of the Proposed Development and agrees with the proposed approach to major accidents and disasters.	secured by the **Outline CEMP [EN010149/APP/7.2]**, **Outline OEMP [EN010149/APP/7.3]**, **Outline LEMP [EN010158/APP/7.6]**, and **Outline Battery Safety Management Plan [EN010158/APP/7.9]**. The siting of the BESS and Rosefield Substation are also subject to the parameter set out in the **Design Commitments [EN010158/APP/5.9]** and the **Design Approach Document [EN010158/APP/5.8]**.

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			However, the ES should clearly signpost where these impacts are assessed in other relevant chapters and other application documents and where any relevant mitigation measures are secured, if required.	
2.3.5	Section 5.6	Utilities	The Scoping Report proposes to scope out a utilities chapter from the ES. A utilities search identified several assets within the application site. Further consultation will be carried out with the relevant utility companies and advice sought regarding separation distances and methods of construction in close proximity to each utility to avoid any risk of impact during construction. This will inform the layout of the Proposed Development and be reported within the ES as embedded mitigation. The oCEMP will include additional mitigation measures to protect against interference with below-ground utilities during construction. The Inspectorate is content that a standalone ES utilities chapter is not required. However, the ES should set out the findings of the desk-based study and signpost to where any required mitigation measures are secured.	A desk-based study of existing utilities within the Order Limits has been undertaken and is presented in **Section 5.5** of **ES Volume 1 Chapter 5: Approach to the EIA [EN010158/APP/6.1]** and illustrated in **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3]**. Engagement has been undertaken with relevant utilities providers and the Applicant will seek to agree protective provisions with each utility owner, such that the DCO includes appropriate protections and restrictions on the Applicant's exercise of its powers, for the protection of utilities. Relevant mitigation measures are secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.
2.3.6	Section 5.7	Human health	The Scoping Report proposes to scope out a dedicated assessment of impacts to human health on the basis that it will be considered in other relevant ES chapters including Air Quality, Landscape and Visual,	Individual topic assessment within the ES, such as chapters on Air Quality, Landscape and Visual, Noise and Vibration, Traffic and Access and Population, and in the

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			Noise and Vibration, Traffic and Access and Population; and in the standalone glint and glare assessment. The Inspectorate is content with this approach, however the ES should clearly set out potential impacts to human health from the Proposed Development during construction, operation and decommissioning and cross-reference to where impacts are assessed within the ES; this may extend beyond the chapters proposed above. The Applicant's attention is drawn to the comments of BC (Appendix 2 of this Scoping Opinion) in relation to the approach to assessing potential impacts on human health.	standalone glint and glare assessment, inherently consider effects on health. It is recognised that these assessments are fragmented across the ES, and therefore a **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** has been appended to the ES which summarises explicitly how health has been considered, sets out where individual topic assessments within the ES have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. The **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]** takes Buckinghamshire Council's comments into consideration by ensuring that the statement is in line with 2022 IEMA guidance on the effective scoping of human health in EIA and determining significance, and focuses on significant residual adverse effects identified through the EIA process which could have an impact on human health at a population level and, if relevant,

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				a sub-population level (and not an individual level). Within the 'Environmental Effects and Health Pathways' section of the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]**, the significance of residual impacts is reported for each relevant topic area and assessment. For each health and wellbeing determinant/pathway, specific sensitive and vulnerable populations/groups are identified. The **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]** also summarises all of the likely significant (moderate and above) and minor significance in-combination and cumulative effects reported within the ES (including a consideration of the in-combination effects on PRoW users, which was not previously included within a single location in the ES) and provides contextual information on the overall consideration of mental health, wellbeing, health determinants and pathways as part of the planning application. No significant residual effects on human health have been

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				reported, though it is noted that in some cases there are significant residual topic-specific environmental effects that may influence determinants of health (landscape and visual effects). The **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]** sets out how proportionate and reasonably practicable mitigation has been considered to address potential effects on human health, both physical and mental.
2.3.7	Section 5.8	Material assets and waste	The Scoping Report proposes to include a description of the potential streams and volumes of construction and operational materials and waste within the Project Description chapter of the ES, in lieu of a standalone chapter. The indirect impacts associated with materials consumption and waste disposal, e.g. greenhouse gas emissions; water consumption; amenity impacts; ecological impacts, will be assessed "..elsewhere within the EIA". Table 5-2 presents what the Applicant considers would be the main impacts and effects of the Proposed Development; predicted to occur in the construction and decommissioning phases.	**ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4]** sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phase. The indirect impacts and emissions associated with materials consumption are primarily assessed in the GHG emission assessment detailed in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** which considers lifecycle greenhouse gas emissions of materials (embodied carbon),

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			The oCEMP submitted with the DCO application will set out how construction materials and waste would be managed onsite and there would be a requirement in the detailed CEMP to develop and implement a Site Waste Management Plan (SWMP) and Materials Management Plan (MMP) in advance of the construction works. It is not intended to remove significant quantities of excavated arisings from the site during construction. Where possible, they would be balanced through a cut and fill exercise to retain volumes onsite, however there may be a need to remove some soils for treatment or disposal if found to be contaminated and not practical to treat onsite. The ES should confirm the cut and fill balance. It is considered that there will be relatively little waste produced during the operational phase and the requirement for material assets will be limited to maintenance and replacement parts, as required. The ES should include an assessment of the likely impact of component replacement, e.g. batteries and panels, and outline what measures, if any, would be put in place to ensure that these components are able to be diverted from the waste chain. The ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced during the	off-site transportation, disposal of waste, and water consumption, among other emissions sources. **Section 8.8** of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** presents all assessed emissions sources aligned to the Royal Institute of Chartered Surveyors (2023) guidance. These indirect impacts have also been accounted for within **ES Volume 2, Chapter 13: Noise and Vibration** and **Chapter 15: Transport and Access [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 will be managed throughout the lifespan of the Proposed Development. The production of a Materials Management Plan is secured in the **Outline CEMP [EN010158/APP/7.2]**, and will be undertaken at detailed design. The proposed component replacement rates are outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and these have been incorporated into the assessments contained within the ES. Mitigation

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			construction and operational phases in line with Schedule 4 of the EIA Regulations. During decommissioning, the removal of any material assets and waste would be recycled where practicable or disposed of in accordance with good practice and market conditions at that time. An oDEMP will be submitted with the DCO application. The ES should assess the LSE from decommissioning waste to the extent possible at the time of application submission. As such, the Inspectorate does not agree that material assets and waste may be scoped out as a standalone ES chapter.	measures to ensure that materials are diverted from landfill and undertaken in line with the waste hierarchy are detailed in and secured by the **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**. It is not intended that significant quantities of excavated arisings from the Site during construction (there are currently no demolition works proposed, for example), operation (including maintenance) or decommissioning will be removed. There may, however, be a need to remove some soils from the Site for treatment or disposal, if found to be contaminated, as it is not practical to treat this on Site. However, this is unlikely to be required (refer to **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**). Soil arisings will be balanced through a cut and fill exercise to retain volumes on Site and there is anticipated to a zero cut and fill balance as outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1].** The detailed cut and fill balance for the Site will

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				be developed during detailed design; however, any soil arisings from the relevelling works will be repurposed on the Site. During decommissioning, any material assets and waste will be removed and recycled or disposed of in accordance with good practice and all legislative requirements in force at the time. If items can be recycled, this will be the first choice. The impacts of waste during the decommissioning phase will be managed and mitigated through measures detailed in and secured by the **Outline DEMP [EN010158/APP/7.4]** and **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**. A detailed SWMP will be produced in substantial accordance with the Outline SWMP which will be prepared as part of the DEMP prior to the decommissioning of the Proposed Development. The detailed DEMP will be discussed and agreed with the relevant planning authority at the time of decommissioning to ensure any impacts on

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				waste arising at this stage are considered and mitigated. The Applicant does not consider it possible to provide a meaningful quantitative assessment of decommissioning waste at this present time due to the uncertainty of future waste management measures and facilities. It is anticipated that further consideration of the potential waste at decommissioning will be a matter for the relevant consenting authority at the time and will be incorporated into the DEMP. During the operation (including maintenance) and decommissioning phases, the Applicant will 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 relevant mitigation to manage waste at decommissioning detailed in the **Outline Site Waste Management Plan**, which

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				forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]** and secured by the **Outline DEMP [EN010158/APP/7.4]**, it is anticipated that the majority of waste would be diverted from landfill and transported and managed in line with best practice and legislation at the time, therefore, there is not anticipated to be a significant adverse effect on landfill capacity. It is anticipated (and based on evidence of other markets) that private sector waste companies will develop waste recycling facilities to respond to market demands. Current solar panel waste generation is low, so there is little demand for facilities, hence the limited available capacity presently and it is anticipated that future markets will be created to respond to this future demand. Therefore, it is expected that facilities which reuse, recycle, or recover end of-life solar panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on those who place solar panels on the market to finance the costs of collection, treatment, recovery and

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				environmentally sound disposal at the end of their life; and the landfill tax and best practice (including the use of waste regulations) strongly incentivise reuse, recycling and recovery. In light of the above, the Applicant has not presented material assets and waste as a standalone chapter of **ES Volume 2 [EN010158/APP/6.2]**.
2.3.8	Section 5.9	Water - Flood risk	The Scoping Report proposes to scope out flood risk to and from the Proposed Development for all phases of the Development on the basis that it is unlikely to give rise to significant effects taking into account the design of the development and the mitigation measures proposed (examples of which are provided in paragraph 5.9.18), to be agreed with the Lead Local Flood Authority (LLFA), the Environment Agency (EA) and the relevant Internal Drainage Board (IDB) where appropriate. Mitigation would be secured through the oCEMP, the oOEMP and the oDEMP. An FRA will be submitted with the DCO application. Potential changes in flood risk resulting from the construction of the Proposed Development would be managed by principles documented in the oCEMP, which will include a construction surface water management plan. It is also anticipated that a	Flood risk has been subsequently scoped into the EIA and an assessment of flood risk is detailed in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. The Proposed Development has responded to updated flood risk mapping issued by the Environment Agency in 2025 both in terms of surface water and fluvial flood risk. Engagement with the Environment Agency led to agreement that major electrical infrastructure will be located outside the flood risk zones. It has been agreed with the Environment Agency that Solar PV modules can be located within Flood Zone 2 and 3 with the caveat that freeboard had to be above the maximum depth of flood water. The commitment for the Rosefield

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			temporary drainage system would be implemented during construction. During operation surface water drainage measures would be implemented and the existing drainage network at the application site may also be utilised. Paragraph 5.9.3 identifies that the application site is predominantly located within Flood Zone 1 (FZ1), with some areas of the site in FZs 2 and 3, described as particularly in the northeast of the site along the eastern boundary of Parcel 3 and in the south of the site, where FZ3 encroaches slightly onto the western fringe of Parcel 1a (shown on Plate 5.1). Paragraph 5.9.20 states that it is anticipated that any "significant areas of development" (not defined) would be located outside of the FZs. However, paragraph 5.9.31 identifies parts of Parcel 3 as a possible exception to this and paragraphs 2.4.34 and 2.4.40 state that Parcel 3 is a possible location for the proposed substation and BESS, respectively. It is stated that the potential impacts of any less vulnerable elements of the Proposed Development proposed to be located within FZs 2 and 3 will be assessed within the FRA. On the basis of the information provided and the lack of clarity about the potential locations of proposed infrastructure the Inspectorate is not in a position to scope this matter out at this stage. Accordingly, the ES should include an assessment of significant effects	Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters) and Collector Compounds to be located outside of Flood Zone 2 and 3 is secured by the **Design Commitments [EN010158/APP/5.9]** and **Works Plans [EN010158/APP/2.3]**. The Applicant therefore considers that the Proposed Development has passed the sequential test and the exception test (see **Planning Statement, Appendix 5: Sequential and Exception Tests [EN010158/APP/5.7]**. The drainage design and associated mitigation measures have been agreed with the Environment Agency, Buckinghamshire Council (as the Lead Local Flood Authority), and Buckingham and River Ouzel Internal Drainage Board. Further consultation details are set out in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. The Proposed Development's response to flood risk is set out in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** and in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**. An **Outline Drainage**

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			to/from flooding where they are likely to occur or evidence demonstrating agreement with the relevant consultation bodies and the absence of an LSE. The ES should assess impacts to groundwater during all phases of the Proposed Development where significant effects are likely to occur or otherwise explain why significant effects are not likely, with evidence of agreement to the approach from statutory consultation bodies. Cross-reference should be made to relevant information contained within the FRA, as appropriate. The Applicant's attention is drawn to the comments of the EA (Appendix 2 of this Scoping Opinion).	**Strategy [EN010158/APP/7.11]** has been submitted as part of the Development Consent Order Application, demonstrating that surface water runoff from the Proposed Development can be managed effectively. Groundwater receptors are assessed for all phases of the Proposed Development in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**.
2.3.9	Section 5.9	Water - quality	The Scoping Report proposes to scope out impacts on water quality for all phases of the Proposed Development on the basis of the proposed mitigation. During construction potential impacts from sedimentation and pollution would be controlled through the implementation of the CEMP and construction drainage management plan. During operation impacts would be controlled through the surface water drainage network which would incorporate sustainable drainage systems (SuDS) and pollution prevention measures, such as interceptors. Examples of proposed mitigation measures are provided in paragraph 5.9.18.	Water quality and Water Framework Directive watercourses were subsequently scoped into the EIA and are assessed within **ES Volume 2, Chapter 7: Biodiversity, ES Volume 2, Chapter 11: Land and Groundwater, and ES Chapter 16: Water [EN010158/APP/6.2]**. Mitigation measures to reduce impacts from sedimentation and pollution to watercourse are secured within the **Outline CEMP [EN010158/APP/7.2]** and **Outline Drainage Strategy [EN010158/APP/7.11]**.

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			The Inspectorate notes that impacts from herbicide and pesticide mobilisation have not been discussed in the Scoping Report; and that horizontal directional drilling (HDD) may be required but a breakout plan is not proposed. The Inspectorate does not consider enough evidence regarding the final design and control measures has been provided to scope impacts to water quality out during construction or decommissioning. The ES should identify relevant receptors and pathways of effect, the likely mitigation required to mitigate such effects and any monitoring required; this should include a drilling fluid breakout plan which should also be submitted with the application if trenchless techniques are employed. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters out at this stage. Accordingly, the ES should include an assessment of significant effects where they are likely to occur or evidence demonstrating agreement with the relevant consultation bodies and the absence of an LSE.	A HDD Fluid Breakout Plan has been produced and appended to the **Outline CEMP [EN010158/APP/7.2]**.
2.3.10	Section 5.9	Water - foul water, potable water, private water supplies,	The Scoping Report proposes to scope out foul water flows to the sewer network, demand for potable water, private water supplies, abstraction licences and discharge consents for all phases of the Proposed	Potential impacts to private water supplies and any abstraction and discharge consents are identified and appraised in **ES Volume 4, Appendix 11.1: Preliminary Risk**

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		abstraction licences and discharge consents	Development. Potential impacts to private water supplies and any abstraction and discharge consents will be identified and appraised in a Preliminary Risk Assessment (PRA). On the basis of the information provided in the Scoping Report and subject to the PRA being provided as an appendix to or clearly crossed-referenced from the ES the Inspectorate agrees that these matters may be scoped out. However, in the event that the PRA identifies any potential for significant effects these should be assessed or evidence provided in the ES demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	**Assessment [EN010158/APP/6.4]**. An assessment of potential effects relating to these receptors was undertaken in **ES Volume 2, Chapter 11: Land and Groundwater** and demonstrates that no LSEs are identified. Due to the nature of the site the foul flows in these phases of the project are likely to be small and as such a package treatment works may be a viable approach with ultimate discharge towards a drainage field or the local ditch/watercourse network (if required via a field drain). The drainage arrangement for permanent welfare facilities is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11]**. The site will require provision for domestic foul drainage. Due to rural nature of the site connection to foul sewer may not be feasible although this will be reviewed, as such the 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

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				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. Additionally, any localised effects on potable water and private water supplies (including abstraction and discharge licences) are considered negligible. Any required construction or decommissioning phase abstraction or discharge licences would be subject to obtaining the relevant permits from the Environment Agency. The Applicant and Anglian Water Services have engaged extensively throughout the pre-application period to discuss and put in place agreements for all interfaces as detailed in the **Draft Statement of Common Ground - Anglian Water Services Ltd [EN010158/APP/5.16]**. In any event, the Applicant has included standard water and sewerage protective provisions in the **Draft DCO [EN010158/APP/3.1]** submitted with the Application.

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Air Quality				
3.1.1	6.1.9	Dust and particulate matter emissions resulting from demolition works - construction	The Scoping Report states that there are no demolition works proposed during the construction phase. The Inspectorate agrees that this can be scoped out of further assessment during construction.	Noted. The Applicant can once again confirm that there are no demolition works proposed during the construction phase of the Proposed Development.
3.1.2	6.1.9	Dust and particulate matter emissions resulting from site activities - operation	The Inspectorate considers that due to the scale and nature of the Proposed Development operation is unlikely to give rise to significant air quality effects and agrees that this matter may be scoped out of further assessment. However, the ES project description should confirm that there are no emissions from operational plant that require further assessment.	Noted. The Applicant can once again confirm that there are no emissions from operational plant that require further assessment, as set out and confirmed in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1].** An emergency backup generator is proposed however this was screened out of further/detailed assessment see Table 6.3 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**).
3.1.3	6.1.9	Road traffic exhaust emissions - operation	The Scoping Report proposes to scope out this matter given that movement of vehicles during operation is expected to be minimal. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment. The ES must however provide information on the nature of vehicle movements during	Noted. **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** compares operational phase traffic counts with the EPUK-IAQM 2017 guidance screening criteria in the ES, confirming that the traffic projections fall below the relevant

ID	Ref	Description	Inspectorate's comment	Applicant's response
			the operational phase (alone and cumulatively) and confirm that these projections fall below the relevant thresholds set out in guidance.	thresholds, see Paragraph 6.8.12. Cumulative effects of traffic were assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** see Paragraphs 17.7.3 to 17.7.8.
3.1.4	6.1.9	Potential air quality impacts of a fire incident at the BESS Compound - operation	The Scoping Report proposes to scope out this matter given the unlikely event of a fire at the BESS compound. A Plume Assessment to assess the impact of a fire event within the BESS battery components and a Battery Safety Commitments management plan is proposed to be submitted with the DCO application. The Inspectorate agrees that this matter can be scoped out provided that cross-reference is made, as necessary, from the ES to relevant information contained within the Plume Assessment and Battery Safety Commitments management plan. The Applicant is referred to our comments on BESS fire risk in ID 2.3.4 above.	This has been noted, and cross references are included in the ES where applicable to the **BESS Plume Assessment [EN010149/APP/7.13]** and **Outline Battery Safety Management Plan [EN010158/APP/7.9]**.
3.1.5	6.1.11 and 6.1.12	Road traffic exhaust emissions assessment – construction and decommissioning	The Inspectorates notes that a screening level qualitative assessment will be undertaken with reference to Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance to confirm whether a detailed construction phase traffic emissions modelling assessment is required. Should it be considered that the modelling assessment is not required, the ES must provide up to	**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** compares construction and decommissioning phases traffic counts with the EPUK-IAQM 2017 guidance screening criteria, see Paragraph 6.8.7 to 6.8.11. This demonstrates that construction and decommissioning traffic projections fall below the relevant

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			date information on the anticipated construction programme and the predicted number of HGV movements to demonstrate that the relevant EPUK-IAQM thresholds are not exceeded on relevant links by the Proposed Development on its own or cumulatively with other proposals.	thresholds during the construction programme and therefore a detailed modelling and assessment of traffic emissions is not required. Cumulative effects of traffic were assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** see Paragraph 17.7.3 to 17.7.8.
Biodiversity				
3.2.1	6.2.9	For all phases - • Eight non-statutory designated sites within/adjacent to the site boundary: - Bernwood Biodiversity Opportunity Area (BOA); - Shrub Woods Local Wildlife Site (LWS); - Decoy pond Wood LWS - Romer Wood LWS;	The Inspectorate considers that there is insufficient evidence provided in the Scoping Report to scope out effects on these habitats and species for all phases of the Proposed Development for the following reasons: • the baseline surveys and desk-based reports used to inform the scope of the assessments do not cover the whole of the Proposed Development site boundary depicted in Scoping Report Appendix A; • insufficient consideration of potential impact pathways or use of the mitigation hierarchy; • details of the location and working methods for solar panel infrastructure, cable corridors, access routes and construction compounds are not yet defined so potential effects are not fully defined; • effects from habitat severance, habitat loss, disturbance or displacement and changes to drainage, lighting, fencing or recreational pressures are not	The Order Limits as now proposed have been surveyed to inform the EIA, including appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. In addition, the details of the working methods for solar panel infrastructure, cable corridors, access routes and construction compounds are also considered and impact pathways identified, following the mitigation hierarchy, in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].** The assessment of potential direct and indirect effects on the habitats and species for all phases as requested by the Inspectorate is presented in **ES Volume 2,**

ID	Ref	Description	Inspectorate's comment	Applicant's response
		- Runts Wood LWS; - Finemere Wildlife Trust Reserve (WTR); - Home Wood, Middle Claydon LWS; and - Balmore Wood LWS. • 14 non-designated sites within 2km of the site boundary • Ancient woodland adjacent to the site boundary • Other ancient woodland sites within 2km of the site boundary • Arable field margins • Lowland mixed deciduous woodland and other woodland • Mixed scrub and	considered for all habitats and species; • the Masterplan contained in Appendix B does not show where measures proposed to support the scoping out of effects, such as the provision of buffer zones, will be implemented within the site boundary; and • the scope of the assessments has not yet been agreed with relevant consultation bodies. The Inspectorate therefore does not agree that these habitats and species can be scoped out of the assessment for all phases of the Proposed Development. Specific comments in relation to some of these matters are identified below in IDs 3.2.3 to 3.2.7.	**Chapter 7: Biodiversity [EN010158/APP/6.2].** Full justification for scoping out any ecological receptors is provided where applicable. Site layout plans are presented in the ES to show how the following habitats are avoided by the Proposed Development, or where the scheme design cannot avoid loss of habitat how habitat loss will be mitigated for (see **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**): Detail regarding the proposed mitigation measures are presented in the **Outline LEMP [EN010158/APP/7.6]**and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**.

ID	Ref	Description	Inspectorate's comment	Applicant's response
		bramble scrub • Other neutral grassland • Modified grassland • Cereal and non-cereal crops • Arable (non-crop) plants • Hedgerows and hedgerow trees • Individual trees and lines of trees • Watercourses • Ponds • Invasive species • Invertebrates • Amphibians (including great crested newts (GCN)) • Reptiles • Non-ground nesting birds • Barn Owl • Red kite • Bats (roosting) • Otter		

ID	Ref	Description	Inspectorate's comment	Applicant's response
		• Water vole • Dormouse • Badger • Specific surveys for water vole, great crested newt and white clawed crayfish.		
3.2.2	6.2.9	Bernwood BOA - all phases	The Applicant proposes to scope out the Bernwood BOA on the basis that the area is avoided by the layout of the Proposed Development. The Inspectorate notes the comments from Natural England (NE) and BC that there is potential for changes to be made to the extent of some Sites of Special Scientific Interest (SSSIs) in this area and that there are nationally and regionally important populations of bats within this BOA. The Inspectorate considers that there is potential for significant effects to occur and that the Bernwood BOA and the potential effects on the coherence of the ecological network associated with it should be assessed as a receptor and scoped into the assessment.	The Bernwood BOA was included as a receptor within the assessment outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and mitigation has focused on ensuring maintenance of connectivity for habitats (the ecological network) across the Order Limits and into the wider countryside. We are aware of the proposed changes to the SSSI sites within proximity of the Proposed Development to include updating the citation features of the SSSI and the extent of the SSSI boundary. We have consulted with Natural England to discuss the potential impacts to the SSSI sites and inform appropriate mitigation measures to ensure the ecological network is not impacted negatively and this is reflected in

ID	Ref	Description	Inspectorate's comment	Applicant's response
				ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]. The potential impact on bat species is assessed in **ES Volume 2**, **Chapter 7: Biodiversity [EN010158/APP/6.2]**.
3.2.3	6.2.9	Arable (non-crop) plants - all phases	The Inspectorate agrees that given there is no recorded presence of this habitat type within Parcels 1, 1a, 2 and 3, that this matter can be scoped out of the assessment for those land parcels. However, for the reasons given in Scoping Opinion ID 3.2.1, the presence and value of arable (non-crop) plants has not yet been determined for the remainder of the application site and the Inspectorate does not agree that it can be scoped out of the assessment of those areas at this stage.	This assessment with regards arable weeds is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Targeted surveys for arable (non-crop) plants have been undertaken within areas of the Site that contain habitats suitable to support arable (non-crop) plants and no scarce or notable arable weeds were identified. Only areas of arable habitat directly affected by the Proposed Development have been surveyed. In areas not directly affected there will be no impacts on arable plants (non-crop).
3.2.4	6.2.9	Invasive species - all phases	The Inspectorate notes that no invasive species have been identified within Parcels 1, 1a, 2 and 3. Provided the oCEMP and oDEMP contain appropriate measures through an invasive species method statement containing measures for identification and control of any invasive species that are encountered unexpectedly, the Inspectorate agrees that significant	A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**).

ID	Ref	Description	Inspectorate's comment	Applicant's response
			effects are unlikely to occur and that this matter can be scoped out of the assessment for those land parcels. However, for the reasons given in Scoping Opinion ID 3.2.1, the presence of invasive species has not yet been determined for the remainder of the site and the Inspectorate does not agree that it can be scoped out of the assessment of those areas at this stage.	No invasive species were identified during the surveys and invasive species have not been identified within the order limits and have therefore been scoped out of the assessment. However, the **Outline CEMP [EN010158/APP/7.2]** and **Outline DEMP [EN010158/APP/7.2]** identify the requirement for an invasive species method statement and biosecurity protocol containing measures for identification and control in the event that invasive species, being brought to site by construction traffic.
3.2.5	6.2.9	Amphibians (including GCN) - all phases	The Applicant states that the effects of the Proposed Development on GCN are likely to be mitigated through a licence obtained as part of NE's District Level Licensing (DLL) scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be	GCN have been scoped in to the assessment. The Proposed Development site boundary sits within red, amber and green risk zones for GCN for Buckinghamshire. Nature Space and Natural England have been consulted. Works with the potential to affect GCN would be carried out either under the Buckinghamshire District Level Licensing Scheme through NatureSpace Partnership or under a European Protected Species licence from Natural England. The licensable works would encompass clearance, and construction works required within the intermediate and distant habitat

ID	Ref	Description	Inspectorate's comment	Applicant's response
			documented in an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impacts on GCN and any appropriate compensation required. Given the current limited knowledge of the location of GCN and this potential mitigation the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.	zones of ponds (likely up to 250m) within the Order Limits (see **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**).
3.2.6	6.2.9	Otter - all phases	The Inspectorate notes that presence of otter has been identified during the Applicant's site surveys and that details of the cable corridor routes, which could include watercourse crossings, have not yet been confirmed. Therefore, the Inspectorate does not agree that this matter may be scoped out of the assessment for all phases of the Proposed Development. The assessment in the ES should be supported by appropriate field surveys for otter of the entire area within the site boundary.	Otter have been scoped into the assessment, as reported in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** , with surveys undertaken in inform the assessment presented in **ES Volume 4, Appendix 7.8: Otter and Water Vole Survey Report [EN010158/APP/6.4]**.Targeted surveys for otter and water vole have been undertaken within the Order Limits on watercourse and waterbodies that were assessed as suitable to support otter and water vole. Presence of otter, which are now widespread across the UK, does not necessarily mean an impact will occur. Surveys are targeted where a potential

ID	Ref	Description	Inspectorate's comment	Applicant's response
				impact is likely, and areas of watercourse outside of the development footprint and a sufficient distance that disturbance is unlikely to occur have not been surveyed.
3.2.7	6.2.9	Badger - all phases	The Scoping Report concludes that an oCEMP and oDEMP would contain measures to protect badgers from the Proposed Development. The Inspectorate considers that these matters cannot be scoped out of further assessment. This is on the grounds that at present no details have been provided on what the draft EMPs would contain. In addition, there is no indication on the Concept Masterplan contained in Appendix B of where buffers and other protection measures would be. The Inspectorate also considers that there is potential for significant effects on badgers to occur during operation from the installation of fencing and lighting and that no details have been provided to demonstrate how the Proposed Development design would address these matters. As such, effects on badger cannot be scoped out of the assessment for the operational phase at this stage.	Badger have been scoped into the assessment as reported in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, with surveys undertaken in inform the assessment in 2022 (**ES Volume 4, Confidential Appendix 7.6: Badger Survey Report 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Confidential Appendix 7.15: Badger Survey Report 2025 [EN010158/APP/6.4]**). Fencing will not be buried, and natural low points will give sufficient clearance to allow badgers to pass under fences enabling continued access to forage under the array. At construction stage additional gaps suitable for badgers will be constructed on main badger paths if required. There will be no night-time working during the construction phase and any security lighting during operation will be infra-red and on

ID	Ref	Description	Inspectorate's comment	Applicant's response
				demand, therefore no lighting impacts are envisaged. Further details of proposed mitigation measures for badgers are presented in the **Outline CEMP [EN010158/APP/7.2]**.
3.2.8	N/A	Baseline surveys for bats	The Inspectorate notes that further bat roost surveys are proposed for 2023 and 2024, but no reference is made to other forms of bat survey being planned. The Inspectorate notes that the location of the Proposed Development supports populations of numerous bat species, particularly Bechstein's bats, and that this feature is under consideration for further SSSI designation by NE. The ES should identify how the land affected by the Proposed Development is currently being used by bats for foraging and commuting in order to inform the assessment. This should consider how the assessment of effects takes account of the characteristics of the different species of bats present. The Applicant should seek to agree the approach and study area for bat surveys and assessment of effects with the relevant consultation bodies. This should consider the need for wider forms of bat survey in addition to roost and bat activity surveys and should take account of any species-specific survey requirements.	The level of survey effort and scope for bats has been agreed with Natural England and bats have been scoped into the assessment. We are aware of the proposed changes to the SSSI sites within proximity of the Proposed Development to include updating the citation features of the SSSI and the extent of the SSSI boundary. We have consulted with Natural England to discuss the potential impacts to the SSSI sites and inform appropriate mitigation measures to ensure the ecological network is not impacted negatively and this is reflected in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The potential impact on bat species, including Bechstein's bats, which includes a detailed assessment of how they are using the Order Limits for roosting and foraging is

ID	Ref	Description	Inspectorate's comment	Applicant's response
				assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].**
3.2.9	6.2.1	Consultation approach	The ES should report the outcome of discussions with consultation bodies and demonstrate how this has influenced the scope of the design and the biodiversity assessment. Consideration should also be given to whether other local interest groups exist that should be included in the biodiversity technical consultation. The Applicant is directed to the BC response for suggested additional biodiversity consultees.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **Appendices A4, J1, J2** and **K3** of the **Consultation Report Appendices [EN010158/APP/5.2]**includes details of all technical consultation that has been undertaken and how this has influenced the final design of the Proposed Development. The Applicant confirms they have consulted with the following additional consultees suggested by BC: Buckinghamshire and Milton Keynes Environmental Record Centre, Environment Agency, NatureSpace (re. Great Crested Newts), HS2 and local butterfly experts.
3.2.10	6.2.1	Assessment of SSSIs	The ES should include an assessment of the direct and indirect effects of the Proposed Development on SSSIs and their features and identify appropriate mitigation measures to avoid, minimise or reduce any potential adverse significant effects. This should include consideration of the ecological network with other woodland blocks. Potential effects from habitat fragmentation and from loss of supporting habitat should therefore be scoped into the assessment for all SSSIs identified within Scoping Report paragraph	The assessment of potential direct and indirect effects on all SSSIs identified within the scoping report is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The assessment of impacts to SSSIs has informed the location and type of mitigation incorporated within the Proposed Development to avoid impacts to SSSIs and maintain ecological

ID	Ref	Description	Inspectorate's comment	Applicant's response
			6.2.8 unless otherwise agreed with relevant consultation bodies.	functionality and connectivity with links to the wider landscape.
3.2.11	Appendix B	Masterplan	The Inspectorate notes the potential for an area of ecological mitigation/enhancement in Parcel 1 (marked orange on the Masterplan) to be surrounded by potential solar development. The ES should demonstrate how ecological functionality, and connectivity has informed the selection of mitigation areas as being suitable for biodiversity mitigation and take opportunities to consider their location to maximise the benefits and ecological functionality.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses impacts to ecological receptors. This has informed the location and type of mitigation incorporated within the Proposed Development to avoid impacts and maintain ecological functionality and connectivity with links to the wider landscape. The ecological assessment details how mitigation has specifically addressed maintenance of ecological connectivity.
3.2.12	Appendix F-2	Mitigation	Scoping Report Appendix F-2 identifies several potential mitigation measures to address potential significant effects, e.g. suggested habitat mitigation for overwintering birds. However, it is not clear where or how these recommendations have been used to inform the developing design. The ES should clearly identify the mitigation measures and explain how these have been used to inform the developing design.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses impacts to ecological receptors including wintering and breeding birds. This has informed the location and type of mitigation incorporated within the Proposed Development to avoid impacts and maintain ecological functionality and connectivity with links to the wider landscape. The ES demonstrates how the mitigation hierarchy has been followed and how the design on the Proposed Development has been influenced to ensure appropriate mitigation

ID	Ref	Description	Inspectorate's comment	Applicant's response
				measures are embedded into the scheme design.
3.2.13	N/A	Assessment of ancient woodland and veteran/ancient trees	The ES should consider the potential for areas of nationally important ancient woodland to be present within designated sites that are valued at lower than national importance to ensure that an appropriate value is assigned to these habitats. The Inspectorate notes that several Target Notes in the Preliminary Ecological Appraisal (PEA) (Scoping Report Appendix F) identify the presence of standard trees within hedgerows and woodlands but do not indicate whether they have potential to be veteran or ancient trees. The ES should be supported by appropriate baseline data, including field survey, to identify the presence and condition of existing veteran and ancient trees, including hedgerow trees. Effects on ancient and veteran trees should be addressed in the ES, where there is potential for significant effects to occur. The approach to survey and assessment should be agreed with the relevant consultation bodies. The Inspectorate directs the Applicant to NE's response (in Appendix 2 of this Opinion) which refers to its standing advice and provides links to existing inventories for ancient and veteran trees.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** identifies the location of and recognises the importance of all woodland blocks including ancient woodland. The embedded design principles ensure the retention and protection of all woodland areas and appropriate setbacks from woodland blocks incorporated within the embedded design. The arboriculture survey was carried out in accordance with the British Standard that was current at the time of survey (BS5837:2012 Trees in relation to design, demolition and construction) as per council requirements and was carried out prior to design of the site. The arboricultural data tables and associated plans highlight woodlands and their status (see **ES Volume 4, Appendix 7.13: Stage 1 Arboricultural Report 2025 [EN010158/APP/6.4]**). Individual trees were recorded where they did not form cohesive groups and where assessed appropriately and categorised accordingly where there were veteran

ID	Ref	Description	Inspectorate's comment	Applicant's response
				features present, no ancient trees were recorded on site. This included an age categorisation, the BS5837 sub categorisation, comments regarding veteran features within the survey data and a separate section within both of arboricultural reports listing which trees were deemed as veteran. A separate root protection area (buffer) was also applied to veteran trees, as per standing advice from NE, differentiating them on plan. The Stage 2 arboricultural report has listed potential impacts to all trees, including veteran trees. Veteran trees were identified and guidance from the Ancient Tree Forum publication: Ancient and other veteran trees (Lonsdale 2013) was followed to help identify trees worthy of inclusion into veteran status. The methodology is detailed within both arboricultural reports, commentary and tables have been provided also indicating which trees have been classed as veteran (see **ES Volume 4, Appendix 7.13: Stage 1 Arboricultural Report 2025 [EN010158/APP/6.4]**). The magic maps data confined presence of Ancient Semi-Natural Woodlands but did

ID	Ref	Description	Inspectorate's comment	Applicant's response
				not identify any individual veteran or ancient trees. The ancient forum tree inventory only highlights one tree as being veteran but this had been removed many years prior to survey and the ATF inventory comments also note that it is just a stump. It is also noted that the ancient inventory is not a particularly robust data set given that many trees can be added by lay persons, and so there are some trees present on the inventory which, if the guidance followed from the ATF publication, would not necessarily be deemed as being veteran or ancient. The design of the Proposed Development has ensured the retention of all ancient and veteran trees with appropriate buffers from these trees from all infrastructure in line with Forestry Commission and Natural England guidance. The **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]**, **Outline LEMP [EN010158/APP/7.6]** and **Outline DEMP [EN010158/APP/7.4]** set out the control measures that will be implemented to protect individual ancient and veteran trees including demarcation fencing to prevent

ID	Ref	Description	Inspectorate's comment	Applicant's response
				construction activity in proximity to ancient and veteran trees. The majority of hedgerows would be protected from construction works. There will 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. There will be a minimum 10m offset from the fence line to all other existing hedgerows. However, a number of hedgerows would need to be 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. Details of lengths of hedgerow removal proposed is shown in the **Outline LEMP, Appendix 3: Vegetation Removal Parameters [EN010158/APP/7.6]**. New hedgerow planting will be implemented across the Site. Measures to minimise the impact of construction activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2], Outline SMP**

ID	Ref	Description	Inspectorate's comment	Applicant's response
				[EN010158/APP/7.7] and **Outline LEMP [EN010158/APP/7.6]**. 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 will 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]**).
3.2.14	N/A	Field survey extent	The Inspectorate notes that the site boundary presented in Scoping Report Appendix A differs from the site boundary considered during earlier desk and field-based surveys reported within the ecological appendices in Appendix F, including the most recent PEA (2023). The Inspectorate considers that the ES should be informed by a programme of appropriate field surveys for the area within the Proposed Development's zone of influence. This is expected to include the whole site. A single PEA should also be prepared for the ES that includes updated desk-based records for the whole extent of the site boundary. The ES should include habitat surveys which cover the whole site boundary for the Proposed Development. The approaches should be agreed with the relevant consultation bodies as far as possible and reported	The Order Limits as now proposed have been surveyed fully to inform the EIA, including appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. A single PEA has been prepared covering the entirety of the Order Limits which is presented in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4].**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			within the ES. Where possible, a set of consolidated survey reports should then be appended to the ES.	
3.2.15	6.2.11	Guidance	The biodiversity assessment in the ES should be prepared with reference to the Chartered Institute of Ecology and Environmental Management's 2022 'Guidelines for Ecological Impact Assessment (EcIA).	The biodiversity assessment in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken in line with the latest version of this guidance. i.e. the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024).
3.2.16	N/A	Surveys - terrestrial invertebrates	The Inspectorate notes that recommendations for further terrestrial invertebrate surveys were included in the 2021 PEA in Appendix F-1. The Inspectorate considers therefore the baseline within the ES should be supported by appropriate field surveys, including specific surveys for terrestrial invertebrates, where suitable habitats are identified. The Inspectorate also directs the Applicant to BC's comments (contained in Appendix 2 of this Opinion) in relation to establishing the potential for lepidoptera and glow worm. The approach to field survey should be agreed where possible with the relevant consultation bodies.	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]** and **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 Blackthorn, the food source for

ID	Ref	Description	Inspectorate's comment	Applicant's response
				black and brown hairstreak caterpillar, a species included as a SSSI citation feature, was recorded abundantly across the Site within hedgerows and woodland areas and therefore presence is assumed without the need for further survey. Areas of woodland that support Blackthorn within the Site boundary will be retained entirely, whilst hedgerows that support Blackthorn will be mostly retained in their entirety, although some removal is required to facilitate access or underground cabling. There is not expected to be an overall loss of suitable habitat for these species as hedgerows will 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]**). Habitat suitable to support glow worm within the site boundary such as hedgerows and

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				arable field margins will 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.
3.2.17	2.3.7	Overlap with HS2 mitigation	The Scoping Report notes that Parcels 1 and 1a of the Proposed Development overlap with proposed mitigation planting for HS2. No details of the specific nature of the HS2 planting nor a timetable for its implementation are provided. The Inspectorate considers that the ES should therefore describe the scale and extent of the mitigation planting, including where and when it will be introduced into the Proposed Development, making use where possible of figures and maps. The ES should then identify whether this planting would affect the future baseline (including creating new biodiversity receptors). An assessment should be provided where significant effects are likely to occur.	The Applicant has engaged with HS2 to ensure that the Proposed Development does not impact their mitigation planting, maintenance and any future proposals in this area. Parcel 1 and Parcel 1a have considered this mitigation planting in the design development and perimeter fencing surrounding the Solar PV development will be offset at least 20m from all other existing woodlands, including HS2 planting as secured in the **Design Commitments [EN010158/APP/5.9]**. The mitigation planting proposed by the applicant is outlined in the **Outline LEMP [EN010158/APP/7.6].** A cumulative assessment considering the cumulative effects of the Proposed Development in combination with HS2 is

ID	Ref	Description	Inspectorate's comment	Applicant's response
				detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN101058/APP/6.2].**
3.2.18	N/A	Impact on local enhancement projects	The Inspectorate notes that the Proposed Development potentially affects the Freshwater Habitats Trust's proposals for flood and biodiversity enhancements that also lie within the Bernwood BOA. The ES should demonstrate how the design of the Proposed Development has taken account of the conservation objectives of these projects, and where there is potential for significant effects to occur, the approach to mitigation.	Bernwood Biodiversity Opportunity Area (BOA) is a large area, and the Proposed Development is located at its very northern tip outside of the main river floodplain. No significant freshwater or flood plain habitats have been identified in surveys to date and therefore the potential for impacts upon the Freshwater Habitats Trust enhancements is considered unlikely. The Trust has been consulted to identify any potential interface and bring forward proposals that complement its flood and biodiversity enhancement measures where applicable. This has included setbacks from all watercourses, ponds and ditches, along with the creation and restoration of defunct ponds across the Site. In addition to the above the habitat creation and enhancement measures proposed by the Applicant will support a number of the wider BOA objectives inkling pond creation and restoration, hedgerow enhancement and species grassland creation.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.2.19	N/A	Lighting effects on bats during operation	The Scoping Report describes that directional and on demand lighting would reduce potential effects on bats during construction and decommissioning. However, the Scoping Report does not explain what if any lighting (e.g. for security) would be required during operation. The ES should assess the effects of lighting disturbance on bats and other nocturnal species for all phases of the Proposed Development.	The ES has assessed the effects of lighting on bats and other nocturnal ecological receptors within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].**
3.2.20	N/A	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.	Any records of sensitive or vulnerable ecological features including those legally protected are included in confidential parts of the Development Consent Order Application documents and will not be publicly available but in a confidential annex. Justification, where required, is provided in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.
3.2.21	Table 4-2	Water-dependent designated sites	The Scoping Report identifies 12 waterbodies within 500m of the site and aquatic habitats within the site that could be water-dependent. The ES should assess the potential effects of the Proposed Development on	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the potential direct and indirect impacts to all waterbodies within the Site and those

ID	Ref	Description	Inspectorate's comment	Applicant's response
			such sites where there is potential for changes in drainage patterns to give rise to a LSE on these sites and habitats.	located within 500m of the boundary, with cross-reference to **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** which concludes there are no proposals to increase drainage of the Site, with no significant effects to hydrology regime for either surface or groundwater predicted.
Climate				
3.3.1	6.3.9	Climate resilience - all phases	The Applicant proposes to scope out consideration of climate resilience on the basis of solar panels having an embedded resilience to high heat and wind speeds and the low risk of flooding to the site. Significant effects associated with these matters are not anticipated and the Inspectorate agrees that climate resilience may be scoped out in relation to the solar panels as they are unlikely to be susceptible to impacts from temperature change, sea level rise, precipitation change and wind. Nevertheless, the ES should demonstrate how the Proposed Development has been designed to be resilient to climate change. This should include a description of the measures that have been embedded in the design to enable climate resilience during construction, operation and decommissioning.	**ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4]** details how the Proposed Development has been designed to be resilient to climate change, with regards to construction, operation and decommissioning. The embedded mitigation measures relevant to climate change resilience and the benefits they provide are outlined in Section 2.2. Additional mitigation measures are outlined in Section 2.5 and assigned against the specific receptor and effect they are applicable for in tables 9, 10, and 11. Impacts including fluvial flood risk, tidal flood risk, pluvial flood risk, groundwater flood risk, sewer flood risk, and reservoir flood risk (among others) are considered in

ID	Ref	Description	Inspectorate's comment	Applicant's response
			The Scoping Report does not however consider climate resilience in relation to other elements of the Proposed Development such as the proposed substation, cable corridors, BESS and highways access. The climate resilience of these elements should therefore be considered within the ES.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4].** Additional information on how the Proposed Development has been designed to be resilient to climate change can be found in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1],** paragraph 3.4.21.
3.3.2	6.3.9	In-combination impact assessment - all phases	The Applicant proposed to scope out an in-combination climate change assessment on the basis that receptors relevant to other aspect assessments are unlikely to be affected by the combination of future climate change and the Proposed Development. The Scoping Report also states that no significant surface or groundwater impacts are expected from precipitation changes as the Proposed Development will not significantly affect flow of precipitation to ground. The Inspectorate agrees that the Proposed Development is unlikely to result in or be susceptible to impacts from temperature change, sea level rise, precipitation change, and wind. Significant effects associated with these matters are not anticipated and an in-combination assessment can be scoped out from the ES.	This has been noted.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.3.3	N/A	Baseline	The Inspectorate notes a discrepancy between the information on FZs provided within the Scoping Report Climate Change chapter, which suggests that the entire application site lies within FZ1; and paragraphs 2.3.14 and 5.9.3, which state that parts of the site lie within FZs 2 and 3. Care should be taken to ensure that the information provided in the ES on flood risk is consistent throughout the ES and accurately identifies the flood risk across the site.	The information presented in the ES is consistent throughout and accurately identifies flood risk across the Site. The latest Environment Agency published Flood Zone map (2025) is presented in **ES Volume 3, Figure 16.2: Environment Agency Flood Zones [EN010158/APP.6.3].**
3.3.4	6.3.3	Data	The Scoping Report states that the ES will consider how the Proposed Development would enable BC to meet its net zero target by 2050. The assessment should set out how the Proposed Development will contribute to this target.	The Proposed Development would assist BC in meeting its net zero target through the generation of low carbon electricity. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** paragraph 8.10.2 shows the approximate lifetime energy generation of the Proposed Development, as well as the net GHG savings compared against equivalent gas-fired electricity generation, set against the context of BC net zero targets. The GHG intensity of the Proposed Development compared to other energy generation technologies is also displayed in Table 17 in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2].**

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.3.5	6.3.7	Whole life greenhouse gas (GHG) assessment	The ES should include a whole life GHG assessment showing construction, operational and decommissioning GHG impacts and an explanation of the steps that have been taken at each stage to reduce emissions.	A whole life GHG assessment showing construction, operational and decommissioning GHG impacts is presented in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**. Section 8.9 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** presents the additional mitigation measures for the Proposed Development broken down into the construction, operation (including maintenance), and decommissioning phases, while table 8.9 presents the embedded mitigation measures.
3.3.6	6.3.7	Operational GHG assessment	The operational GHG assessment should include quantification of the operational energy consumption and any associated carbon emissions. Where there are residual emissions, it should include the level of emissions and the impact of those emissions on national and international efforts to limit climate change both alone and, where relevant, in combination with other developments.	Operational GHG emissions, including operational energy use, is quantified in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** table 8.12. The residual emissions for the Proposed Development are compared against national UK carbon budgets, as well as the sectoral (electricity supply) carbon budgets, which provides both national and international (through the UK's alignment to the Paris Agreement) context. The impact of the Proposed Development on GHG emissions in-combination with other similar developments would be the cumulative

ID	Ref	Description	Inspectorate's comment	Applicant's response
				impact, which is addressed in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** paragraph 8.10.2
3.3.7	6.3.6	Operational impacts on climate change	The Scoping Report states that the operation of the Proposed Development is likely to have a positive effect on climate change. The ES should include an assessment that demonstrates how this will be achieved. This should include an explanation of how operational emissions have been reduced as far as possible and how the potential to reduce operational energy demand and consumption has been considered at each stage of the Proposed Development.	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** presents the findings of the GHG assessment which assessed both the emissions resulting from the construction, operation, and decommissioning of the Proposed Development, as well as the GHG savings as a result of its operation. Paragraph 8.10.2 in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** states the net GHG savings as a result of the Proposed Development as being over 3 million tCO_2e, which is a positive effect on climate change. Operational GHG emissions are quantified in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** table 8.12, and include operational energy use. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** Section 8.9 sets out the additional mitigation measures for the construction phase, operation phase, and decommissioning phase of the Proposed

ID	Ref	Description	Inspectorate's comment	Applicant's response
				Development, including potential measures to reduce operational energy demand.
3.3.8	Appendix D	Assessment criteria	Appendix D of the Scoping Report states that the Proposed Development will directly replace energy generated by fossil fuels and the operational GHG emissions savings will be assessed based upon a comparison of its operational emissions to those generated by a gas-fuelled power station. The ES should provide evidence to support any assumptions made to determine the displacement of fossil fuels from other electricity production activities against the contribution of the Proposed Development to reduced GHG emissions.	This is included in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** paragraphs 8.8.20 to 8.8.27, which presents additional comparisons including against current UK grid electricity and other forms of renewable energy.
3.3.9	Appendix D Table D5	Significance criteria - Climate	The Scoping Report does not make clear what calculations would be used to determine the levels of significance illustrated in Table D5 for defining significant climate effects. Terms such as 'may partially meet' or 'Project has minimal residual emissions' are not sufficiently clear or quantifiable to understand how effects at different stages of the Proposed Development would be assessed. The assessment presented in the ES should address this. It should be aligned with the approach, as proposed in the Scoping Report, presented within the Institute of Environmental Management and Assessment (IEMA)'s 'Assessing Greenhouse Gas Emissions and	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** compares project emissions for construction/operation/decommissioning with national and sectoral carbon budgets to assess significance. The terminology used for significance, including 'may partially meet' or 'Project has minimal residual emissions', are taken directly from the IEMA (2022) guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance Section 6.3. As

ID	Ref	Description	Inspectorate's comment	Applicant's response
			Evaluating their Significance' as the basis for the assessment of effects. With reference to Scoping Opinion ID 3.3.1 above, a separate methodology and criteria should also be presented for the assessment of climate resilience.	such, in order to align with the guidance, these terms cannot be reworded. Separate methodology and significance criteria for climate resilience are included in **ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4]**.
Cultural Heritage				
3.4.1	6.4.9	Setting effects on all heritage assets - construction	The Scoping Report states that the construction phase effects resulting from changes in the setting of heritage assets will be temporary and, for visual effects, no worse than the operational phase effects. It is stated that other construction phase effects would be controlled through an oCEMP and it is not considered necessary to repeat the setting assessment for the construction phase. The Inspectorate does not have sufficient information about the potential noise, dust and visual impacts or the proposed mitigation to agree with the assumption that the construction phase effects would be no worse than the operational phase effects or that LSE can be excluded. Accordingly, the ES should include an assessment of this matter or evidence demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	Agreement has been reached with Historic England and Buckinghamshire Council regarding the assets scoped into the ES for effects resulting from changes to their setting.. Information supporting the scoping in or out of heritage assets is provided within ES Volume 4, Appendix 9.1: **Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). These effects are considered for construction, operation (including maintenance) and decommissioning stages. This is addressed **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** with cross-reference to **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.4.2	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): scheduled monuments - operation	It is proposed to scope out six scheduled monuments within the study area based on the distance between the assets and the Proposed Development, and the fact that agricultural fields surrounding the assets (which contribute towards their significance) would not be materially altered by the Proposed Development. Given the stage of design and absence of detailed information about the Proposed Development layout, the Inspectorate does not have sufficient information to exclude the possibility that changes to surrounding agricultural fields would result in significant effects on the six scheduled monuments. The ES should include an assessment of significant effects to the scheduled monuments, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes further detail about these assets and 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]**) has identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes) and therefore no further assessment has been undertaken of four of the scheduled monuments. Following engagement with Historic England and Buckinghamshire Council agreement was reached to scope in only the Deserted village (site of) at Fulbrook Farm (Scheduled Monument, NHLE1006939) and 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 (Scheduled Monument, NHLE 1405586). The assessment of these assets for construction, operation (including maintenance) and decommissioning phases

ID	Ref	Description	Inspectorate's comment	Applicant's response
				is included in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**
3.4.3	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): listed houses and cottages (other than Grade II listed 23 Orchard Way, Weir Cottage, 1 and 3 Orchard Way, Pond Cottage and 5 Orchard Way) - operation	It is proposed to scope these receptors out on the basis that they are small dwellings within settlements that would not be affected due to the distance from the Proposed Development, topography and existing screening. The Inspectorate considers that it is unlikely that these assets would be subject to LSE but notes that the Scoping Report does not contain information about their location or any possible impacts from other sources such as noise and air quality change. The ES should include an assessment of significant effects, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes further detail about these assets and 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]**) has identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes). Following this assessment and engagement with Historic England and Buckinghamshire Council the list of assets scoped into the assessment at **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been agreed.
H3.4.4	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of	It is proposed to scope out all listed churches and crosses (14 assets in total) on the basis that these assets do not derive significance from views that include the site of the Proposed Development. It is also stated that the closest of these assets, the Grade II listed Church of All Saints within Claydon Registered	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes an assessment of all designated assets including listed churches and crosses in the

ID	Ref	Description	Inspectorate's comment	Applicant's response
		the Scoping Report): listed churches and crosses - operation	Park and Garden, is circa 740m distant and surrounded by mature trees. The Inspectorate considers that it is unlikely that assets located at a further distance from the Proposed Development would be subject to LSE but notes that the Scoping Report contains limited evidence to support the statement that the assets do not derive significance from views and does not contain information about possible impacts from other sources such as noise and air quality change. The ES should include an assessment of significant effects, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies. It is also noted that setting effects to the Grade II Claydon Registered Park and Garden during operation are proposed to be scoped in; if there is potential for LSE to this asset that could have a bearing on its relationship with the Grade II listed Church of All Saints resulting in LSE on the Church, this should be assessed in the ES.	study area. and 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]**) has identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes)Following this assessment and engagement with Historic England and Buckinghamshire Council it was agreed that the Church of All Saints within Claydon Registered Park and Garden (which is a , Grade I Listed Building (NHLE 1214762)) and the Church of St Mary within East Claydon (a Grade II* Listed Building (NHLE 1289625)), would be scoped in due to their proximity to the Proposed Development. 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]**) has included consideration of the relationship between the Church of All Saints and the Registered Park and Garden of Claydon. No significant effects on the church have been identified.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.4.5	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): listed farmhouses and agricultural buildings (other than Grade II listed Pond Farmhouse, Finemerehill Farmhouse and Dry Leys Farmhouse) - operation	It is proposed to scope these receptors out on the basis that they are located at a distance from the Proposed Development which means that changes in land use would not affect their significance. The Inspectorate considers that it is unlikely that assets located at a further distance from the Proposed Development would be subject to LSE but notes that the Scoping Report does not contain information about the location or distance of these assets from the Proposed Development or any possible impacts from other sources such as noise and air quality change. The ES should include an assessment of significant effects, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes further detail about these assets and 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]**) has identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes). Following this assessment and engagement with Historic England and Buckinghamshire Council the list of assets scoped into the assessment at **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been agreed.
3.4.6	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): listed country houses	It is proposed to scope these receptors out on the basis that the two remaining country houses (Winslow Hall and St John's Manor) within the study area are more than 2km from the Proposed Development and do not draw significance from views across the site. The Inspectorate considers that it is unlikely that assets located at a further distance from the Proposed Development would be subject to LSE but notes that	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes further detail about these assets and 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]**) has

ID	Ref	Description	Inspectorate's comment	Applicant's response
		(other than Grade I listed Claydon House) - operation	the Scoping Report contains limited information to support the assertion that the assets do not draw significance from views and does not consider possible impacts from other sources such as noise and air quality change. The ES should include an assessment of significant effects, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes). Following this assessment and engagement with Historic England and Buckinghamshire Council it has been agreed that no other designated country houses should be scoped into the assessment.
3.4.7	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): other listed buildings - operation	It is proposed to scope out various other buildings and structures (military buildings, telephone kiosks, war memorials, gates, gate piers, walls and bridges, public houses, water pumps and well head) on the basis that the positive contribution of their setting does not extend to the site of the Proposed Development; and in the case of gates, gate piers, walls and bridges that they are experienced in close proximity to their settlements or houses. The Inspectorate considers that it is unlikely that these assets would be subject to LSE but notes that the Scoping Report does not contain information about the location or distance of these assets from the site or any possible impacts from other sources such as noise and air quality change. The ES should include an assessment of significant effects, unless evidence is provided in the ES	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) includes further detail about these assets and 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]**) has identified that there would be negligible impacts on the significance of these assets (including from any noise and air quality changes). Following this assessment and engagement with Historic England and Buckinghamshire Council the list of assets scoped into the assessment at **ES Volume**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	**2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been agreed.
3.4.8	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): conservation areas - operation	It is proposed to scope out the other 12 conservation areas within the study area (with Botolph Claydon and Middle Claydon Conservation Areas scoped into the ES), on the basis that they are more than 1.7km from the Proposed Development and not anticipated to have visibility. The Inspectorate notes that BC (Appendix 2 of this Scoping Opinion) has advised that Quainton Conservation Area appraisal identifies long distance landscape views that contribute towards its significance, and that Grendon Underwood Conservation Area also benefits from extensive landscape views. The Inspectorate notes that the Scoping Report does not contain information about the location of conservation areas within the context of the Zone of Theoretical Visibility (ZTV) or possible impacts from other sources such as noise and air quality change. The Inspectorate does not have sufficient information to exclude LSE and advises that the ES should include an assessment of all conservation areas in the study area (including Botolph Claydon and Middle Claydon Conservation Areas), unless evidence is provided in the ES demonstrating the absence of a	All Conservation Areas within the 5km study area have been considered within the Stage 1 Setting Assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) Following this assessment and engagement with Historic England and Buckinghamshire Council it has been agreed that with the exception of Botolph Claydon and Middle Claydon Conservation Areas all others could be scoped out of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. East Claydon village, although not designated as a Conservation Area has also been scoped in as a group of designated and non-designated heritage assets of similar character to the Botolph and Middle Claydon Conservation Areas. **Figure 9.3: Designated heritage assets within 5km of the Order Limits overlain with the ZTV [EN010158/APP/6.3]** shows all designated heritage assets within the

ID	Ref	Description	Inspectorate's comment	Applicant's response
			LSE and agreement with the relevant consultation bodies.	study area and their relationship to the zone of theoretic visibility.
3.4.9	6.4.9 and Appendix G, Sections 1.1 to 1.4	Designated heritage assets within the 5km study area that are not scoped in (in paragraph 6.4.8 of the Scoping Report): registered parks and gardens (other than the Grade II listed Registered Park and Garden at Claydon) - operation	It is proposed to scope out registered parks and gardens within the 5km study area (including Grade I listed Waddesdon Manor and Wotton House) on the basis that they are more than 3.5km from the Proposed Development and are not predicted to have visibility. The Inspectorate notes that these assets are shown on Figure 6 of Appendix I of the Scoping Report Appendices and that Figure 5 of Appendix I indicates there is likely to be some visibility in these locations based on the ZTV. In its consultation response (Appendix 2 of this Scoping Opinion), BC states that these assets have designed views, often over a greater distance, which contribute towards setting and significance. The Inspectorate does not have sufficient information to exclude the possibility of LSEs, and effects to Grade I Waddesdon Manor and Wotton House should be assessed in the ES, unless evidence is provided in the ES demonstrating the absence of a LSE and agreement with the relevant consultation bodies.	All registered parks and gardens within the 5km study area have been considered within **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). Following this assessment and engagement with Historic England and Buckinghamshire Council it has been agreed that no other registered parks and gardens should be scoped into the assessment.
3.4.10	6.4.9	Findspots recorded by the Historic	The Scoping Report states that as findspots, these assets have been removed from the site, and the	This has been noted, and the Applicant can confirm that further findspots identified from

ID	Ref	Description	Inspectorate's comment	Applicant's response
		Environment Record (HER) within the site	heritage significance of their former locations will not be harmed by the Proposed Development. The Inspectorate agrees that this matter can be scoped out from further assessment. For the avoidance of doubt, the Inspectorate understands that the other HER record within the site (i.e., the ridge and furrow earthworks) would be assessed in the ES (see the Inspectorate's further comments at ID 3.4.16 of this Scoping Opinion). If during further intrusive archaeological investigations, new findspots are identified the ES should include an assessment of impacts to such findspots, where significant effects are likely to occur.	intrusive archaeological investigations have been incorporated into the assessment in the ES. These finds form part of the heritage asset known as "area of Iron Age to Romano-British settlement activity (HA1/ MBC45205).
3.4.11	6.4.9 and Appendix G, Sections 1.5	Non-designated heritage assets within the 1km study area but outside of the scoping boundary, other than Catherine Farm	The Scoping Report states that there would be no direct impact on these assets as they are located outside of the Proposed Development site. Aside from Catherine Farm, it is stated that all other non-designated heritage assets within the 1km study area derive significance from historical or archaeological interest and any further significance from their setting or positive contribution of setting to significance does not extend to the site. The Inspectorate agrees that direct physical impacts to non-designated heritage assets within the 1km study area but outside the scoping boundary can be scoped out of further assessment.	This has been noted. This is addressed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** and associated figures showing the locations of the relevant assets within the ZTV **[EN010158/APP/6.3]**. Non-designated heritage assets within the study area are included within the Stage 1 Setting Assessment **(Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). Following this

ID	Ref	Description	Inspectorate's comment	Applicant's response
			The Inspectorate notes that the Scoping Report does not contain information about their location within the context of the ZTV. The ES should include an assessment of significant effects where these are likely to occur or otherwise confirm why they would not, including confirmation of their location and intervisibility with the Proposed Development. This should include consideration of any cumulative harm arising from effects to assets that have significance as a group. The Applicant's attention is drawn to the comments of BC (Appendix 2 of this Scoping Opinion).	assessment and engagement with Buckinghamshire Council the list of non-designated heritage assets scoped into the assessment at **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been agreed. The group value of heritage assets forms part of how their setting contributes to their significance, this is considered within **Annex D of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). East Claydon village, although not designated as a Conservation Area has also been scoped in as a group of designated and non-designated heritage assets of similar character to the Botolph and Middle Claydon Conservation Areas. **Figure 9.2: Non-designated heritage assets within 1km of the Order Limits overlain with the ZTV [EN010158/APP/6.3]** shows all non-designated heritage assets within the study

ID	Ref	Description	Inspectorate's comment	Applicant's response
				area and their relationship to the zone of theoretic visibility.
3.4.12	6.4.9	Decommissioning effects	The Scoping Report states that decommissioning will not result in impacts upon any heritage assets that were not affected during construction and operation, and that setting effects during decommissioning would not be any worse than construction or operational phase effects. The Inspectorate considers that there is potential for effects on buried archaeological resource, such as the potential for harm due to compaction, removal of piles and subsequent potential changes in drainage patterns. In addition, given that the potential effects on setting during decommissioning are likely to be similar to those experienced during construction, the Inspectorate is of the opinion that this matter cannot be scoped out at this stage for assets scoped into the construction and operational phase assessments. Please refer to the Inspectorate's comments at ID 3.4.1 of this Scoping Opinion.	This has been noted, and the assessment considers the impacts upon heritage assets and buried archaeological resources during decommissioning in Section 9.10 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**.
3.4.13	N/A	Direct physical impacts to designated heritage assets	For the avoidance of doubt, the Inspectorate notes that there are no designated heritage assets within the scoping boundary and as such considers that LSEs from direct physical impacts can be scoped out of the ES.	This has been noted and there remain no designated heritage within the Order Limits.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.4.14	6.4.2	Study area	The Scoping Report states that following consultation with BC, a 1km study area from the scoping boundary will be used for non-designated heritage assets and a study area of up to 5km for designated heritage assets, which has been informed by the ZTV model provided in Appendix I (Scoping Report Appendices). The Inspectorate notes that the ZTV Figures 1 to 4 in Appendix I (Scoping Report Appendices) indicate theoretical visibility of some of the Proposed Development components beyond 5km. Whilst paragraph 1.1.2 of Appendix G (Scoping Report Appendices) states that accessible designated heritage assets within the ZTV were visited to ascertain potential invisibility with the Proposed Development, assets beyond the 5km study area do not appear to have been considered as part of this process. The Scoping Report does not contain information about the location of non-designated heritage assets in the context of the ZTV. The Inspectorate considers that the study area(s) should be determined relevant to the extent of the likely impacts and should be depicted on a supporting plan. This should include consideration of potential for designated heritage assets beyond 5km, and non-designated heritage assets beyond 1km, to be affected. The Inspectorate also considers that the setting influence of assets may extend beyond their	The 1km and 5km study areas have been agreed with Buckinghamshire Council and Historic England (as set out in Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**). Consideration was given to heritage assets beyond these areas with reference to the zone of theoretic visibility (as illustrated on **ES Volume 3, Figure 9.2: Non-designated heritage assets within 1km of the Order Limits overlain on ZTV [EN010158/APP/6.3]**) and **ES Volume 3, Figure 9.3: Designated heritage assets within 5km of the Order Limits overlain on ZTV [EN010158/APP/6.3]**). The list of assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**), has been agreed with Historic England and Buckinghamshire Council.

ID	Ref	Description	Inspectorate's comment	Applicant's response
			strict designation boundary and that the wider landscape context should be considered in the assessment (in conjunction with assessments in the Landscape and Visual Chapter). The Applicant should make efforts to agree the approach with all relevant consultation bodies. The Applicant's attention is drawn to the comments of BC in this regard (Appendix 2 of this Scoping Opinion).	
3.4.15	6.4.4	Surveys	The Scoping Report states that a written scheme of investigation (WSI) for a geophysical survey of the site has been agreed with BC, and that further consultation post-completion of the survey would be carried out to confirm the scope and timing of any intrusive archaeological evaluation required. The Inspectorate advises that where necessary, any intrusive investigations and trial trenching should be completed prior to submission of the DCO application to inform the assessment in the ES. Evidence of consultation with BC and any other relevant consultation bodies about the scope and timing of intrusive investigation should be provided within the ES. The Applicant's attention is drawn to the comments of BC in this regard (Appendix 2 of this Scoping Opinion).	Engagement with Buckinghamshire Council in relation to the scope of required trial trenching is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** The scope of the intrusive evaluation carried out to inform the ES was detailed within a Written Scheme of Investigation (WSI) submitted to and approved by the Buckinghamshire Council Archaeological Advisor and Historic England. In line with other solar farm DCO's and emerging best practice guidance further evaluation is proposed to be carried out to inform the detailed design and mitigation for the Proposed Development post-consent. An outline scope of further evaluation is set out in the **Draft Archaeological Management Strategy**

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				[EN010158/APP/7.10] which would be secured by a DCO Requirement
3.4.16	6.4.6	Additional archaeological mitigation	The Scoping Report states that where there are archaeological remains identified within the site that are not of such importance that they require preservation in situ, but that cannot be avoided by the Proposed Development, it is anticipated that additional mitigation during the construction phase will take the form of a programme of archaeological investigation and recording, secured by a DCO requirement. It is stated that this would be agreed with BC's archaeological advisor and Historic England where necessary, with details set out in an outline WSI (oWSI). As noted above at ID 3.4.17, the Inspectorate considers that, where necessary, intrusive investigation and trial trenching should be carried out prior to DCO submission and used to inform the ES assessment, which should be based on robust baseline data. The assessment conclusion should be used to inform the mitigation strategy as required. The Inspectorate advises that the oWSI should be submitted with the DCO application and cross-reference made from the ES as appropriate.	A programme of further archaeological investigation and recording is secured by a Requirement in the **Draft DCO [EN010158/APP/3.1]**. This ensures that detailed design will be informed by further archaeological work and mitigation in accordance with the detail set out in the **Archaeological Management Strategy [EN010158/APP/7.10].** Pre-determination trial trenching has been conducted over areas of hard infrastructure and has been used to inform the ES assessment and an outline programme of further archaeological evaluation and mitigation is detailed in the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**. The **Draft Archaeological Management Strategy [EN010158/APP/7.10]** includes general methodologies for evaluation and mitigation as would be included within an outline Written Scheme of Investigation (Outline WSI) and requires that detailed Written Schemes of Investigation (WSIs) are

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			The Applicant's attention is drawn to the comments of BC in this regard (Appendix 2 of this Scoping Opinion).	submitted to and approved by Buckinghamshire Council (and where relevant Historic England). Outline mitigation measures to protect archaeological remains during construction, operation (including maintenance) and decommissioning are included with the **Draft Archaeological Management Strategy [EN010158/APP/7.10]** and will be confirmed following the completion of further evaluation. These measures are also detailed within the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.which will also be updated following the completion of the further evaluation and agreed with Buckinghamshire Council.
3.4.17	6.4.6	Additional mitigation for setting impacts to heritage assets	The Scoping Report states where setting impacts to heritage assets cannot be avoided, additional mitigation to offset any operational phase adverse impacts will most likely involve planting and landscaping. The Inspectorate advises that mitigation required to address significant adverse effects is fully described in the ES and demonstrably secured. Noting the Inspectorate's comments at ID 3.4.1 and 3.4.12 of this Scoping Opinion, this should also include	Mitigation to offset any operation (including maintenance) phase adverse impacts has been incorporated into the Proposed Development through the layout of the Proposed Development and siting of infrastructure (as shown on the **Works Plans [EN010158/APP/2.3]**) and through

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			mitigation required during construction and decommissioning of the Proposed Development.	mitigation measures which includes a scheme of landscape planting. Mitigation to reduce any construction or decommissioning phase effects resulting from changes to the setting of heritage assets will be secured through the **Outline CEMP [EN010158/APP/7.2]**, **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** and **Outline DEMP [EN010158/APP/7.4]**. These measures are detailed in **Table 9.8** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** which also sets out how these measures are secured**.** This mitigation includes new hedgerow planting along the western boundary of Field B5, adjacent to Pond Farm access to soften views and provide screening of views from the access track to Pond Farmhouse and infill hedgerow planting and strengthening of avenue of poplar trees to Three Points Lane to soften and partially screen views of Solar PV modules and Satellite Collector Compound from Claydon Park (NHLE1000597).

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.4.18	Paragraph 6.4.12	Difficulties and uncertainties	The Scoping Report states that existing records for the historic environment do not record all heritage assets and that this will be addressed through desk-based assessment, aerial investigation and mapping and geophysical survey. The Inspectorate advises that the ES should explain whether there are any remaining uncertainties in the assessment and, if so, the implications of these for the assessment conclusions. Where uncertainty exists, the assessment should be based on a worst-case scenario.	A desk-based assessment, geophysical survey and aerial investigation and mapping report have been undertaken and are detailed in **Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4], Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4]** and **Appendix 9.4: Aerial Investigation and Mapping Report [EN010158/APP/6.4]**. Any difficulties or uncertainties that have been encountered in undertaking the cultural heritage assessment and surveys and any implications for the assessment conclusions are detailed in **Section 9.13** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**.
3.4.19	N/A	Direct impact pathways	The Scoping Report provides limited information about the potential direct impact pathways for LSEs to non-designated heritage assets within the scoping boundary. For the avoidance of doubt, the ES should include (but not be limited to) consideration of installation and removal of piling, cable trenching, any tracking platforms and any deep ploughing, along with any alterations to drainage patterns or dewatering.	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** includes consideration of potential direct impact pathways, such as cable trenching and installation of below ground cabling and disturbance by piling for the Solar PV module supports. The mitigation measures secured though the **Outline CEMP [EN010158/APP/7.2]**, **Draft**

ID	Ref	Description	Inspectorate's comment	Applicant's response
				Archaeological Management Strategy [EN010158/APP/7.10] and **Outline DEMP [EN010158/APP/7.4]** would ensure that archaeological remains would not be impacted by removal of piles, deep ploughing or alterations to drainage patterns or dewatering.
3.4.20	N/A	Visuals	The Scoping Report does not specify whether any photomontages or visual representations would be prepared to support the assessment of cultural heritage. Effort should be made to agree the number and location of any viewpoints required to support the assessment of setting effects with relevant consultation bodies including Historic England and the host local authorities.	Photomontages from west of the Claydon House terrace have been produced (Viewpoint 5 within **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**) and issued to Historic England to address their concerns about these views towards Knowl Hill. Several viewpoints have been discussed and agreed with Historic England and Buckinghamshire Council as detailed in **Table 9.1** of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. These are illustrated in **ES Volume 4, Appendix 10.6 - LVIA Visualisations [EN010158/APP/6.4]**, additional viewpoints requested by Historic England have been reviewed within a 3D model and considered within **Annex D** of **Appendix 9.1: Archaeological Desk-based Assessment**

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				and Setting Assessment [EN010158/APP/6.4].
3.4.21	N/A	Non-designated heritage assets	In addition to the HER records referenced in paragraph 6.4.5 of the Scoping Report, the assessment should also consider non-designated heritage assets on BC's 'Local List' where there is potential for LSEs to occur during all phases of the Proposed Development. In undertaking the assessment of effects to ridge and furrow earthworks, consideration should be given to the whole area of open fields, as part of their significance derives from landscape and group value.	Heritage assets on Buckinghamshire Council's Local List have been included within the Stage 1 Setting Assessment **(Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) Effects to ridge and furrow earthworks have been considered both as individual groups of open fields (each associated with separate settlements) and as part of the surviving post-medieval field system. These are included within **ES Volume 2: Chapter 9** as " Direct physical impacts to below ground remains of medieval field systems (HA2, HA3, HA4, HA5)"
Land, Soil and Groundwater				
3.5.1	6.5.9	Impacts to geological units - all phases	The Scoping Report states that there are no sensitive geological units within the study area and that the geology comprises bedrock units of mudstone with	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** defines and assesses any potential LSE on sensitive geological units (in Section 11.5 and Section 11.10). It was agreed with

ID	Ref	Description	Inspectorate's comment	Applicant's response
			superficial units derived from glacial and glaciofluvial actions. The Inspectorate is unclear from information presented in the Scoping Report what is meant by a "sensitive geological unit'" and notes that the Scoping Report refers to alluvium geological units being present, which form part of a mineral safeguarding area. The Inspectorate advises that the ES should include an assessment of impacts to geological units or demonstrate an absence of LSE, together with evidence of agreement with relevant consultation bodies. The Inspectorate's comments at IDs 3.5.3 and 3.5.8 of this Scoping Opinion are relevant to this matter.	Buckinghamshire Council that mineral safeguarding could be scoped out of the ES chapter (as detailed in Table 11.1 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**), with supporting information presented in the form of a Mineral Safeguarding Assessment (see **Appendix 2 – Mineral Safeguarding Assessment** of the **Planning Statement [EN010158/APP/5.7]**).
3.5.2	6.5.9	Impacts to geological conservation sites - all phases	The Scoping Report states that there are no geological SSSIs within the application site or 1km buffer. On that basis, the Inspectorate agrees that this matter can be scoped out of the ES.	Thes topic of geological conservation sites has been scoped out of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Table 11.3).
3.5.3	6.5.9	Impacts to mineral safeguarding areas - all phases	The Scoping Report identifies that there are several mineral safeguarding areas within the Proposed Development site and states that mineral safeguarding issues would be assessed within the Planning Statement, outwith the ES.	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** includes details of the consultation that has been undertaken with Buckinghamshire Council (see Table 11.1), the conclusion of which was that an assessment of effects on

ID	Ref	Description	Inspectorate's comment	Applicant's response
			The Inspectorate does not have sufficient information at this stage to exclude the possibility of significant effects to mineral resource. The ES should include an assessment of the potential impact of loss of access to mineral resources during the lifetime of the Proposed Development where there is potential for LSE to occur, unless evidence is provided in the ES demonstrating agreement with the relevant consultation bodies and the absence of a LSE. Evidence of consultation with BC, as the Mineral Planning Authority, should be presented in the ES.	mineral safeguarding areas was agreed to be scoped out of the ES. A mineral safeguarding assessment is presented within the submission as **Appendix 2 – Mineral Safeguarding Assessment of the Planning Statement [EN010158/APP/5.7]**.
3.5.4	6.5.9	Impacts to geological hazards - all phases	The Scoping Report states that the baseline review has not identified any geological hazards that require consideration. However, the Inspectorate notes that paragraph 6.5.5 of the Scoping Report states that there is potential for low to moderate risk from geological hazards within some sections of the Proposed Development site. The Inspectorate does not have sufficient information at this stage to exclude the possibility of significant effects arising from geological hazards. The ES should include an assessment where there is potential for LSE to occur, unless evidence is provided in the ES demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** defines low/moderate risk from geological hazards and provides further information relating to this issue, demonstrating the absence of a LSE and providing confirmation that an agreement was reached with the relevant consultation body that a LSE was considered absent.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.5.5	6.5.9	Potential land contamination in all areas except Parcel 3 - construction	The Scoping Report states that a review of historical site use and mapping identified that, aside from Parcel 3, the Proposed Development site has been in agricultural use. However, Figure 6.5.1 in Appendix H (Scoping Report Appendices) shows that Parcel 1 is located adjacent to a landfill site/ infilled land (Calvert Pit) and paragraph 2.3.36 states that Parcel 1 formed an extensive area of quarrying associated with brickworks and historic landfills. A PRA has not been submitted with the Scoping Report (although there is a commitment to produce one for the DCO application, see ID 3.5.10 of this Scoping Opinion), so assumptions about existing land contamination have not been verified and there remains a risk that contamination may be present. Until the results and recommendations of a PRA are known, there is insufficient evidence to support scoping this matter out. The ES should be supported by the findings of a PRA, which should include consideration of permitted landfill at Calvert Pit, and where land contamination is identified, the ES should assess significant effects where they are likely to occur.	The topic of potential land contamination has been scoped into the assessment. **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** provides details relating to the identified landfills etc. and this information has been used in preparing the assessment within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Sections 11.10.3, 11.10.8 and 11.10.13) and mitigation included in the **Outline CEMP [EN010158/APP/7.2]**.
3.5.6	6.5.9	Potential land contamination -	The Inspectorate agrees that significant effects from existing land contamination during operation and decommissioning are unlikely to occur on the basis	Further to consultation with Buckinghamshire Council, it was requested that potential land contamination during

ID	Ref	Description	Inspectorate's comment	Applicant's response
		operation and decommissioning	that it would be addressed during construction and agrees that this matter can be scoped out of further assessment. The Inspectorate considers it unlikely that there would be significant land contamination effects arising from the Proposed Development, i.e. from project activities such as storage and use of fuels, during operation and decommissioning on the basis that activities would be controlled through an OEMP and DEMP. However, at this stage limited information has been provided about the measures proposed to be included within the management plans. This matter should be assessed in the ES where significant effects are likely to occur or it should otherwise be explained how potential impacts would be managed, with measures clearly described in an oOEMP and oDEMP, which are secured through the DCO. Measures should include protection for groundwater receptors and a remediation strategy in the event of accidental leaks or spills.	operation (including maintenance) and decommissioning phases of the Proposed Development should be scoped into the assessment, alongside potential contamination during construction (see Table 11.2 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**). Potential land contamination during operation and decommissioning is therefore addressed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Sections 11.10.8 and 11.10.13). Associated mitigation measures, including in regards to protection of groundwater receptors and a remediation strategy are included the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4**], which are secured in the **Draft DCO [EN010158/APP/3.1]**.
3.5.7	6.5.9	Impacts to soils and ALC land - all phases	The Scoping Report states that based on the completed Agricultural Land Classification (ALC) survey, less than 3% of the Proposed Development site (excluding the cable search area) is Best and Most Versatile (BMV) land (Grade 2 and 3a), equating to approximately 14 hectares. It is not anticipated that	An assessment of BMV and soils is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and associated mitigation measures are included in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3],**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			there would be a significant effect to BMV land on that basis. The ALC survey report has not been submitted with the Scoping Report and the data is not yet complete, as the cable search area is still to be surveyed. The Inspectorate does not have sufficient information to exclude the possibility of significant effects to BMV land at this stage. This matter should be assessed in the ES or it should be explained why significant effects are not likely to occur, with evidence of agreement to the approach from relevant consultation bodies. The ES should quantify the total amount of agricultural land that would be lost and/or temporarily unusable (and over what duration of time), particularly any BMV land, and consider this loss within a regional context. Cumulative loss should be considered within the cumulative effects assessment. The Scoping Report states that significant effects to soils would be avoided through mitigation, including appropriate soil handling and protection of groundwater, with measures set out in outline versions of a CEMP, OEMP and DEMP submitted with the DCO application. Limited information about the proposed measures has been provided with the Scoping Report. The Inspectorate does not have sufficient information to exclude the possibility of significant effects at this stage. Accordingly, the ES	**Outline DEMP [EN010158/APP/7.4]** and **Outline SMP [EN010158/APP/7.7]**. The results of the ALC survey are presented in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]**. There is a total of 53ha which could not be surveyed due to access restrictions; within this area, the ALC grades have been predicted through interpolating the ALC survey results as well as assessing the desk-based information available. Based on all available sources of data, the ES assessment has assumed that the land is of 3b quality in agreement with Natural England (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**) with surveys aiming to be undertaken post-submission of the DCO Application. **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** includes an assessment of soils and ALC land and sets out the amount of land that would be temporarily unavailable during the operational phase of the Proposed Development and considers this within a regional context. The assessment includes consideration of soil quality and

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			should include an assessment of this matters or evidence demonstrating agreement with the relevant consultation bodies and the absence of a LSE. This should include consideration of changes to the hydrogeological regime and how this might affect soil quality. The Applicant's attention is drawn to the consultation response of NE (Appendix 2 of this Scoping Opinion) regarding soils and BMV land.	demonstrates that LSE are unlikely. Consultation with relevant consultation bodies are set out in Table 12.1 of **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]**. A cumulative assessment considering the cumulative loss of agricultural land is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].** See **Section 2** for the Applicant's response to the consultation response of NE.
3.5.8	6.5.9	Impacts to groundwater quality - all phases	The Scoping Report states that the quality of groundwater would be appropriately protected by proposed mitigation, with measures set out in outline versions of a CEMP, OEMP and DEMP. It is stated that any piling required would be managed in accordance with a piling risk assessment, undertaken prior to construction. A surface water strategy would incorporate best practice measures to minimise adverse effects and reduce potential for changes to groundwater. Paragraph 6.5.5 states that the site is not located within a Source Protection Zone (SPZ) and bedrock deposits are defined as secondary A aquifer or secondary aquifers (undifferentiated). The Inspectorate does not have sufficient information about construction and decommissioning activities and	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** confirms that groundwater receptors are scoped into the assessment (see Table 11.2). An assessment of impacts to groundwater is presented in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** and mitigation included in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]** .

ID	Ref	Description	Inspectorate's comment	Applicant's response
			whether these could lead to creation of contamination pathways, e.g. piling, trenching, borrow pits. Nor is detailed information about the mitigation proposed provided. The ES should assess impacts to groundwater during all phases of the Proposed Development where significant effects are likely to occur or demonstrate absence of LSE, with evidence of agreement to the approach from statutory consultation bodies. Any proposed mitigation should be described in the ES, together with confirmation of how measures would be secured through the DCO. The Inspectorate's comments regarding groundwater flood risk are provided above at ID 2.3.8 of this Scoping Opinion. The Applicant's attention is drawn to the EA's comments (Appendix 2 of this Scoping Opinion) about updates to its guidance on piling and the potential need for a foundation works risk assessment.	If required, a piling risk assessment and foundation works risk assessment will be prepared with reference to the EA's guidance documents.
3.5.9	6.5.2	Study area	The Scoping Report states that a study area of the application site plus a 1km buffer will be used for both the assessment of land and soils and for groundwater receptors. No justification is presented for the selection of these areas. The ES should explain the basis on which the final study area has been selected. This should be informed by an understanding of the	Information regarding the study area size selection is provided in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**. (see Sections 11.4.1 to 11.4.3).

ID	Ref	Description	Inspectorate's comment	Applicant's response
			predicted ZOI of the Proposed Development rather than a generic geographical distance.	
3.5.10	6.5.3	Baseline data sources	The Scoping Report refers to various data sources that have been used to characterise the baseline conditions at the site, including historical mapping, a site-specific ALC survey and an Envirocheck Report. It is also proposed to prepare a PRA. Copies of reports used to establish the baseline conditions at the Proposed Development site should be submitted as part of the ES, which could be in the form of technical appendices.	Full information on the baseline assessment is presented in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Sections 11.5.5 to 11.5.37 and **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]**).
3.5.11	6.5.4	Ground investigation surveys	Effort should be made to agree the scope and method of the proposed ground investigation works with relevant consultation bodies. Copies of any ground investigation reports should be submitted as part of the ES, which could be in the form of technical appendices.	GI works have occurred across parts of the Order Limits where access has been granted. The remaining GI surveys will be undertaken post-consent and are secured within the **Outline CEMP [EN010158/APP/7.2]**.
3.5.12	6.5.4 to 6.5.5	ALC surveys	The Scoping Report states that an ALC survey has been completed for the Proposed Development site, excluding the cable search area and at East Claydon substation. Paragraph 6.5.5 states that it is anticipated that an ALC survey for the potential cable route connection will be undertaken when the route location has been refined. It is unclear whether this would be prior to any DCO application submission. Where no	The results of the ALC survey are presented in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]**. There is a total of 53ha which could not be surveyed due to access restrictions (all within the Interconnecting Cable Corridor); within this area, the ALC grades have been predicted

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			surveys are proposed within areas of construction works for the Proposed Development, the ES should provide a justification for this and how it can be assured that the ALC is adequately classified and how the area of construction works can be returned to its baseline ALC for agricultural use during operation, including for intrusive methods such as trenching. Where ALC data is presented, it should include the entirety of the area required for the construction and operation of the Proposed Development, including any temporary access roads.	through interpolating the ALC survey results as well as assessing the desk-based information available as agreed with Natural England (see Table 12.1 in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**). Further detail on the ALC survey is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation measures are secured within the **Outline SMP [EN010158/APP/7.7]** which includes methods to minimise impacts on land and how the area of construction works can be returned to its baseline ALC. **ES Volume 3, Figure 12.1 [EN010158/APP/6.3]** illustrates the ALC classification of the Order Limits.
3.5.13	6.5.5 and Appendix H	Baseline conditions and supporting figures	The figures provided within Scoping Report Appendix H: Land and Soil Figures show a red line boundary only around three land parcels (1, 1a, 2 and 3) not the entirety of the Proposed Development. No baseline information about groundwater receptors is provided in the figures. Relevant figures accompanying the ES assessment should consistently and accurately illustrate the red line boundary and applicable study area. The figures should clearly present baseline	This has been noted. The entire Order Limits are presented in the figures supporting **Chapter 11: Land and Groundwater** and **Chapter 12: Soil** in **ES Volume 3 [EN010158/APP/6.3]** and is consistent throughout the ES figures. **ES Volume 3, Figure 11.3: Sensitive receptors relating to groundwater [EN010158/APP/6.3]** illustrates the baseline information about groundwater receptors.

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			information across the entirety of the Proposed Development site, for all relevant receptors.	Other baseline information in relation to Land and Groundwater and Soil, are presented in **ES Volume 3, Figures 11.2, 12.1 and 12.2 [EN010158/APP/6.3]**.
3.5.14	6.5.6	Outline soils management plan	In addition to soil management measures, the ES should also explain how the design has considered how to avoid, prevent, or reduce any potential LSE on BMV land or explain why this is not feasible.	The approach to the design and consideration towards BMV land is presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.2]** and **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]**. Further detail is also presented in **Appendix 1: Site Selection Report of the Planning Statement [EN010158/APP/5.7]**.
3.5.15	6.5.8	Potential land contamination in Parcel 3	The Scoping Report states that this matter is scoped in but refers to it being assessed in the PRA. For the avoidance of doubt, consideration of effects arising from the potential release of existing contamination at Parcel 3 during construction of the Proposed Development should be assessed in the ES.	An assessment of potential release of existing contamination (in relation to Parcel 3, alongside the entire Order Limits) is assessed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2].**
3.5.16	N/A	BESS and firewater	The ES should include consideration of the potential for escape of firewater/foam and contaminants that they may contain as an impact pathway to surface and groundwater receptors. Suitable protection measures should be identified for any LSE identified.	The potential for groundwater contamination due to the escape of BESS firewater/foam and associated contaminants is considered in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2].** Mitigation measures to prevent the

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				contamination of groundwater is set out and secured in the **Outline Battery Safety Management Plan [EN010158/APP/7.9], Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.
Landscape and Visual				
3.6.1	6.6.9	Chilterns Area of Outstanding Natural Beauty (AONB) - all phases	The Scoping Report states that the Chilterns AONB is situated 18km from the proposed development and that there would be no visibility at this distance. The Inspectorate agrees that this matter can be scoped out of further assessment. The Inspectorate notes that AONBs were rebranded on 22 November 2023 and should now be referred to as National Landscapes.	National Landscapes are referred to throughout the ES.
3.6.2	6.6.9	Landscape character areas (LCA) in the Aylesbury Landscape Character Assessment, other than those listed in paragraph 6.6.8 - all phases	The Scoping Report states that, other than the LCAs listed at paragraph 6.6.8 which are scoped into the assessment, there would be limited intervisibility between the Proposed Development site and any other LCAs. It is stated that detailed ZTVs would be presented in the ES to demonstrate this. The Inspectorate notes that Figure 5b in Appendix I of the Scoping Report Appendices indicates that there	The landscape and visual impact assessment including ZTV is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures in **ES Volume 3 [EN010158/APP/6.3].** Updated ZTVs are presented in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3]**. The removal of Solar PV modules from Parcel 1a as part of the

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			would be visibility with LCA 8.1 (Marsh Gibbon Vale), but this is not proposed to be scoped in. For LCAs other than LCA 8.1, the Inspectorate agrees that these receptors can be scoped out of the ES; however, the ZTV should be reviewed with the final Proposed Development and presented in the ES to demonstrate that there is no intervisibility. LCA 8.1 should be included in the ES assessments, or it should otherwise be explained why significant effects are not likely to occur to this LCA.	final Proposed Development has reduced potential visibility to LCA 8.1. Although the ZTVs indicate some theoretical visibility of the Proposed Development within LCA 8.1, site work has established that the Proposed Development would not be discernible from within this character area and there would therefore be no likely significant effects.
3.6.3	6.6.9	Areas of Attractive Landscape (AALs) within the 5km study area, other than Quainton-Wing Hill AAL - all phases	The Scoping Report states that there would be minimal visibility between the Proposed Development site and any other AALs. It is stated that detailed ZTVs would be presented in the ES to demonstrate this. The Inspectorate agrees that these receptors can be scoped out of further assessment; however, the ZTV should be reviewed with the final Proposed Development and presented in the ES to demonstrate that there is no intervisibility.	The landscape and visual impact assessment including ZTV is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3].** Updated ZTVs, based on the final Proposed Development, are presented in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3]**. The ZTVs indicate some theoretical visibility of the Proposed Development within AAL 4 – Brill-Winchendon Hills over 5km to the south and Local Landscape Area 10 – Poundon Hill over 4.5km to the west. However, site work has established that the Proposed Development would not be discernible from

ID	Ref	Description	Inspectorate's comment	Applicant's response
				any location within these landscape areas and there would therefore be no likely significant effects.
3.6.4	6.6.9	Registered parks and gardens within the 5km study area, other than Claydon House and Garden - all phases	The Scoping Report states that there would be limited visibility from Waddesdon Manor and Wotton Underwood Registered Park to the Proposed Development site. This is indicated on Figures 5b and 6 of Scoping Report Appendix I, through the ZTV. It is stated that detailed ZTVs would be presented in the ES to demonstrate this. The Applicant is referred to the Inspectorate's comments in Section 3.4 of this Scoping Opinion. The Inspectorate considers that there is potential for LSE to visual receptors at Waddesdon Manor and Wotton Underwood Registered Park. The ES should include an assessment of this matter or information demonstrating absence of LSE and agreement with relevant consultation bodies. If mitigation is relied upon to exclude LSE, then it should be fully described in the ES.	The locations of Registered Parks and Gardens is presented in **ES Volume 3, Figures 10.1 [EN010158/APP/6.3]** with updated ZTVs, based on the final Proposed Development in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3].** The ZTVs indicate some theoretical visibility of the Proposed Development with Waddesdon Manor and Wooton Underwood RPG over 4.5km to the south. However, site work has established that the Proposed Development would not be discernible and there would therefore be no likely significant effects. As reported in **Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]** it was agreed with Buckinghamshire Council that any potential effects during operation (including maintenance) would not be significant and these receptors could be scoped out.
3.6.5	6.6.9	Villages/hamlets of Twyford, Hillesden,	The Scoping Report states that the ZTVs contained in Scoping Report Appendix I indicate that there would	The locations of settlements is presented in **ES Volume 3, Figures 10.1**

ID	Ref	Description	Inspectorate's comment	Applicant's response
		Padbury, Adstock, Addington, Swanburn, North Marston, Oving, Calvert, Waddeston, Westcott, Edgcott, Marsh Gibbon, Poundon, Calvert, Middle Claydon, Charndon and Quainton - all phases	be some distant visibility from the edge of these villages but once intervening hedgerows and vegetation are taken into account it is highly unlikely there would be views of the Proposed Development. It is stated that any glimpses would be distant, filtered and negligible. The Inspectorate notes that the ZTVs do appear to indicate for most of the listed villages/hamlets that there is limited intervisibility with the Proposed Development but the text on the figures is difficult to read when zoomed in. The ES should include ZTVs which clearly demonstrate limited intervisibility for each village/hamlet. Otherwise, the potential impacts on views and visual amenity within the ZTV should be assessed where significant effects are likely to occur.	**[EN010158/APP/6.3]** with updated ZTVs, based on the final Proposed Development in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3]**. These ZTVs indicate some theoretical visibility of the Proposed Development within the majority of these settlements. However, with the exception of North Marston and Oving, site work has established that the Proposed Development would not be discernible, and the residents of settlements would not experience likely significant effects.
3.6.6	6.6.9	Public Rights of Way (PRoW) and local roads beyond the 5km study area during all phases	The Scoping Report states that it is unlikely that there would be views of the Proposed Development at this distance and any glimpses would not likely result in effects that would reach the threshold of a significant effect. The Inspectorate agrees that these receptors can be scoped out of further assessment; however, the ZTV should be reviewed according to the final Proposed Development parameters and presented in the ES to demonstrate that there is no intervisibility.	Updated ZTVs, based on the final Proposed Development, are presented in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3].** They indicate some theoretical visibility of the Proposed Development with PRoW and local roads beyond 5km of the Site, however site work has established that intervening local landform and/or layered field boundary vegetation would largely screen any such

ID	Ref	Description	Inspectorate's comment	Applicant's response
				views and they would not experience any likely significant effects.
3.6.7	6.6.9	Users of the rail network, specifically HS2 and East West Rail during all phases	The Scoping Report states that receptors would be of medium/low sensitivity and would have limited intermittent views of activity during all phases of the Proposed Development. It is stated that the potential for significant effects to occur is considered low. Paragraph 6.5.5 states that the line of HS2 is likely to be screened by landform and vegetation. The Inspectorate agrees that these receptors can be scoped out of further assessment on the basis presented in the Scoping Report; however, the ZTV should be reviewed using the final Proposed Development parameters and presented in the ES to demonstrate that there is limited intervisibility.	Updated ZTVs based on the final Proposed Development, are presented in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3].** They indicate some theoretical visibility of the Proposed Development for users of both East West Rail and HS2. Users of East West Rail have been scoped into the LVIA as they will have potential views of Solar PV modules within Parcel 1. Following the removal of Solar PV modules from Parcel 1a, the potential for even short-lived views for users of HS2 has been substantially reduced. Site work has established that the Proposed Development would likely not be discernible for users of HS2 who would pass to the south of the site in cutting and would not experience likely significant effects.
3.6.8	6.6.2	Study area	The Inspectorate notes that the ZTVs contained in Scoping Report Appendix I show potential visibility beyond 5km and it is unclear if there are sensitive landscape and visual receptors outside of the 5km	The updated ZTVs based on the final Proposed Development presented in **ES Volume 3, Figures 10.7 to 10.12 [EN010158/APP/6.3]** incorporate a 6km

ID	Ref	Description	Inspectorate's comment	Applicant's response
			buffer area that could be subject to LSE. The final extent of the study area, and the methodology for the ZTV used to inform its selection, should be determined in consultation with the relevant local authorities. Evidence of consultation should be provided in the ES.	study area to include potentially sensitive receptors to the south of the Order Limits as agreed with Buckinghamshire Council and reported in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]**.
3.6.9	6.5.5 and Appendix I, Figure 5a	Landscape Character Types (LCTs)	Paragraph 6.6.5 of the Scoping Report states that the Aylesbury Vale LCA identifies a series of LCTs, which are further subdivided into LCAs. Paragraph 6.6.8 identifies the LCAs that are proposed to be scoped into the assessment but makes no reference to LCTs. For the avoidance of doubt, LCTs should also be assessed in the ES where significant effects are likely to occur. The ES should include a justification for scoping out any LCTs within the study area, together with evidence of agreement to this approach by relevant consultation bodies. The Scoping Report states that LCTs within the study area are shown on Figure 5a in Scoping Report Appendix I. LCTs are not shown on this figure. The ES should include figures to illustrate baseline conditions of relevance to the assessment.	The LCTs and LCAs within the study area are presented in **ES Volume 3, Figure 10.4 [EN010158/APP/6.3]**. LCTs and LCAs are assessed in the landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** as agreed with Buckinghamshire Council and reported in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]**.
3.6.10	6.6.6	Lighting	The Applicant is referred to the Inspectorate's comments above at ID 2.2.2 of this Scoping Opinion. An assessment of external lighting on landscape and	A detailed description of the construction and operational lighting design is presented in **ES Volume 1, Chapter 3: Proposed**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			visual receptors should be undertaken in the ES where significant effects are likely to occur.	**Development Description [EN010158/APP/6.1]**. There would be no permanent lighting during construction and decommissioning stages. Emergency exits may need to be permanently lit during operation, however, these will be discrete and minimal and in compliance with health and safety standards. An assessment accounting for lighting during the operational stage has been considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** as agreed with Buckinghamshire Council and reported in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]**.
3.6.11	6.6.6	Outline Landscape and Ecological Mitigation Plan	The Scoping Report commits to submission of an oLEMP with the DCO application. The oLEMP should confirm the establishment period proposed for mitigation planting, together with any monitoring requirements and how these would be reported. It should consider potential for vegetation planting to be affected by climate change and/or any easements restricting the location of planting. Any assumptions	Assessment assumptions with regard to growth rates and heights of newly planted hedgerows and trees are presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. The same assumptions regarding hedgerow and tree heights are used in the preparation of the photomontages presented in **ES**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			made about the height that proposed mitigation planting would have reached by the assessment years should be clearly presented and justified for the purposes of generating photomontages and reaching assessment conclusions.	**Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**. The establishment period for mitigation planting, together with monitoring requirements is included in the **Outline LEMP [EN010158/APP/7.6]**. The **Outline LEMP** includes a Management Objective to 'Design for resilience and adaptation to future climate change', which requires the detailed landscape design to contribute to a betterment water runoff rates and to use species that are resilient to climate change and foreseeable pasts and diseases. Detail in relation to easements that may restrict planting has been incorporated within the plans appended to the **Outline LEMP** as far as currently know, but will be considered in further detail when detailed planting plans are prepared to discharge Requirements.
3.6.12	6.6.6	Embedded mitigation	The Scoping Report states that a high quality design will be secured through careful site selection of components. Where the avoidance of a LSE is reliant on embedded mitigation, this should be described in the ES along with the proposed methods by which delivery would be secured, assisted by a plan or figures where appropriate. The Inspectorate considers	The embedded mitigation is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures in **ES Volume 3 [EN010158/APP/6.3]**. This includes reference to the method by which the embedded mitigation is secured, which is

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			that a clear benchmark should be established within the ES as the basis for implementation of design mitigation with consideration given to relevant local and national guidance and policies.	generally the **Outline LEMP [EN010158/APP/7.6]** or the **Design Commitments [EN010158/APP/5.9]** for landscape and visual mitigation. The assessment includes evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors through the process of design development and consideration of good design principles. The approach to good design, including project specific design principles, is set out in the **Design Approach Document [EN010158/APP/5.9]**, which also includes consideration of the design of the Proposed Development against the criteria in Annex A to the Planning Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice on Good Design'.
3.6.13	6.6.6	Mitigation and enhancement	The Scoping Report refers to the landscape design seeking to deliver landscape enhancements above the requirement to mitigate adverse effects. The Inspectorate welcomes this commitment but advises that there should be clear differentiation in the ES and other application documentation between mitigation and enhancement proposals.	The landscape and visual impact assessment is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]**. The assessment differentiates between mitigation and enhancement whilst also

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				noting that these parameters are not mutually exclusive.
3.6.14	6.6.11	Viewpoint locations	The Scoping Report states that a selection of viewpoints will be used in the assessment to consider effects on different receptor groups at various distances from the Proposed Development. The viewpoint locations have not yet been determined but it is stated that these would be agreed with relevant consultation bodies. The Inspectorate advises that the ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoint selection. Where any disagreement remains, an explanation as to how the final selection was made should be provided. Viewpoint locations should be identified on a plan within the ES. Baseline viewpoint photography for summer and winter should be provided. The Applicant's attention is drawn to the consultation response of BC (Appendix 2 of this Scoping Opinion), which identifies several suggested viewpoint locations.	The viewpoints within the study area are presented in **ES Volume 3, Figure 10.6 [EN010158/APP/6.3]** with further information on their selection and visualisation types provided in **ES Volume 4, Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria [EN010158/APP/6.4]**. The locations of viewpoints have taken into account consultations with National Trust, Historic England and Buckinghamshire Council. As reported in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]** viewpoint locations have been agreed with Buckinghamshire Council. It was agreed with Buckinghamshire Council that only baseline winter photography would be included in order to provide a worst-case scenario for the assessment of effects. This is presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** and reported in **ES**

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				Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2].
3.6.15	6.6.11	Photomontages	The Scoping Report states that photomontages consistent with Type 3 or Type 4 visualisations as set out in the Landscape Institute's Technical Guidance Note 06/19 (TGN 06/19) will be presented for key viewpoints, which are to be determined though further consultation. The Inspectorate advises that the ES should include a justification for the final number and location of key viewpoints selected for photomontage. Effort should be made to agree these matters with relevant consultation bodies with evidence provided in the ES. The photomontages should be representative of the maximum visual envelope of the Proposed Development and include all components. Versions with and without proposed mitigation should be provided to enable the effectiveness of the mitigation to be understood.	The photomontages presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** are consistent with Type 3 visualisations as described in **ES Volume 4, Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria [EN010158/APP/6.4]**. The locations of visualisations in the LVIA have taken into account consultations with National Trust, Historic England and Buckinghamshire Council. As reported in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4]** visualisation locations have been agreed with Buckinghamshire Council. The visualisations demonstrate the maximal extents of the Proposed Development, include all relevant components and differentiate between views with and without mitigation as presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**.

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3.6.16	6.6.12	Difficulties and uncertainties	The Scoping Report states that there is some uncertainty about the extent of other proposed renewable energy and large-scale development in the study area. The Inspectorate advises that effort should be made to agree with relevant consultation bodies, including local authorities, a list of other developments that may give rise to potential significant cumulative effects, which should be considered in the cumulative effects assessment within the ES. The Applicant is referred to the Inspectorate's comments in Section 3.10 of this Scoping Opinion.	**ES Volume 3, Figure 17.2: Cumulative Short List Radius [EN010158/APP/6.3]** identifies the locations of cumulative developments and the distance from the Proposed Development which was agreed with Buckinghamshire Council.
3.6.17	6.6.13	References	The Inspectorate notes that the Landscape Institute published a draft TGN, 'Notes and Clarifications on aspects of the 3rd edition of the Guidelines on Landscape and Visual Impact Assessment (GLVIA3)', in May 2023. The ES should reflect any updated guidance of relevance in this note (and any subsequent version published).	The landscape and visual impact assessment including ZTV is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures in **ES Volume 3 [EN010158/APP/6.3]**. The assessment reflects the latest version of all relevant guidance including TGN 'Notes & clarifications on aspects of GLVIA3'.
3.6.18	Figures 5a and 5b,	Northamptonshire Vales LCA	Figures 5a and 5b show an additional LCA called Northamptonshire Vales LCA, within the Oxfordshire Landscape Character Area, which is on the edge of	Updated ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** and although they indicate some theoretical

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	Appendix I of Scoping Report Appendices		the 5km study area. This LCA is not referenced in paragraphs 6.6.8 - 6.6.9 so it is unclear whether effects on it are proposed to be scoped in or out of the assessment. The ES should include an assessment of effects to the Northamptonshire Vales LCA, or information demonstrating absence of LSE and agreement with relevant consultation bodies. If mitigation is relied upon to exclude LSE, then it should be fully described in the ES.	visibility of the Proposed Development within the LCA at distances over 5km from the Site, site work has established that the Proposed Development would not be discernible from any location within the Northamptonshire Vales LCA. During consultation South Oxfordshire District Council had no comments to make in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** and these receptors have been scoped out of the assessment.
3.6.19	N/A	National Character Areas (NCAs)	Paragraph 6.6.5 of the Scoping Report describes that the Proposed Development would be located within NCA 108: Upper Thames Clay Vales. This NCA is not referenced in paragraphs 6.6.8 - 6.6.9 so it is unclear whether effects to it are proposed to be scoped in or out of the assessment. The ES should include an assessment of effects to NCAs, or information demonstrating absence of LSE and agreement with relevant consultation bodies. If mitigation is relied upon to exclude LSE, then it should be fully described in the ES. The Applicant's attention is drawn to the consultation response of NE (Appendix 2 of this Scoping Opinion) in this regard.	The landscape and visual impact assessment including ZTV is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]**. During consultation with Buckinghamshire Council, it was agreed that the assessment would include the NCA 108: Upper Thames Clay Vales on the basis of a precautionary approach, "*even if it* [the assessment] *ultimately demonstrates a limited effect*." As a result, **ES Volume 4, Appendix 10.2: Extracts from published Landscape Character Assessments** references NCA

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				108 and the LVIA chapter provides an analysis of the likely effects.
3.6.20	N/A	Other landscape areas and sensitive views	The Scoping Report states that the assessment will draw on published landscape character assessments including the Steeple Claydon and Quainton Neighbourhood Plans and the emerging Local Plan for BC. If these documents identify any receptors located within the study area of the Proposed Development, the ES should include an assessment of effects on them or information demonstrating absence of LSE and agreement with relevant consultation bodies. If mitigation is relied upon to exclude LSE, then it should be fully described in the ES. The Applicant's attention is drawn to the consultation response of BC (Appendix 2 of this Scoping Opinion) in this regard.	The landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** references all relevant Neighbourhood and Local Plans. The assessment includes all relevant receptors identified in Appendix 2 of the Scoping opinion.
Noise and Vibration				
3.7.1	6.7.9	Operational vibration	The Scoping Report proposes to scope out this matter on the basis that levels of vibration associated with the solar PV modules and BESS during the operational phase will be low and unlikely to be perceptible at the nearest residential dwelling. Based on the nature and characteristics of the Proposed Development, the Inspectorate agrees that operational vibration may be scoped out of further assessment. The ES project	This has been noted. The project description included in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** sets out the type of operational plant and equipment and **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** provides further justification on the distance to

ID	Ref	Description	Inspectorate's comment	Applicant's response
			description should demonstrate that operational plant and equipment is of a type that does not generate a perceptible level of vibration or is to be used in locations unlikely to result in significant vibration impacts on both human and ecological sensitive receptors.	receptors and the unlikelihood of significant effects.
3.7.2	6.7.9	Operational road traffic noise	The Scoping Report proposes to scope out an assessment of noise associated with operational traffic on the basis that once operational the Proposed Development would generate minimal traffic. Considering the characteristics of the Proposed Development, the Inspectorate is content that this matter can be scoped out of further assessment. The ES project description should confirm the anticipated trip generation (including number and type of vehicles) required for routine maintenance during operation to justify this approach.	Increase in road traffic during the operation (including maintenance) phase will be negligible, with vehicles likely to be required for routine maintenance on the facility which would be significantly below the levels of road traffic during the construction phase. This matter is scoped out of the assessment, as detailed within **ES Volume 4, Appendix 5: EIA Scoping Report [EN010158/APP/6.4]** and confirmed within **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]**. The anticipated trip generation (including number and type of vehicles) required for routine maintenance during operation to justify this approach is included in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.7.3	6.7.3	Sensitive receptors	The Inspectorate notes that a baseline noise monitoring exercise is proposed at representative noise sensitive receptors with the locations to be agreed with BC. The ES should explain how the baseline noise monitoring locations were chosen with reference to relevant information including noise contour mapping.	Refer to **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** for an overview of the baseline noise monitoring locations which also provides a summary of the consultation with Buckinghamshire Council who accepted the survey approach (including the monitoring locations) Baseline noise monitoring locations were chosen to represent the nearest noise sensitive receptors to the Proposed Development. These are shown in **ES Volume 3, Figure 13.2: Baseline Survey Locations [EN010158/APP/6.2]** and noise contour mapping is presented in **ES Volume 3, Figures 13.3 and 13.4: Operational Phase Noise Contours [EN010158/APP/6.2]**.
3.7.4	6.7.5	Baseline conditions	The Scoping Report states that due to the proximity of HS2 to the proposed site the baseline conditions will be influenced by the ongoing construction works and the future baselines will be influenced by the operation of high speed trains associated with HS2. The ES should describe any construction activities for HS2 and/or any other relevant ongoing projects that would affect the baseline conditions and explain how it	Further detail is set out in the future baseline section in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** Where the baseline noise measurements were influenced by HS2 construction works, this is set out in **ES Volume 4, Appendix 13.1: Baseline Noise Survey [EN010158/APP/6.4]**. In instances where

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			is ensured that the data collected is representative to inform the baseline conditions. For the future baselines the ES should explain how the noise and vibration effects from the operation of high speed trains associated with HS2 and/or other relevant projects have been considered.	this occurred, the measured noise levels were still noted be low and it has therefore not dictated the significance criteria adopted for the noise assessment, as set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2].** The noise and vibration effects from the operation of high speed trains associated with HS2 and / or other relevant projects have been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].** Following the implementation of suitable additional mitigation measures, the intra-project combined effect is considered to be not significant.
3.7.5	N/A	Receptor locations and mapping	The ES should provide a plan showing the location of all sensitive receptors identified for assessment overlayed with noise contour mapping to aid understanding of the potential for significant effects relating to noise.	The noise study area and receptors are identified in **ES Volume 3, Figure 13.1: Study Area and Receptors [EN010158/APP/6.2]** and noise contour mapping is presented in **ES Volume 3, Figures 13.3, 13,4 and 13.5: Operational Phase Noise Contours [EN010158/APP/6.2]**.
Transport and Access				

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.8.1	6.8.9	Operational traffic	The Scoping Report states that the effect of operational traffic is likely to be minimal (up to two van trips per day). On the basis of the low anticipated operational traffic volumes, the Inspectorate is content to scope this matter out from further assessment. The ES description of development should clearly set out the operational vehicle types and numbers (with reference to relevant thresholds within guidance) to justify this position.	The anticipated trip generation (including number and type of vehicles) for the operational (including maintenance) phase is detailed in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2],** paragraphs 15.6.21 and 15.6.22.
3.8.2	6.8.9	Decommissioning traffic	The Scoping Report proposes to scope out effects during the decommissioning phase since the traffic movements are anticipated to be fewer than the construction phase as elements of the Proposed Development, such as an improved junction and some access tracks, may be retained for future agricultural/land uses. Furthermore, it is considered that the decommissioning phase is too far in the future to be able to ascertain the future baseline. It is proposed to produce a Decommissioning Traffic Management Plan to protect the future road authority's interests and to ensure the safe movement of all road users at that time, which will be secured by a DCO requirement. On the basis of the above information, the Inspectorate is content to scope this matter out of further assessment.	**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** confirms in paragraph 15.6.23 that a Decommissioning Traffic Management Plan will be produced prior to decommissioning works commencing, secured by a requirement to the DCO either as a stand-alone document or as an appendix to the Decommissioning Environmental Management Plan.

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.8.3	6.8.2	Study area	The ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. In addition to agreement with the local highway authority, consideration should also be given to industry guidance and the extent of the potential impacts and likely receptors, both human and ecological. A plan illustrating the extent of the study area, the expected route(s) of construction traffic and the anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES.	The Applicant confirms that all matters listed in the Inspectorate's comment have been considered and incorporated. Please refer to **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2],**Section 4.4 and Figure 3 of **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** for details on the study area determination and extents. Details relating to the traffic generation are provided in Chapter 5 of **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4].**
3.8.4	6.8.3	PRoW surveys	Scoping Report paragraph 6.9.5 states that there are numerous PRoW crossing the site and continuing beyond the site boundary in various directions connecting surrounding settlements. Paragraph 6.8.3 states that data from BC's PRoW 'Interactive map' will be used to inform the baseline characterisation but no surveys are proposed to understand the baseline use of these PRoW. The Inspectorate advises that surveys should be undertaken to provide baseline data in relation to the use of the PRoW affected by the Proposed Development. The Inspectorate notes that walkers, cyclists and horse-riders (WCH) and PRoW are scoped into the	The effects on PRoW users are considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** with respect to access and movement matters which include severance of communities, pedestrian delay, non-motorised user amenity and fear and intimidation. Use surveys of the PRoW were not undertaken as the increase in potential traffic effects would be of significance when compared to the baseline case, negating the need for baseline data.

ID	Ref	Description	Inspectorate's comment	Applicant's response
			assessment within the Population chapter. It is unclear whether impacts on PRoW will be assessed fully in the ES Transport and Access or Population chapter. The ES should assess impacts to PRoW and on WCH receptors from the Proposed Development where significant effects are likely to occur and clearly signpost where this is addressed in the ES.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** assesses effects on community access (walkers, cyclists and horse riders (WCH), considering the ability for people to continue to use PRoW for recreational and connectivity purposes, in order to access commercial, recreational, community facilities and social networks and to undertake recreational active travel. These effects are distinct from effects related to users of PRoW that are assessed within **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** as described above. Effects on community access within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** are also distinct from effects related to changes in environmental amenity experienced by users of PRoW which are considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**.
3.8.5	6.8.1 and 6.8.6	Abnormal Indivisible Loads (AIL)	Paragraph 6.8.1 indicates that consultation on the route(s) for AIL access will be undertaken with the statutory structure and road agencies via the Department for Transport (DfT) Electronic Service	Consultation using the ESDAL contacts has been undertaken and is reported in the Route Survey Report, appended as Annex 3 to **ES Volume 4, Appendix 15.1:**

ID	Ref	Description	Inspectorate's comment	Applicant's response
			Delivery for Abnormal Loads (ESDAL) system. The impacts on safety from the use of AILs should be assessed within the ES. Appropriate measures to ensure safe transportation of hazardous loads should be included within the Framework Abnormal Load Transport Management Plan.	**Transport Assessment [EN010158/APP/6.4]**. Chapter 5 of the **Outline CTMP [EN010158/APP/7.5]** sets out measures that are considered to be required with respect to the safe movement of the abnormal loads, following a review of the access route. The Abnormal Indivisible Load Route Survey Report contained in Annex 3 of **Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** illustrates the detailed review of safe and efficient access to the site. No hazardous loads are associated with the Proposed Development.
Population				
3.9.1	Paragraph 6.9.8	Private property and housing Community land and assets Development land	The Scoping Report proposes to scope out impacts on private property and housing for all phases of the Proposed Development on the basis that there are no properties or houses at risk of demolition, none of the application site is allocated for residential development and no new planning applications have been submitted for housing development within the site boundary.	These matters were subsequently scoped into the EIA and are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**.

ID	Ref	Description	Inspectorate's comment	Applicant's response
			It is proposed to scope out impacts on private property and housing for all phases of the Proposed Development on the basis that it would cover a large area of privately owned agricultural land which is therefore land not used as community land and there are no community assets located within the application site boundary. It is proposed to scope out impacts on private property and housing for all phases of the Proposed Development on the basis that there is no land allocated for employment use or any planning applications yet to be determined that will generate employment opportunities at the application site. Paragraph 6.9.2 states that the study area to be used for this assessment will include all land within the site boundary and extend for 500m in all directions beyond it. Due to the lack of information provided about private property and housing, community land and assets and development land beyond the site boundary the Inspectorate considers that insufficient justification has been provided for scoping these matters out at this stage. Accordingly, the ES should include an assessment of these matters or evidence demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	

ID	Ref	Description	Inspectorate's comment	Applicant's response
3.9.2	6.9.6	PRoW - mitigation	It is stated that temporary diversions or closures of existing PRoW may be required during construction. Any temporary diversions will be detailed in an Outline PRoW Management Plan submitted with the DCO application, which will set out the "PRoW commitments" and any proposed changes to PRoW will be agreed in consultation with BC. Evidence of agreement with the Council should be included in the ES chapter. The chapter should clearly identify any PRoW that are proposed to be temporarily diverted or permanently stopped up and the proposed mitigation measures and contain explicit cross-reference to relevant information within the Outline PRoW Management Plan. The proposed mitigation must be secured in the DCO.	Effects on community access / walkers, cyclists and horse riders have been assessed within Sections 14.8 and 14.10 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2],** which includes a list of PRoW to be diverted during the construction phase for the duration of the operational phase. Where PRoWs are 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. The **Outline RoWAS [EN010158/APP/7.8]** confirms that paths that would be permanently closed and diverted would only be closed once their replacements have been completed and are fully open to the satisfaction of the Local Highway Authority. The **draft DCO [EN010158/APP/3.1]** includes the powers necessary to

ID	Ref	Description	Inspectorate's comment	Applicant's response
				temporarily close and manage public rights of way during construction (pursuant to Article 12 and as specified in Part 2 of Schedule 6), and to provide permanent diversions to existing public rights of way (which involves the permanent stopping up and creation of public rights of way) (pursuant to Article 13 and as specified in Part 1 of Schedule 6) and identify these by reference to the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]** where the powers are able to be exercised.
3.9.3	6.9.8	Effects on agricultural land holdings and businesses	The ES should assess the impacts during construction, operation and decommissioning of potential severance issues for farmers and other landowners and changes to long-term viability of farm holdings affected by the Proposed Development. Any LSE should be assessed and reported in the ES. Mitigation should be proposed for any significant effects identified and secured in the DCO. Measures should be included within the DCO, as necessary, to ensure farmers' and other landowners' ability to access and move their livestock and access their land is not hindered.	The Site includes landholdings for a number of agricultural and non-agricultural businesses. The circumstances of the individual businesses involved have been investigated via discussions with the landowners and tenants and direct discussions as appropriate up to finalisation of the application to inform the baseline position. The likely significant effects as a result of changes in access or environment for agricultural and non-agricultural landholdings have been considered within Sections 14.8 and 14.10 of **ES Volume 2,**

ID	Ref	Description	Inspectorate's comment	Applicant's response
				Chapter 14: Population [EN010158/APP/6.2]. This includes details of iterative scheme design in order to reduce or remove the potential for effects on operations which are set out in the **Design Approach Document [EN10158/APP/5.8]** and secured within the **Design Commitments [EN010158/APP/5.9]**. It also includes details of measures contained within the **OCEMP [EN010158/APP/7.2]** and **OCTMP [EN010158/APP/7.5].**
3.9.4	6.9.11	Methodology	The Inspectorate notes that a 'Socio-Economic Statement' will be submitted with the DCO application "..outside of the EIA process", which will contain information on the potential loss of permanent jobs, the creation of new temporary and permanent jobs and the effect on the local economy. An estimate of the number and types of jobs created should be provided in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. Consideration of potential impacts should include the availability of local accommodation and services. Significant effects should be assessed in the ES where they are likely to	These matters were subsequently scoped into the EIA and are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**.

ID	Ref	Description	Inspectorate's comment	Applicant's response
			occur. Explicit cross-reference should be made from the ES Population chapter to relevant information contained within the Socio-Economic Statement', as appropriate.	
Cumulative effects				
3.10.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment	This has been noted.
3.10.2	7.1.8	Intra-project effects assessment methodology	Scoping Report Appendix D does not set out clearly what level of effects are considered to be significant and not significant for the individual aspect assessments. The methodology should be clarified in the ES so that it can be understood how receptors will be selected for inclusion in the intra-project assessment.	The assessment of cumulative effects has been undertaken in line with Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024). The approach to the assessment, including the methodology which details the level of the effect is detailed in Section of **ES Volume 2, Chapters 6 to 16 [EN010158/APP/6.2].** The assessment of intra-project combined effects methodology is set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].**
3.10.3	N/A	Locations of the long and short list of projects	The ES should include information on the locations of the developments included in the cumulative effects assessment (CEA) and the distance from the Proposed Development. This should be supported by a figure depicting the locations and extent of	Table 17.3 in **ES Volume 2, Chapter 17: Cumulative Effects [EN101058/APP/6.2]** details the location of the developments considered in the cumulative effects assessment, the distance from the

ID	Ref	Description	Inspectorate's comment	Applicant's response
			cumulative developments in relation to the Proposed Development.	Proposed Development and the status of the application. **ES Volume 3, Figure 17.2: Cumulative Short List Radius [EN010158/APP/6.3]** illustrates the location of the developments that have been considered in the cumulative effects assessment.
3.10.4	N/A	Consultation	The Applicant should seek to agree the ZPI and the long list of projects for the CEA with relevant consultation bodies. Any omissions or inclusions should be clearly justified and explained with reference to PINS Advice Note 17: Cumulative effects assessment.	Agreement was reached with Buckinghamshire Council on the developments identified on the short list that will form part of the assessment and on the proposed cut-off date of 30 June 2025 for developments to form part of the short list. **ES Volume 4, Appendix 17.1: Long List of Other Approved and or Existing Developments [EN010158/APP/6.4]** sets out the justification for the omissions and inclusions that have been assessed within the cumulative effects assessment in line with Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024).
3.10.5	7.1.8	Long list criteria	The Inspectorate considers that the criteria for the selection of a long list of projects should also include those associated with rail infrastructure, given the location of the Proposed Development. The	This has been considered in the long-list criteria and both developments (HS2 and East West Rail (associated and ongoing works)) are included within the short list and

ID	Ref	Description	Inspectorate's comment	Applicant's response
			Inspectorate notes that the ZOI for the Proposed Development is likely to overlap with those of the adjacent works involved in HS2 or East West Rail which are indicated in the Scoping Report to be under construction, or those for which separate planning applications are required. The ES should explain the approach taken to these projects as either part of the future baseline and/or within the cumulative effects assessment with reasons given for the approach taken. This should include a description of how the projects may overlap spatially and/or temporally with Rosefield Solar Farm.	are considered within the cumulative effects assessment in the **ES Volume 2, Chapter 17: Cumulative Effects [EN101058/APP/6.2].** The chapter sets out the approach taken for each development considered in the cumulative effects assessment. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** also sets out how these developments have been taken into account in the future baseline for traffic flows. These developments form part of the cumulative effects assessment due to the ongoing nature of the work which has been verified by several ongoing planning applications and the uncertainty of when these works will be completed and any temporal overlap with the Proposed Development. This is considered a robust method of assessment to ensure that both developments are considered along with other cumulative developments in the area to ensure a worst-case assessment has been undertaken during all three phases (construction, operation (including

ID	Ref	Description	Inspectorate's comment	Applicant's response
				maintenance) and decommissioning) of Proposed Development.
3.10.6	7.1.24	Methodology - matric approach to CEA	The Inspectorate notes a reference to a matrix in Appendix 1 to the Scoping Report which has not been supplied. Where a matrix approach is taken in the ES to identify projects and the reasons for their inclusion or exclusion this should be supported by appropriate evidence and consultation with the relevant consultation bodies.	The methodology for identifying projects that form part of the long and short list has been undertaken in line with the criteria set out in the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024) and the short list agreed with Buckinghamshire Council. Further detail on the approach to the cumulative effects assessment is detailed within **ES Volume 2, Chapter 17: Cumulative Effects [EN101058/APP/6.2]** and **ES Volume 4, Appendix 17.1: Long List of Other Approved and or Existing Developments [EN010158/APP/6.4]**.
3.10.7	N/A	Feedback on projects to be included	The Applicant is directed to responses from NE and BC for details of projects that should be included in the long list of sites for the cumulative and in-combination effects assessments.	This applicant has noted these responses and considered these within **ES Volume 4, Appendix 17.1: Long List of Other Approved and or Existing Developments [EN010158/.APP/6.4].**
3.10.8	N/A	Structure of ES	For the avoidance of doubt, the ES should include a CEA for all aspects scoped into the ES in accordance with this Scoping Opinion.	A cumulative assessment for all aspects scoped into the ES has been undertaken and is provided in **ES Volume 2, Chapter**

ID	Ref	Description	Inspectorate's comment	Applicant's response
				17: Cumulative Effects [EN101058/APP/6.2].

2. EIA Scoping Opinion Response Matrix – Consultation Bodies

ID	Ref	Description	Consultee's comment	Applicant's response
Anglian Water				
1	Appendix 2 p.82	Existing infrastructure	There are existing Anglian Water assets including wastewater network assets and water mains within the identified site area and in roads and areas serving communities within the cable route. The promoter at 2.3.41 confirms the presence of 'water and sewer utilities' from a desked based study. Only the Sub- station land and a small area of the north west corner of the site at Addison Road are within existing wastewater catchment areas. The substation is served by the Winslow Wastewater Recycling Centre (WRC) which also serves the villages to Botolph Claydon and Granborough. Addison Road is within the Steeple Claydon WRC catchment which also serves the village of Calvert. The rising main serving the substation and East Claydon is 150mm in diameter and the starting point for the standoff distance is 4 (four) metres. The rising main which crosses and runs alongside Addison Road is 250mm in diameter and so the starting point for its standoff distance is 5 (five) metres. The water mains along East	Noted. Existing utilities have been taken into consideration and can be seen on **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3]**. Geophysical surveys have not identified any other Anglian Water assets (see **ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4]**. The Applicant and Anglian Water Services have engaged extensively throughout the pre-application period to discuss and put in place agreements for all interfaces as detailed in the **Draft Statement of Common Ground - Anglian Water Services Ltd [EN010158/APP/5.16]**. This includes agreements on future investigations to verify asset locations and protective provisions for their apparatus. In any event, the Applicant has included standard water and sewerage protective provisions in the **Draft DCO [EN010158/APP/3.1]** submitted with the Application. Discussions with Anglian Water Services will continue throughout the project so any changes to

ID	Ref	Description	Consultee's comment	Applicant's response
			Claydon Road to the west of the Sub-Station and south of the village at Orchard Way are 225mm and so have a 4 (four) metre standoff for works. All other water mains including those serving the Claydon Estate and between Calvert and Steeple Claydon on Addison Road are 225mm or less and so also have a 4 (four) metre standoff. These standoff distances are set out in the template Protective Provisions provided to the promoter. Due to HS2 works in the area the status, size and location of Anglian Water pipes is still changing and so we advise the promoter to use geophysical survey work undertaken for archaeological investigation in pre-application is used to inform future ground investigations which will locate Anglian Water assets prior to construction works in that area. The stated standoff buffers set out in the Protective Provisions may then be revised in consulting with Anglian Water's network teams following necessary ground investigations. Anglian Water would want to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure, are identified, and protected. To reduce the need for diversions and the	asset locations can be understood and reflected in the final design of the Proposed Development. Due to the nature of the site the foul flows in these phases of the project are likely to be small and as such a package treatment works may be a viable approach with ultimate discharge towards a drainage field or the local ditch/watercourse network (if required via a field drain). The drainage arrangement for permanent welfare facilities is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11]**. The site will require provision for domestic foul drainage. Due to rural nature of the site connection to foul sewer may not be feasible although this will be reviewed, as such the 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, inspected and drained through a licensed carrier who would dispose of the waste offsite.

ID	Ref	Description	Consultee's comment	Applicant's response
			associated carbon impacts of those works, ground investigations would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure. We welcome the intention at 2.3.41 to consider utilities 'in ongoing design development'. We welcome the intention to produce a Construction Environment Management Plan (CEMP) (6.1.6)) and Construction Traffic Management Plan (2.4.81) and these should include steps to remove the risk of damage to Anglian Water assets from plant and machinery (compaction and vibration during the construction phase) including haul and access roads and crossings (if any).	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. The **Outline CEMP [EN010158/APP/7.2]** and **Outline CTMP [EN010158/APP/7.5]** sets out steps to mitigate any risk to Anglian Water assets.
2	Appendix 2 p.83	Flood risk, drainage and surface water	We would advise that in accordance with the drainage hierarchy, surface water should first look to be managed by Sustainable Drainage Systems (SuDS) and note that SuDS are mentioned (5.9.37 and 5.9.42) and with reference to pollution prevention. From our engagement with the promoter, we understand that there is no intention to seek to connection to the public sewer for the construction or	Due to the nature of the site the foul flows in these phases of the project are likely to be small and as such a package treatment works may be a viable approach with ultimate discharge towards a drainage field or the local ditch/watercourse network (if required via a field drain). The drainage arrangement for permanent welfare facilities is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11]**. The site will

ID	Ref	Description	Consultee's comment	Applicant's response
			operational phase. This is how we read 5.9.28 and 5.9.38. In view of 5.9.29 though we would welcome confirmation that the design of drainage system for the substation (2.4.66) will be a self- contained system that utilises SuDS for surface water management and rainwater harvesting for non-potable uses (page 60) during construction and then operation. The tanker off option for any non-recycled waste water (page 59) is the option that we understand the promoter prefers and given the proximity of connection is likely to be the least carbon intensive solution for the project. Anglian Water would welcome the non-inclusion of provisions in the draft Development Consent Order (DCO) which would allow for a right of connection to the public sewer. In view of the guidance in the National Policy Statements we would welcome reference to in the scoping to water supply and water resources (3.2.4, 4.1.3, 5.8.4, 5.9.10, 5.9.30 and 6.5.5, page 118) Anglian Water requests that these points are assessed early in the EIA process and design iteration to set out how the project will be supplied with water given the statement at 5.9.39. and 5.9.40.	require provision for domestic foul drainage. Due to rural nature of the site connection to foul sewer may not be feasible although this will be reviewed, as such the 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, 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.

ID	Ref	Description	Consultee's comment	Applicant's response
3	Appendix 2 p.84	Water resources	The site within the Ruthamford South Water Resource Zone (WRZ) and specifically the Steeple Claydon Distribution Management Area. We note that whilst the scoping considers water environment impacts it does not look at impacts on water resources. As the site is within an area designated by the Environment Agency as 'seriously water stressed' and water may be used in the project construction and operation, this indicates that water resources should be assessed in the EIA. Given the current desk-based study of utilities we understand why there is no reference to assessment of the carbon costs of relocating water infrastructure if assets are impacted during construction or operation. Anglian Water notes that the applicant has in part sought to scope these matters out by providing a desk-based assessment looking at the scale of use but without reference to the availability of water. On the basis that no connection is sought by the promoter for water during construction and operation then this may be a reasonable conclusion. We would advise though that experience in servicing the water demands of HS2 illustrates the need for these matters to be considered in the EIA at an early	Water is now scoped into the Environmental Statement and is assessed in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. The Applicant and Anglian Water Services have engaged extensively throughout the pre-application period to discuss and put in place agreements for all interfaces as detailed in the **Draft Statement of Common Ground - Anglian Water Services Ltd [EN010158/APP/5.16]**. Anglian Water mains water supply would be used at permanent facilities for potable water if available during construction, operation and decommissioning works. Potable water can be supplied to temporary welfare facilities via water bowsers if required. Waste/Foul water discharge during the Construction and Decommissioning phases of the Proposed Development could be achieved through two possible disposal options: a potential connection to the local foul sewer network. Or alternatively the foul/waste 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 foul/waste water discharge offsite. Waste/Foul water

ID	Ref	Description	Consultee's comment	Applicant's response
			stage and design in or designed out of the project. In the area Anglian Water now advise that new non household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth. The flows needed to fill water storage tanks for example (in the event that the promoter decides not to use rainwater harvesting on site to meet this non potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost. Our new position on non- household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. If the promoter elects to seek a public water supply, they will need to submit a water resources assessment setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. Water use during construction means that the promoter will need to confirm that concrete production, for example, would be offsite and so	discharge during the pre-commencement and operation phases of the Proposed Development would have significantly lower volumes than those collected during the construction and decommissioning phases due to the amount of workers on Site. During these phases of the project the foul/waste water discharge could be achieved through the same options as discussed in Section 3.14.24 of **ES Volume 1, Chapter 3: Description of the Proposed Development [EN010158/APP/6.1]** but also through a potential third option of a package treatment works located within the vicinity of the Rosefield Substation, BESS and Collector Compound. Due to the nature of the Site the foul flows in these phases of the project are likely to be small and as such a package treatment works may be a viable approach with ultimate discharge towards a drainage field or the local ditch/watercourse network (if required via a field drain). High level potable and foul water volumes have been provided to Anglian Water for review and due to the Proposed Development being an NSIP application there may be increased scope for water supply and disposal from Anglian Water. Should Anglian Water think the initial volumes provided could be acceptable then a water

ID	Ref	Description	Consultee's comment	Applicant's response
			not require an on-site supply. Further advice on water and wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at: planningliasion@anglianwater.co.uk	resources assessment would be submitted through the formal application process as has previously been discussed during recent stakeholder meetings.
4	Appendix 2 p.84	Engagement	Anglian Water welcome the early instigation of discussions with RDF Renewables as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. On the basis that fuller consideration of water supply and water recycling matters does identify resources, assets and services may be impacted by the project we would recommend further discussion on the following issues: 1. Impact of development on Anglian Water's assets and the need for mitigation 2. The design of the project to minimise interaction with Anglian Water assets/critical infrastructure and specifically to avoid the need for diversions which have associated carbon costs	The Applicant and Anglian Water Services have engaged extensively throughout the pre-application period to discuss and put in place agreements for all interfaces as detailed in the **Draft Statement of Common Ground - Anglian Water Services Ltd [EN010158/APP/5.16]**. This includes agreements on future investigations to verify asset locations and protective provisions for their apparatus. In any event, the Applicant has included standard water and sewerage protective provisions in the **Draft DCO [EN010158/APP/3.1]** submitted with the Application. Discussions with Anglian Water Services will continue throughout the project so any changes to asset locations can be understood and reflected in the final design of the Proposed Development. Engagement is also detailed within the **Consultation Report [EN010158/APP/5.1]** and in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			3. Requirement for potable and raw water supplies 4. Requirement for water recycling (surface water/foul drainage) connections 5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects 6. Draft Protective Provisions (a template has been previously provided to the promoter) Please do not hesitate to contact us should you require clarification on the above response or during the pre- application to decision stages of the project.	
Berkshire Buckinghamshire and Oxfordshire Wildlife Trust				
1	p. 1	Overview	To Whom it may concern, RE: Scoping consultation for Rosefield Solar Farm BBOWT is a local nature conservation charity, and as such our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval. BBOWT strongly oppose the proposed location of Rosefield Solar Farm. The area is one of the best remaining ecologically important	Noted. The Applicant fully recognises the importance of habitats and species and this has been reflected in the design of the Proposed Development and the assessment undertaken within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Cumulative effects with East West Rail and High Speed Two and other projects are carefully considered within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. .

ID	Ref	Description	Consultee's comment	Applicant's response
			landscapes in southern England. It is nationally important for rare habitats and species, such as wildflower meadows, hairstreak butterflies, bats and ancient woodland. The area is already under huge pressure from infrastructure projects including East West Rail and High Speed Two, which intersect just to the north-west of the proposed project area. The size and scale of the solar farm, measuring a staggering 875.47 ha, is inappropriate for this area, and whilst BBOWT understand the need for sustainable renewable energy, green spaces should not be the first-choice location for solar panels, instead siting them on buildings such as warehouse roofs.	
2	p. 1	Comments on the content of the EIA Scoping Report	We are pleased to see that Biodiversity is proposed to be scoped into the Environmental Statement (ES). However, we are concerned that most receptors are being scoped out of the assessment at this early stage prior to appropriate consideration within the ES chapter. For example, whilst statutory designated sites have been scoped into the assessment, the seven Local Wildlife Sites (LWS) which are adjacent to the proposals, have been scoped out. It is our view that the site is in a highly sensitive area for ecology, with potential impacts on nearby designated sites of great importance	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The approach to scoping is in compliance with the Planning Inspectorate's Scoping Opinion, where all matters required to be scoped in have been scoped in (including the Local Wildlife Sites that are located adjacent to the Order Limits) and assessed. Matters scoped out of the assessment are generally those that will be avoided and are not expected to be affected by the Proposed Development. Detailed justification for scoping out of receptors has been provided in the ES.

ID	Ref	Description	Consultee's comment	Applicant's response
			to wildlife, hosting numerous priority habitats and species, and therefore it is essential that all ecology receptors are scoped in and assessed within the Biodiversity Chapter within the ES.	
2	p. 2	Comments on the content of the EIA Scoping Report	We are concerned that the cabling areas have not been surveyed thus far and therefore the potential impacts to biodiversity have not been assessed as a result of the cabling works. The Scoping Report states that '*The dimensions of the trenches will vary… up to approximately 16 m in width and generally down to approximately 1.5 m in depth*' and that '*open-cut trenching methods would be used for a majority of cable routing*'. The trenching works have the potential to destroy a range of habitats along their route and directly impact species such as reptiles and great crested newts which may be killed or injured during the trenching works. To not include baseline surveys for all areas which could be impacted by cabling works is a major omission.	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The cable route corridor has been refined significantly 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 the cable works will be a short-term temporary impact, surveys have been decided upon to be proportionate to this impact given that the assessment for the majority of ecological receptors has determined that there will either be no significant impact given proposed mitigation to negate impacts. The embedded mitigation detailed in **Table 7.6** and secured by the **Outline LEMP [EN010158/APP/7.6]** includes a minimum standoff distance from Solar PV modules and associated infrastructure of 10m from ponds and ditches. As a result, there will be no direct loss of GCN breeding habitat and it is not envisaged that construction activities are likely to have a direct adverse impact upon these habitats. Terrestrial

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				habitat suitable for GCN would be temporarily impacted during the Interconnecting Cable Corridor works, Grid Connection Cable Corridor works, Site access location works, and Construction Compound works. The impacts would be short term and limited to the duration of the construction phase. As the construction is phased, impacts would only occur within discrete areas within the Order Limits at any one time. Permanent terrestrial habitat loss would occur as a result of Internal Access Corridor works and permanent infrastructure works, e.g., Satellite Collector Compound and Rosefield Substation. Construction activities that require vegetation and ground clearance works carry a risk of causing incidental injury or mortality to GCN during the construction phase. Works with the potential to affect GCN would be carried out either under the Buckinghamshire District Level Licensing Scheme through NatureSpace Partnership or under a European Protected Species licence from Natural England. The licensable works would encompass clearance, and construction works required within the intermediate and distant habitat zones of ponds (likely up to 250m) within the Order Limits. The embedded mitigation includes the creation and improvement of species-rich grassland,

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				scrub, ponds, hedgerows, arable field margins and woodland, resulting in an increase of habitat suitable to support GCN across the Site. The majority of habitat within the Order Limits is considered to be of low suitability for reptile species. Limited areas of habitat suitable for reptiles would be temporarily impacted during the Interconnecting Cable Corridor works, Grid Connection Cable Corridor works, Site access location works, and Construction Compound works. The impacts would be short term and limited to the duration of the construction phase. As the construction is phased, impacts would only occur within discrete areas within the Order Limits at any one time. Permanent habitat loss would occur as a result of Internal Access Corridor works and permanent infrastructure works, e.g., Satellite Collector Compound and Rosefield Substation. Construction activities that require vegetation and ground clearance works carries a risk of causing incidental injury or mortality to reptiles during the construction phase. Any vegetation clearance or ground clearance proposed within areas of habitat suitable for reptiles will be undertaken in a phased manner under method statement supervised by a suitably qualified ecologist.

ID	Ref	Description	Consultee's comment	Applicant's response
3	p. 2	Comments on the content of the EIA Scoping Report	In addition to this, BBOWT consider baseline surveys for some receptors in Parcels 1-3 to be insufficient or lacking. Section 6.2.2 of the Scoping Report states that the survey study area for badgers comprises the entire site. However, badger surveys must extend to at least 30 m outside of the site boundary as there may be setts outside the boundary of the site which could be impacted by the proposals.	Badger surveys were undertaken in 2022 (**ES Volume 4, Confidential Appendix 7.6: Badger Survey Report 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Confidential Appendix 7.15: Badger Survey Report 2025 [EN010158/APP/6.4]**). This included all land within the Site and up to 30m where access allowed. Pre-construction badger surveys would be undertaken to identity any new setts with appropriate buffers maintained from all setts. All known, and any newly discovered, badger setts will be retained with an appropriate buffer (minimum 30m) from all aspects of the Proposed Development.
4	p. 2	Comments on the content of the EIA Scoping Report	Furthermore, no surveys have been undertaken for invertebrates. In particular, searches for black and brown hairstreak butterfly eggs should be undertaken given the importance of this area for these species and the potential impact to hedgerows, scrub and woodland edges which support blackthorn- the egg laying habitat for these species. It is also noted that there are areas of standing and fallen deadwood throughout the site. Given the proximity of ancient woodland with veteran trees and deadwood resource, it is highly likely that these	A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). This included assessment of habitats suitable to support notable and protected invertebrate species. The majority of the habitats present were considered likely to support a common assemblage of invertebrate species, typical of arable field margins, hedgerows,

ID	Ref	Description	Consultee's comment	Applicant's response
			areas within the site could support an important saproxylic invertebrate assemblage and surveys should be undertaken to understand the assemblage present on site and the potential impacts the proposals could have.	woodland and scrub and grassland habitats. However, Blackthorn, the food source for black and brown hairstreak caterpillar which is a species included as a SSSI citation feature, was recorded abundantly across the site within hedgerows and woodland area. In addition, survey works undertaken by Natural England in support of the proposed Bernwood SSSI have identified the presence of black hairstreak butterfly in close proximity to the proposed Development, therefore we can assume presence within the Order Limits where Blackthorn is present. Areas of woodland that support Blackthorn within the development boundary will be retained entirely, whilst hedgerows that support Blackthorn will be mostly retained in their entirety, although up to 1,310m of permanent hedgerow removal may be required to facilitate access or underground cabling. Targeted surveys of sections of hedgerow that will require removal will 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. This approach has been agreed with Natural England.

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				There is not expected to be an overall loss of suitable habitat for these species as hedgerows will 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]**). UKHab surveys and hedgerow surveys were undertaken as part of **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]** to assess their value using the ecological criteria for 'Important Hedgerows'. The majority of hedgerows would be protected from construction works. There will 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. There will be a minimum 10m offset from the fence line to all other existing hedgerows. However, a number of hedgerows would need to be crossed by the Grid

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				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. Details of lengths of hedgerow removal proposed is shown in the **Outline LEMP, Appendix 3: Vegetation Removal Parameters [EN010158/APP/7.6]**. New hedgerow planting will be implemented across the Site. Measures to minimise the impact of construction activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]** and **Outline LEMP [EN010158/APP/7.6]**. 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 will 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]**). 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

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				ancient woodland and 20m from other woodland habitat.
5	p. 2	Comments on the content of the EIA Scoping Report	Some baseline assessments have not been provided within the appendices of the scoping report, namely: - Badger survey - Bat preliminary roost assessment - Bat activity - River condition assessment survey It is not clear why these have been omitted and by not including them shows that the applicant is not being fully transparent with the application and has resulted in consultees not being able to fully assess the potential impacts of the proposals at this stage of the consultation process.	Full baseline surveys have now been completed as reported in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated appendices **[EN010158/APP/6.4]**: • Badger survey undertaken December 2021-March 2022 (see ES Volume 4, Appendix 7.6: Badger Survey Report (2022) – Confidential [EN010158/APP/6.4]); • Badger survey 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**]); • Bat preliminary roost assessment undertaken in March 2022 (see **ES Volume 4, Appendix 7.2: Bat Preliminary Roost Assessment Report (2022) [EN010158/APP/6.4]**); • Bat Preliminary Roost Assessment surveys undertaken in November-December 2024, January 2025 and April 2025 (see **ES Volume 4, Appendix 7.14: Bat Preliminary Roost**

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				Assessment Report (2025) [EN010158/APP/6.4]); • Bat activity surveys undertaken July 2022-September 2023 (see **ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4]**); • Paired static detector surveys undertaken in October 2024 and May 2025 (see **ES Volume 4, Appendix 7.16: Paired Static Bat Detector Survey Report (2025) [EN010158/APP/6.4]**); and • A river condition assessment was undertaken in September 2023 of the Claydon Brook and connected tributaries located adjacent to the boundary of Parcel 3, and in April 2025 of small watercourse was recorded on the northern boundary of Parcel 1a and the northeast corner of Parcel 1. Details of the survey results and assessment are included in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment (2025)** It is normal practice to redact any information pertaining to the presence and location of badgers due to the risk of persecution. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**

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				includes confidential badger survey reports to support the assessment undertaken for badgers. Bat survey effort was agreed with Natural England. In addition to the results of bat surveys undertaken for the Proposed Development, Natural England's 'The Bernwood Population of Bechstein's Bats' (2024) was also used to infirm the assessment.
6	p. 2	Comments on the content of the EIA Scoping Report	BBOWT feel that some of the primary mitigation measures outlined in Table 4-1 are insufficient. The minimum offset of 20 m to Ancient Woodland and to statutorily and locally designated wildlife sites (which in this instance are all Ancient Woodland) is not considered to be adequate to prevent degrading impacts of the solar farm on the functioning of woodland ecosystems and the species which depend on them. Whilst the woodlands are outside of the site boundary, to locate a solar farm in such close proximity as is proposed is inappropriate, with the risk of fragmentation and loss of ecological connections between the woodlands and the wider natural landscape. The Woodland Trust in 2019 published guidance for Ancient Woodland which states '*a minimum 50 metre buffer should be maintained between a*	Embedded mitigation measures relevant to biodiversity are detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2 Table 7.6** and secured by the **Outline LEMP [EN010158/APP/7.6]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated appendices **[EN010158/APP/6.4]** 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. The assessment of impacts to ecological receptors has informed the location and type of proposed mitigation that is incorporated within the Proposed Development design and layout to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and

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			development and the ancient woodland'. There has been no justification provided as to why a smaller buffer would suffice in this instance, and indeed a buffer larger than 50m may be required unless it can be demonstrated that there will not be significant disturbance.	connectivity is maintained with links to the wider landscape. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** identifies the location of and recognises the importance of all woodland blocks. The embedded mitigation measures include for the retention of all statutory and locally designated wildlife sites and ancient woodland with a minimum 30m offset from the fence line. 30m is over and above what is required to protect tree root protection area (RPA) of woodlands. Standing advice (Natural England and Forestry Commission (2022) Guidance: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions) recommends a buffer zone of at least 15m from the boundary of ancient woodland to avoid root damage. This is detailed in and secured by the **Design Commitments [EN010158/APP/5.9], 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]**.
7	p. 3	BBOWTs objections to the proposals	The proposed solar farm has the potential for adverse effects on sites designated for nature conservation. The proposal lies adjacent to	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices

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		Impacts on designated natured conservation sites and irreplaceable ancient woodland habitats	numerous blocks of ancient woodland, which are either Sites of Special Scientific Interest (SSSI) or Local Wildlife Sites (LWS): - Finemere Wood SSSI and BBOWT Nature Reserve - Sheephouse Wood SSSI - Runts Wood LWS - Balmore Wood LWS - Greatsea Wood LWS - Romer Wood LWS - Home Wood, Middle Claydon LWS - Shrubs Wood LWS - Decoypond Wood LWS These woodlands are prime relics of Bernwood Forest and are well-structured with woodland rides and high species diversity, supporting unique and complex ecological communities. They are irreplaceable habitats. Finemere Wood SSSI, for example, supports rich communities of native plants, bats, birds, insects and other animals, many of which may be vulnerable to impact from a large solar farm being placed in close proximity. The proposed development site, whilst for the most part is arable and pasture land, remains a semi-permeable landscape for the wildlife which reside in these woodlands and many fields retain some diversity and good	**[EN010158/APP/6.4]** identify and assess effects upon all relevant designated sites and ancient woodland locations (which includes those sites listed by BBOWT) including, where applicable, identifying where the Proposed Development layout has avoided these areas. It 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. Full justification for scoping out any ecological receptors is also provided. The assessment of impacts to ecological receptors has informed the location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape. The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date. The Proposed Development has been designed to ensure the retention and protection of all designated sites and ancient woodland, other woodland area, ancient and veteran trees, ponds, watercourses, ditches and the majority of hedgerows and arable field margins within the Order Limits. Loss of

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			habitat to support a range of species. The building of vast swathes of solar arrays surrounded by fencing threatens to fragment and isolate the woodlands and many of the species within them, and result in the deterioration of these ecosystems. These areas should be improved for connectivity and link the woodlands by developing semi-natural habitats between them. As such, BBOWT unreservedly opposes development of a solar farm in close proximity to these protected sites.	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 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. 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 will create a coherent ecological network that will link 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 will 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

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				grassland will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support GCN. In addition, these habitats will also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. 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 (Natural England (2024) The Bernwood Population of Bechstein's Bats) indicate the importance of the woodland resource for Bechstein's bat. This provides confidence that the approach to the Proposed Development design and mitigation is appropriate. During the operation (including maintenance) phase, potential effects on bat species will be monitored to assess the efficacy of mitigation measures and contribute to the evidence base pertaining to the impacts of solar development on bat species.

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8	p. 3	BBOWTs objections to the proposals Impacts on designated natured conservation sites and irreplaceable ancient woodland habitats	National and local policy as well as published evidence, as outlined below, all supports the notion that any development should avoid protected sites and proposals should be refused. NPPF paragraph 180 states: "*When determining planning applications, local planning authorities should apply the following principles:* *(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;* *(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted…* *(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused…* Policy NE1: Biodiversity and Geodiversity, Vale of Aylesbury Local Plan 2013-2033 states: "*Development proposals that would lead to an*	Noted. The biodiversity assessment in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken in line with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024). National and local policy as well as published evidence is considered in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, the compliance of the Proposed Development against relevant nature conservation planning policies is presented in the **Planning Statement [EN010158/APP/5.7]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant designated sites and ancient woodland locations including, where applicable, identifying where the Proposed Development layout has avoided these areas. It considers all potential impact pathways and assesses any impacts arising from the Proposed Development which are likely to result in significant effects on

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			individual or cumulative adverse impact on an internationally or nationally important Protected Site or species, such as SSSIs or irreplaceable habitats such as ancient woodland or ancient trees, will be refused unless exceptional circumstances can be demonstrated" And: "*e. Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance (such as Local Wildlife Sites or Local Geological Sites) including habitats of principal importance (known as Priority Habitats) or the habitats of species of principal importance (Priority Species) or their habitats will not be permitted except in exceptional circumstances*" In addition, a report written by BSG Ecology (2019) states: "*2.56 Publications by Natural England recommend the avoidance of solar developments in or near to areas of high ecological value or designated sites, and highlight how planning applications can often be rejected based on the ecology of the proposed site*." A Natural England (2017) review states: "*When considering site selection for utility scale solar developments it is generally agreed that*	ecological receptors. Full justification for scoping out any ecological receptors is also provided. The assessment of impacts to ecological receptors has informed the location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape. The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date. The Proposed Development has been designed to ensure the retention and protection of all designated sites and ancient woodland, other woodland area, ancient and veteran trees, 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 limited value to biodiversity in comparison to retained habitats of higher value, with infrastructure located to avoid more ecologically

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			protected areas should be avoided. This is reflected in the scientific literature where modelling approaches include many factors such as economic considerations and visual impact but also often avoid protected areas such as SPAs. This is echoed by organisations such as Natural England and the RSPB that recommend that solar PV developments should not be built on or near protected areas."	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. 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 will create a coherent ecological network that will link 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 will 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 will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support GCN. In addition, these habitats will also be of benefit to species including invertebrates, amphibians, reptiles, non-

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				ground nesting birds, roosting bats, badger and otter. 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 (Natural England (2024) The Bernwood Population of Bechstein's Bats) indicate the importance of the woodland resource for Bechstein's bat. This provides confidence that the approach to the Proposed Development design and mitigation is appropriate. During the operation (including maintenance) phase, potential effects on bat species will be monitored to assess the efficacy of mitigation measures and contribute to the evidence base pertaining to the impacts of solar development on bat species.
9	p. 4	Impacts on priority habitat and protected and priority species	The wider landscape in which the proposed solar farm is sited is of huge importance to bat populations with the woodlands supporting a nationally important bat assemblage. They contain remnant populations of rare and notable species including Bechstein's, Brandt's,	Consultation has been undertaken with Natural England to agree the survey study area extent and types of surveys required to inform the assessment for bats and discuss how land affected by the Proposed Development will impact foraging, commuting and roosting bat species.

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			whiskered and barbastelle bats. The Bechstein's bats of Bernwood are geographically isolated from, and less genetically diverse than other populations in England (Wright et al 2018) so work on habitat connectivity is needed. Therefore Bechstein's, and the other species of bat this area supports, could be seriously impacted from further development in this region and the further fragmentation and isolation of their populations within the different ancient woodland blocks. The hedgerows and surrounding habitats are also of paramount importance to the bats in the area for commuting and foraging, with a number of bat species also using the open fields. We are seriously concerned that important bat habitats and populations will be fragmented and that the solar panels themselves will also deter bats from using their natural habitat. New research by Tinsley et al (2023) has shown that the activity level of bats is substantially lower at solar farm sites compared to control sites. Furthermore, Barré and Baudouin et al (2023) report on a reduction in feeding behaviour and therefore likely reduced feeding habitat quality for bats at solar farms. The causes for this are unknown and further research must be carried out. It is	This has informed the comprehensive assessment of all stages of the Proposed Development presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, which has been prepared in collaboration with a leading UK bat specialist. The available literature (including the studies cited here by BBOWT), while indicating the potential for negative impacts on bats, represents only an initial foray into an area of research that has been poorly explored to date. To date there are only a handful of studies on this topic which rely on limited datasets and compare separate control and solar farm sites, of varying levels of comparability, rather than considering variations in bat activity pre- and post- solar farm development on the same site. As such, there remain considerable uncertainties in the nature and/or extent of any negative impact including in relation to the root causes or variations in response between different bat species, which has been taken into account in the assessment. Bat survey information is provided in **ES Volume 4, Appendix 7.2: Bat Preliminary Roost Assessment Report [EN010158/APP/6.4]** and

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			possible this could be related to loss of suitable habitat, fewer insect prey available, impacts on echolocation, and collision risk with the panels.	**Volume 4, Appendix 7.10: Bat Activity Survey Report [EN010158/APP/6.4]**. The results of the assessment have informed proposed mitigation measures to prevent significant effects on the ecological network. The Proposed Development includes a buffer from panels to boundary features including hedgerows and woodland, along with significant areas of dedicated mitigation that 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 will create a coherent ecological network that will link the Site to the wider landscape, reducing fragmentation across the wider landscape and supporting the movement of local wildlife, particularly bats. 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. indicate the importance of the woodland resource for Bechstein's bat. This provides confidence that the approach to the Proposed Development

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				design and mitigation is appropriate. During the operation (including maintenance) phase, potential effects on bat species will be monitored to assess the efficacy of mitigation measures and contribute to the evidence base pertaining to the impacts of solar development on bat species. Measures outlined in the **Outline CEMP [EN010149/APP/7.2]** and **Outline DEMP [EN010149/APP/7.4]** are proposed to safeguard hedgerow and woodland.
10	p. 5	Impacts on priority habitat and protected and priority species	BBOWT are concerned that farmland birds will be negatively impacted by the proposals, particularly ground nesting birds such as skylark. Huge areas of breeding habitat for the species are proposed to be covered in solar arrays, likely having a significant impact on the population in the area. Indeed, in the report titled 'Report on surveys for breeding birds' by AECOM (2022), it is stated that a total of 34 breeding territories of skylark were identified across the scheme area. Skylark are a Species of Principal Importance and a red list species, which has experienced a significant reduction in their population since the 1970's. The likely loss of most, if not all, of this species breeding territories at the site is unacceptable.	As set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, breeding and wintering bird surveys have been completed to inform the assessment of impacts on avian species, including skylark, lapwing, golden plover and snipe. These are reported in full in **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report 2022 [EN010158/APP/6.4], ES Volume 4, Appendix 7.11: Wintering Bird Survey Report 2024 [EN010158/APP/6.4], 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].** We recognise that bird surveys represent a snapshot in time, and not all species will

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			The area is also of importance for wintering birds such as lapwing and golden plover, which gather in large open arable fields. The report 'Wintering Bird Survey Report' by AECOM (2022) concludes that "*Species diversity for the Site is of county importance and, individually, Sites 1 and 2 support an assemblage of wintering birds which may be of importance at a district level*." As such, the loss of this habitat could have a large impact on local bird populations. On a species level, a peak count of 144 snipe, an amber list species, was recorded which is likely to represent a significant proportion of the county population, with the population of Snipe recorded on site being of at least district importance. A peak count of 96 lapwing, a red listed species and Local Biodiversity Action Plan Species was also recorded. The loss of large swathes of habitat for wintering bird populations is of real concern.	necessarily be recorded as birds are highly mobile especially during the winter months. However, the level of survey effort completed is sufficiently robust to assess potential impacts on the avian assemblages and determine the mitigation to be included within the Proposed Development design to offset potential significant adverse impacts.
11	p. 5	Impacts on priority habitat and protected and priority species	The 'lake effect' of solar panels is a further concern, particularly with the proximity of water bodies such as at Calvert Jubilee LWS and BBOWT nature reserve, Calvert Brick Pits LWS, Claydon House, the upper River Ray and numerous streams and ponds. There is evidence to suggest that large expanses of solar panels	The risk of the lake effect and other impacts concerned with light polarisation have been fully assessed within the ecological assessment but important to note that modern Solar PV modules; however, have anti-reflective coatings intended to minimise light polarisation and thereby reduce the type of effects that have been cited. In addition,

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			may mimic the water surface and this may pose a risk to birds, bats and invertebrates. A Natural England (2011) Technical Information Note states: "*Solar parks can affect wildlife where they are near sites of high wildlife value…. There are some indications that very large, unbroken expanses of uniform solar panels may mimic water surfaces on which insects may attempt to settle and breed……. Some birds and invertebrates are also likely to be affected by solar parks developed close to areas of high wildlife value. Where a solar park is proposed within or close to such sensitive sites, the planning application should include a detailed assessment of the likely impacts on the ecological interest of the sites and contain practical measures which avoid or minimise any adverse effects on their features of interest. Any solar park close to a designated site will need to demonstrate that it would not compromise the objectives of the designation*." Possible impacts of the 'lake effect' include: a) birds mistaking a large area of solar panels to be a lake and attempt to land on them. For some water birds this could be critical since they struggle or are unable to take off from non-water surfaces;	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. 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).

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			b) birds and bats that feed on the wing mistakenly attempting to feed from the panels, with possible collisions and mortality; c) low-flying birds colliding with the panels or being confused by reflections in the same way as birds are confused by reflections from windows of buildings, and colliding with the panels, resulting in mortality; d) attraction of aquatic insects to the panels. • A Natural England (2017) evidence review states: "*Photovoltaic panels have been shown to reflect polarised light that is attractive to polarotactic aquatic insects, which confuse solar panels with water and attempt to lay eggs on the surface, resulting in mortality and reproductive failure*"; • A review by BSG Ecology (2019) describes in paragraphs 2.8 – 2.10 research into the possible impact of solar farms on aquatic invertebrates. It concludes by saying that: "*The authors suggest that, until more research on a variety of species has been carried out, a more sensible approach would be the strategic deployment of solar panels away from waterbodies in temperate regions*."	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. 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 will 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. However, it should be noted that there

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				are no notable 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. 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). In 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

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				the availability of perching opportunities on the solar panels. At the Proposed Development, the creation of species-rich grassland will provide ground-nesting bird habitat and create a nectar source for invertebrates, which in turn provides a foraging resource for bird species. A mosaic of scrub and grassland will improve foraging habitat for a range of bird species and provide habitat to support invertebrates which gain will improve foraging resources for birds. Research by scientists 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. With regards the lake effect, it might be expected that such an effect would pose the greatest risk to migratory waterbirds, however, there is no evidence to directly support the 'lake effect' (Kosciuch, K., Riser-Espinoza, D., Gerringer, M.,

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				& Erickson, W. (2020).). 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.
12	p. 6	Further concerns and conclusions on the impacts of the proposals	In addition to BBOWT's concerns on the location of the proposals on wildlife and habitats, the site is also entirely located within the Bernwood Biodiversity Opportunity Area (BOA), identified as being of Regional Importance. BOAs are local ecological networks, established by the Buckinghamshire and Milton Keynes Biodiversity Partnership. BOAs are considered to be the most important areas for wildlife conservation in Buckinghamshire and Milton Keynes where targeted conservation action will have the greatest benefit. The main aim within BOAs is to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of Biodiversity Action Plan (BAP) priority habitats. BOAs provide a key focus for delivery of the Forward to 2030: Biodiversity Action Plan for Buckinghamshire and Milton Keynes. We believe the proposals jeopardize the achievement of the aims of the BOA. Policy NE1 in the Vale of Aylesbury Local Plan states "*i. Development which would prevent the aims of a Biodiversity*	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 impacts and measures to protect the ecological network and contribute to the aims of the BOA. The assessment provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes an assessment of direct and indirect effects of the Proposed Development on non-statutory designated sites within/adjacent to the Order Limits including Bernwood BOA, and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. 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

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			Opportunity Area from being achieved will not be permitted."	Proposed Development upon biodiversity as detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.
13	p. 6	Further concerns and conclusions on the impacts of the proposals	As previously mentioned, the lines for East West Rail (EWR) and High Speed Two (HS2) intersect just to the north west of the proposed solar farm location. The construction of these rail lines, HS2 in particular, have put huge scars across and fragmented this landscape, and caused untold harm on wildlife and habitats. The cumulative effects of these with another major infrastructure project of a solar farm would be colossal. We need to be striving for ways to repair the harm already caused and reconnect this fragile landscape, not adding to the destruction and devastation caused.	An assessment of the cumulative effects of the Proposed Development with other projects, including EWR and HS2, is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
14	p. 6	Further concerns and conclusions on the impacts of the proposals	A Natural England (2017) review states at the end of its Conclusion: "*The lack of evidence available relating to the ecological impact of solar farms is concerning….. more needs to be done to understand the interaction between these new technologies and the ecology that they are ultimately designed to protect*." The BSG Ecology (2019) review states in conclusion:	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant habitats and species including full baseline surveys. The Applicant was mindful from the outset of the presence of statutory designated sites. It was considered that any potential impacts on these sites could be mitigated through direct avoidance

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			"*2.58 In order to minimise the impacts of solar farms on biodiversity, the literature comes to a general consensus that: a. Consideration should be given to the correct siting of solar farms within the landscape*." We consider that there is as yet simply not yet enough evidence that a solar farm can be installed in such close proximity to a wildlife site of such high value without harm being caused to certain species. We consider that the precautionary principle comes into action, and that this application should not be permitted in this location.	and no development is proposed within statutory and non-statutory designated sites. Further detailed design measures, including the use of setbacks from development, mitigation planting and screening were considered appropriate to further mitigate potential impacts (see **Planning Statement, Appendix 1: Site Selection Report [EN010158/APP/5.7]**). The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date. The Proposed Development has also been designed to ensure the retention and protection of all other areas of 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 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

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				have been reserved for ecological mitigations and enhancements and are not available for renewable infrastructure. The ES includes an assessment of impacts to ecological receptors which has informed the location and type of mitigation that is incorporated into the Proposed Development to maintain ecological functionality and connectivity to the wider landscape.
15	p. 7	Mitigation and enhancement measures	We are very disappointed by the proposed early design. The 'potential main areas for landscape and/or ecological enhancements' are woefully small for the size of the proposals and are quite clearly located in areas where solar panels cannot be positioned and/or where a visual buffer is required to existing development. No efforts have been made to site ecological enhancements in areas which are suitable and would be of benefit for ecological connectivity and resilience. BBOWT object to the proposed solar farm, however in order to achieve the best outcomes for wildlife we are providing our expectations for what should be provided for wildlife within the proposals below.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant habitats and species including full baseline surveys. The ES includes an assessment of impacts to ecological receptors which has informed the location and type of mitigation that is incorporated into the Proposed Development to maintain ecological functionality and connectivity to the wider landscape. The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date, with significant updates to

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				mitigation proposals occurring since the Scoping stage. The Proposed Development has been designed to ensure the retention and protection of all designated sites and ancient woodland, other woodland area, ancient and veteran trees, 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 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. 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

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				arable margins along with scrub and tree planting. This will create a coherent ecological network that will link 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 will 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 will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support GCN. In addition, these habitats will also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. 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 (Natural England (2024) The Bernwood Population of Bechstein's Bats**)** indicate the importance of the woodland resource for

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				Bechstein's bat. This provides confidence that the approach to the Proposed Development design and mitigation is appropriate. During the operation (including maintenance) phase, potential effects on bat species will be monitored to assess the efficacy of mitigation measures and contribute to the evidence base pertaining to the impacts of solar development on bat species.
16	p. 7	Mitigation and enhancement measures	It is imperative that a detailed report on mitigating impact on the SSSI's, LWS's and Ancient Woodlands adjacent to and in close vicinity of the proposals (including Calvert Jubilee LWS, Calvert Brick Pits LWS and Grendon and Doddershall Woods SSSI) and the species that use the sites is provided. Such a request is supported by a Natural England Technical Information Note (2011) which states: "*Where a solar park is proposed within or close to such sensitive sites, the planning application should include a detailed assessment of the likely impacts on the ecological interest of the sites and contain practical measures which avoid or minimise any adverse effects on their features of interest. Any solar park close to a designated site will need to demonstrate that it would not compromise the objectives of the designation*."	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant designated sites including, where applicable, identifying where the Proposed Development layout has avoided these areas, as detailed within the embedded mitigation measures 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]**. It 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 scoped into the assessment which BBOWT requested. Full justification for scoping out any ecological receptors is also provided. The assessment of impacts to ecological receptors has informed the

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				location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape.
17	p. 7	Mitigation and enhancement measures	Measures to reduce the likelihood of some of the issues referred to in this response should be provided, such as 1) reducing polarised light from the solar panels, and 2) reducing the density of the solar panels, by widening the corridors between the panels, so as to reduce any resemblance to a lake, and the intensity of the polarised light issues. Some measures are set out in the BSG Ecology (2019) review. There are coating measures available to reduce polarised light from panels, and the affixing of white grid patterns on each panel to break up the reflections from panels to reduce the chance of attraction to wildlife. Whilst we do not consider that these will remove the risk to wildlife they could reduce the risk.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant designated sites, habitats and species including, where applicable, identifying where the Proposed Development layout has avoided these areas. PV modules will be bifacial with an anti-reflective coating to reduce polarised light impacts (see **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**). Further information regarding Solar PV module design will be included at detailed design stage following DCO submission. The Solar PV density across the Order Limits has been reduced by reducing the Solar PV module area from 449 ha at the Phase One consultation stage to 279 ha at the Phase Two consultation stage, equating to an area reduction of 37.7% across the whole Site. Where key areas of bat activity, in particular

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				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. Instead, these fields will be used to provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity. Mitigation measures are secured in the **Design Commitments [EN010158/APP/5.9]**, **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline LEMP [EN010158/APP/7.6]**).
18	p. 7	Mitigation and enhancement measures	Hedgerows should be retained and enhanced. In exceptional circumstances if proposals involve removal of small sections of hedgerow for access purposes, then a substantially longer section of hedgerow should be planted elsewhere on site to provide compensation. A management regime should be put in place for hedgerows across the site including a three-year rotation for trimming and allowing some stretches of hedgerow to remain untrimmed for longer.	The majority of hedgerows (over 96%) would be retained and protected from construction works. There will 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. There will be a minimum 10m offset from the fence line to all other existing hedgerows. However, a number of hedgerows would need to be crossed by the Grid Connection Cable Corridor, Interconnecting Cable Corridors and Internal Access Corridors. Cable installation and highways

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			There should also be at least a 15m buffer between any development and the hedgerows. These buffers should be maintained as dark corridors and should be of appropriate semi-natural priority habitat such as a mosaic of scrub and species-rich grassland.	access proposals for visibility splays would also require sections of hedgerows to be removed. Details of lengths of hedgerow removal proposed is shown in the **Outline LEMP, Appendix 3: Vegetation Removal Parameters [EN010158/APP/7.6]**. New hedgerow planting will be implemented across the Site. Measures to minimise the impact of construction activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]** and **Outline LEMP [EN010158/APP/7.6]**. 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 will 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]**). The lighting design would use directional fittings facing away from woodland and hedgerow boundaries and into the Order Limits (see **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP**

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				[EN010158/APP/7.3] and **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 Operational Environmental Management Plan [EN010158/APP/7.3]**.
19	p. 7	Mitigation and enhancement measures	Large buffer zones of at least 50m must be included around the woodlands, but better still no panels should be located in proximity to the ancient woodlands, and the habitats in-between should be enhanced to improve the connectivity between the woodland areas. Currently the woodland margins are abrupt to the neighbouring arable and pastureland. We would recommend that softer margins are created to form a habitat mosaic, with the inclusion of scrub and species-rich grassland with flowering species to create headlands between the woodlands.	The Applicant has designed the Proposed Development to retain all statutory and locally designated wildlife sites and ancient woodland with a minimum 30m offset from the fence line. There will also be a minimum 30m offset from the fence line to woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. The design includes for the retention of all other woodland habitat and HS2 mitigation planting with a minimum 20m offset from the fence line to all other existing areas of woodland and HS2 planting (see **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**) These buffers are over and above what is required to protect tree root protection area (RPA) of woodlands. Standing

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				advice from Natural England and Forestry Commission recommends a buffer zone of at least 15m from the boundary of ancient woodland to avoid root damage (Natural England and Forestry Commission (2022). Guidance: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions). Enhancement of field margins and boundary features is proposed to provide greater habitat connectivity and foraging/commuting opportunities for various species including bats, birds and invertebrates.
20	p. 8	Mitigation and enhancement measures	Ecological enhancements should also be widely spread across the impacted area to create 'stepping-stones' for wildlife to move uninterrupted across the landscape. This should include wide species rich field margins, enhancements to existing hedgerows and hedgerow creation, rough grassland and scrub creation, and the creation of scrapes, channels, ponds and wetland areas. Particular attention should be given to include habitats and plant species to benefit the local fauna and flora. For example: - Blackthorn scrub of differing ages to provide egg laying habitat for black and brown hairstreak	Considerable consideration has been given to ensure the design of the scheme protects and enhances wildlife corridors, with habitat creation proposals incorporated into the Proposed Development to maintain ecological functionality and connectivity to the wider landscape. 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, ditches through appropriate buffers. By creating species-rich grassland and arable margins along with scrub and tree planting within these buffers, this will

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			butterflies - Rough grassland of differing lengths to support small mammal populations and to provide good foraging grounds for barn owl and kestrel - Large areas left without panels for skylark plots - Tall, wide hedgerows with trees to improve commuting and foraging habitat for bats - Larval foodplants for woodland butterflies included within planting mixes, particularly around woodland edges - Ponds of differing sizes and depths with gradients within them, and the provision of different substrates within the ponds and species-rich wetland planting to provide habitat for reptiles, amphibians and invertebrates.	create a coherent ecological network that will link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. By creating species-rich grassland and arable margins along with scrub and tree planting. This will create a coherent ecological network that will link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland will 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 will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support great crested newts. In addition, these habitats will 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]). Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **Outline LEMP**

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				[EN010158/APP/7.6] and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**. The Proposed Development will 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.
21	p. 8	Mitigation and enhancement measures	BBOWT would expect to see clear details of how habitats will be monitored and managed in perpetuity.	Monitoring and management of habitats for the lifetime of the Proposed Development will be secured by the **Outline LEMP [EN010158/APP/7.6]** and through the biodiversity design which identifies how biodiversity net gain will be achieved (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). Ecological mitigation and enhancement areas would be handed over to the relevant landowners following decommissioning. Consultation with appropriate stakeholders and the landowner would be undertaken in advance of the decommissioning phase to discuss opportunities the land owner may wish to be undertaken to maintain and manage the ecological mitigation and enhancement beyond

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				the lifespan of the Proposed Development, as appropriate.
22	p. 8	Mitigation and enhancement measures	No information has yet been provided on what habitats would be provided between and beneath the solar panels, or whether a mixed-use approach would be taken, with the inclusion of grazing animals. Solar panels make typical grassland management techniques unsuitable and so clear detail on the planting and how this will be managed must be provided, with realistic targets. Conservation grazing in parts of the site should also be explored to provide varied habitats	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]**. Management of grassland within the Order Limits will 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 will be implemented. Long-term management will be secured by the **Outline LEMP [EN010158/APP/7.6]** and through a detailed biodiversity design which identifies how biodiversity net gain will be achieved (see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**).
23	p. 8	Achieving a net gain in biodiversity	NPPF paragraph 174 states: "Planning policies and decisions should contribute to and enhance the natural and local environment by…… d) minimising impacts on and providing net gains for biodiversity, including by establishing	The compliance of the Proposed Development against relevant nature conservation planning policies is presented in the **Planning Statement [EN010158/APP/5.7]**. A detailed biodiversity design has been developed which identifies how a minimum 10% net gain in biodiversity will be

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			coherent ecological networks that are more resilient to current and future pressures; NPPF paragraph 180 states: When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; …… d) …. opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate. Policy NE1: Biodiversity and Geodiversity, Vale of Aylesbury Local Plan 2013-2033 states: *Protection and enhancement of biodiversity and geodiversity will be achieved by the following:* c. *A net gain in biodiversity on minor and major developments will be sought by protecting, managing, enhancing and extending existing biodiversity resources, and by creating new biodiversity resources. These gains must be measurable using best practice in biodiversity*	achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory Biodiversity metric (see **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). **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]** however, 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 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.

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			and green infrastructure accounting and in accordance with any methodology (including a Biodiversity Impact Assessment) to be set out in the Buckinghamshire Biodiversity Accounting SPD. d. *If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then development will not be permitted. If a net loss in biodiversity is calculated, using a suitable Biodiversity Impact Assessment (see c) then avoidance, mitigation and compensation, on site first, then offsite must be sought so the development results in a net gain (percentage of net gain to meet any nationally-set minimum standard and or as detailed in an SPD) in order for development to be permitted. Mitigation, compensation and enhancement measures must be secured and should be maintained in perpetuity. These assessments must be undertaken in accordance with nationally-accepted standards and guidance (BS 8683 Biodiversity net gain in project design and construction; and CIRIA Biodiversity Net Gain Good practice principles for development).*	

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24	p. 9	Achieving a net gain in biodiversity	It is requirement of the Environment Act 2021 to ensure a minimum 10% net gain in biodiversity is delivered by all development, including Nationally Significant Infrastructure Projects. BBOWT would expect such an infrastructure project to be exemplary, delivering a 20% net gain in biodiversity and this evidenced through the use of the statutory biodiversity metric and an associated Biodiversity Impact Assessment, providing clear detail on condition assessments and proposed habitats and how these will be achieved and managed in perpetuity. The SPD mentioned in Policy NE1 above, Biodiversity Net Gain – Supplementary Planning Document, adopted July 2022, should be reviewed and followed. The following are suggested as key potential actions to achieve a net gain. Also, we consider that due to the serious potential risk if this proposal goes ahead to neighbouring sites of great wildlife value, then at the very least all of these should be implemented even if a metric could show an on-site net gain with less than the delivery of the below: a) Use of a species-rich wildflower meadow mix across the entire area where solar panels are to be installed, with	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). A biodiversity design has been developed which incorporates habitat proposals that BBOWT and other consultees have requested where possible along with biodiversity guidance for solar developments. The biodiversity design identifies how a minimum 10% net gain in biodiversity will be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric, and in fact, is expected to substantially exceed this. Although not yet mandatory for Nationally Significant Infrastructure Projects (such as the Proposed Development), the Applicant is still committing to achieving this as a minimum level of BNG, which will be secured by the **Outline LEMP [EN010158/APP/7.6]**. **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]** however, 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.

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			management by seasonal grazing (with stock taken off during April, May and June as a minimum, and with a hay cut between panels and removal of arisings in July) of an appropriate intensity so as to maintain a species-rich wildflower meadow beneath and between the panels and in the margins. b) Provision of wide wildflower-rich margins between the hedgerows and panels, with management of these also with seasonal grazing (with stock taken off during April, May and June as a minimum, and with a hay cut and removal of arisings in July) of an appropriate intensity so as to maintain a species-rich wildflower meadow. c) Management of the hedgerows so as to maximise their species-richness, including rotational cutting (in January or February) so that only one third of the hedgerows are cut in any year, with the result that any one section of hedgerow is only cut once in every three years. Such management will ensure provision of nectar-rich flowers in spring, and berries for birds in the winter. It should also increase the availability of bird nest sites.	The biodiversity design is cognisant of local biodiversity priorities already identified for the areas and 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.

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			If any gapping up of hedgerows is carried out, or if new hedgerows are planted, then a core blackthorn and hawthorn content, with a wide variety of native subsidiary species, will be of particular value. d) Management of any existing ponds for wildlife, and creation of additional pond/wetland features. Such measures would also be in line with the following, which we would recommend are consulted in drawing up the development design: BRE National Solar Centre – Biodiversity Guidance for Solar Developments http://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf Natural England Technical Information Note – TIN101 "Solar Parks – maximising environmental benefits" http://publications.naturalengland.org.uk/file/102004 National Pollinator Strategy https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/370199/pb14221-national-pollinator-strategy.pdf	
25	p. 10	Fencing	We note that paragraph 2.4.59 of the applicant's scoping opinion states:	Due to health and safety requirements, security fencing is required, however this has been

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			"*The fields encompassing the solar PV modules and supporting infrastructure would likely be fenced using 'deer fence' with wooden or metal post supports which typically have a maximum height of 2.5 m.*" This is likely to present a significant impact on ecological connectivity in an area rich in wildlife and could also present a significant collision risk to low-flying birds. We therefore consider that in this location no security fencing should be used.	reserved only for areas of the Proposed Development where this fencing type is specifically required. Appropriate buffer zones (e.g. 30m from statutory and locally designated wildlife sites and ancient woodland) will be marked by demarcation fencing and signage during construction and decommissioning (see **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** and **Outline LEMP Appendix 2: Landscape and Ecological Mitigation and Enhancements [EN010158/APP/7.6]**). Demarcation fencing will prevent construction activity in proximity to important habitats or species (e.g. SSSI sites, ancient woodland, ponds, badger setts) within and adjacent to the Order Limits. Where required, specific tree protection measures will be implemented, including fencing and construction exclusion zones (see **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]** and **Outline LEMP [EN010158/APP/7.6]**). Fencing that would enclose the Solar PV development would incorporate clearances above ground, or mammal gates, to permit the passage of wildlife as secured in the **Design Commitments [EN00158/APP/5.9].** Mammal

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				gates and clearance gaps under fences will 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. The 10m wide buffer zone between fences and hedgerows/field margins will also allow animals such as deer to disperse along the buffer through the wider landscape (see **Design Commitments [EN010158/APP/5.9]**). The design of the Proposed Development has incorporated significant buffers from the fence line to field boundaries to help facilitate the movement of wildlife including birds. Risks from solar farms to wildlife from fencing is considered relatively low, and it is considered that there is a low risk overall for bird collisions with fencing given these large buffers.
26	p. 10	Lighting	We note that paragraph 2.4.62 of the applicant's scoping opinion states: "*The Rosefield Substation compound, BESS compound, and Collector Compounds would include manually operated or sensor activated lighting, in accordance with relevant standards, but would not be permanently lit. External lighting will be assessed in a lighting assessment which will detail measures that are proposed to*	As confirmed in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** the lighting design would use directional fittings facing away from woodland and hedgerow boundaries and into the Order Limits. The lighting design would limit impact on sensitive receptors by directing lighting downward and away from the Order Limits and existing vegetation. During operation (including maintenance), no part of the Proposed

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			minimise light spill and impacts to sensitive receptors." We welcome the commitment that the site will not be permanently lit. This is an important issue as introducing lighting into this area could potentially impact upon a number of species. There will need to be a Condition to this end if permission is ultimately granted.	Development would be continuously lit. Manually operated and motion detection lighting would be utilised for operational and security purposes. Passive infrared detectors (PID) would be implemented around Solar PV modules, and lighting sensors implemented around the Rosefield Substation and BESS compound. Use of lighting only when necessary and directing lighting downward, away from woodland and hedgerow boundaries, vegetation and watercourses, would reduce impact to bats and other nocturnal species such as badgers and otter.
27	p. 11	Engagement	We request that the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) be consulted on subsequent applications on the site further to this scoping consultation.	Further to scoping, consultation has been undertaken with BBOWT and other relevant consultees as outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.
Bedfordshire and River Ivel Internal Drainage Board				
1	Appendix 2 pg 86	Water	The proposed development falls within the Board's district or will drain directly into it. No development shall take place within 9 m of a watercourse within the district without the prior consent of the Board. Consent under the Land Drainage Act is separate to planning legislation and not superseded by it. Several of the	Consultation has been undertaken with Bedfordshire and River Ivel Internal Drainage Board, Buckinghamshire County Council and the Freshwater Habitats Trust as described in **ES Volume 2, Chapter 7: Biodiversity** and **Chapter 16: Water [EN010158/APP/6.2]**.

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			watercourses within the proposed development footprint are adopted into the Board's maintenance programme. It is therefore essential that during and after any development because of this proposal that the Board can continue to access and maintain these watercourses. The 9 m easement zone is a requirement of our byelaws, made under S.66 of the Act, for us to use heavy plant to undertake maintenance and to spread arisings from said maintenance. The applicant should also be made aware that the watercourses in the development area are also of interest to Buckinghamshire County Council and Freshwater Habitats Trust as part of their Natural Flood Management plans.	The Applicant has set out in the **Design Commitments [EN010158/APP/5.9]** that there will be 9m easement from any IDB watercourse. The Applicant is currently in discussion with the Bedfordshire and River Ivel Internal Drainage board about Protective Provisions that are intended to protect its assets and those discussions also have relevance to the application of the consent procedure under the Land Drainage Act.
Buckinghamshire Council				
1	Appendix 2 p.87 Scoping Consultation and Notification	EIA Method and Scope	I refer to your letter dated 13 November 2023 providing an opportunity for Buckinghamshire Council ('the Council') as a S43 Local Authority and statutory consultee to provide comments on the Applicant's EIA Scoping Report to inform the Environmental Statement (ES) for the proposed development referred to as Rosefield Solar Farm. The following information reflects the views of the Council regarding the information contained	Noted.

ID	Ref	Description	Consultee's comment	Applicant's response
			within each chapter/sub heading of the submitted Scoping Report dated November 2023. The Council's response includes: • The environmental topics or areas for which the Council considers that there are likely to be potential impacts that will need to be addressed in the Environmental Statement (ES). • The geographical area and timeframe over which the potential likely impacts may occur. • Comment on the methods that the Applicant proposes to use to determine the likely significant environmental effects that will arise as a result of the construction and operational phases and cumulative impacts of the Rosefield Solar Farm. • Comments on the impacts that the Applicant intends to scope out on the basis that it considers them unlikely to give rise to likely significant environmental effects. This response has been prepared in consultation with the following Specialist Officers from the Council: • Biodiversity and Ecology • Environmental Health o Noise o Air pollution	

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			o Land contamination • Heritage • Highways and Transport (i.e. the local Highway Authority) • Landscape and Urban Design • Lead Local Flood Authority • Public Rights of Way The Council has also sought specialist input from consultants in preparing the aspects of its response relating to population, health and cumulative effects. Suitably qualified and experienced experts have input into this scoping response letter.	
2	Appendix 2 p.88 Chapter 2	EIA Method and Scope	This section provides a description of the proposed Rosefield Solar Farm Site ('the Site'). The Council notes that the Site comprises four separate land parcels, with some underground connections proposed between the parcels. The Council does not disagree with this description. The Council's comments on Site selection can be found in the Alternatives section in a subsequent section of this letter.	Noted.
3	Appendix 2 p.88	EIA Method and Scope	The document notes up to 500 Megawatts (MW) grid connection has been secured by the Applicant, however the Scoping Report does not outline the MW generating capacity of the	The anticipated installed capacity of the Proposed Development and generation in the first year of operation, as well as total energy generation throughout the operational lifespan taking into

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	Chapter 2		Photovoltaic (PV) panels or the storage capacity of the Battery Energy Storage System (BESS). The solar PV generating capacity is significant as it will enable an assessment of the Green House Gas (GHG) impacts. Further clarification of the efficiency of the proposed panels as well as the role of the BESS is required in order to quantify the overall emissions benefits, and this should be included in the Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES).	account an annual degradation factor, is covered in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2].** Operational energy generation per year is presented in **ES Volume 4, Appendix 8.1: Climate data sources and assumptions [EN010158/APP/6.4]** Table 2. The role of the BESS is expanded upon in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** Section 3.7.
4	Appendix 2 p.88 Chapter 2	EIA Method and Scope	The description of the Rosefield Solar Farm does not set out the construction workforce size, volume of traffic anticipated during the construction phase of the project, nor does it identify anticipated construction traffic routes or alternative transport options for workers. This is important for an assessment of the impacts on communities, residential and other receptors sensitive to traffic impacts.	This information is provided in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**.
5	Appendix 2 p.88 Chapter 2	EIA Method and Scope	Precedent from Scoping Opinions on other Solar Development Consent Order (DCO) applications published by the Planning Inspectorate (PINS) has been reviewed by the Council in preparing this response. It is noted that in the proposed Longfield Solar Farm PINS Scoping Opinion,	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2**] quantifies both the number and type of jobs that are expected to be generated by the Proposed Development in both the construction and operational phases. Construction employment is considered in the

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			against the heading 'Employment opportunities' (page 36), the Planning Inspectorate (PINS)'; I;llll advises that the number and types of jobs created should be estimated in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. For the same project, PINS comments on the construction traffic associated with the workforce, stating that 'The ES should quantify the number of construction workers and vehicle movements required and explain, with reference to relevant thresholds, whether this is likely to result in significant traffic effects' (p.23). The Council will be seeking construction worker information of this nature to be included in the assessment – it is particularly relevant to both the Population and Health assessment and completion of cumulative effects assessment (CEA).	context of the available workforce in the Construction Labour Market Area (CLMA) which is defined within the chapter, and operational employment is considered in the context of the available workforce in Buckinghamshire.
6	Appendix 2 p.88 Chapter 2	EIA Method and Scope	Paragraph 2.4.24 of the Applicant's Scoping Report notes there are two options being considered for the Balance of Solar System (BoSS) for the inverters, transformers and switchgears. The ES will need to assess all options being considered at this stage (e.g. string or centralised inverters; independent outdoor or contained indoor equipment) and any	The ES has assessed both string or centralised inverters; independent outdoor or contained indoor equipment as set out in **ES Volume 1, Chapter 3: Proposed Development Description** and **Chapter 5: Approach to the EIA [EN010158/APP/6.1].** The reasonable worst case has been assessed for each environmental factor as outlined in Section 6 (Approach to the

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			potential impacts arising from each of these (e.g. noise, landscape and visual impact, etc) until or unless a decision is taken on which option would be used in advance of completing the ES.	Assessment) of **ES Volume 2, Chapters 6 – 16 [EN010158/APP/6.2].**
7	Appendix 2 p.89 Chapter 2	EIA Method and Scope	Paragraph 2.4.24 of the Applicant's Scoping Report notes there are two options being considered for the Balance of Solar System (BoSS) for the inverters, transformers and switchgears. The ES will need to assess all options being considered at this stage (e.g. string or centralised inverters; independent outdoor or contained indoor equipment) and any potential impacts arising from each of these (e.g. noise, landscape and visual impact, etc) until or unless a decision is taken on which option would be used in advance of completing the ES.	The ES has assessed the different options considered for the BoSS for the inverters, transformers and switchgears as set out in **ES Volume 1, Chapter 3: Proposed Development Description** and **Chapter 5: Approach to the EIA [EN010158/APP/6.1].** The reasonable worst case has been assessed for each environmental factor as outlined in Section 6 (Approach to the Assessment) of **ES Volume 2, Chapters 6 – 16 [EN010158/APP/6.2].**
8	Appendix 2 p.89 Chapter 2	EIA Method and Scope	Paragraph 2.4.39 of the Scoping Report notes that the location of the BESS is yet to be determined. The ES will need to assess all options being considered at this stage (e.g. string or centralised inverters; independent outdoor or contained indoor equipment) and any potential impacts arising from each of these (e.g. noise, landscape and visual impact, etc).	The ES has assessed the different options considered for the BESS as set out in **ES Volume 1, Chapter 3: Proposed Development Description** and **Chapter 5: Approach to the EIA [EN010158/APP/6.1].** The reasonable worst case has been assessed for each environmental factor as outlined in Section 6 (Approach to the Assessment) of **ES Volume 2, Chapters 6 – 16 [EN010158/APP/6.2].**

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9	Appendix 2 p.89 Chapter 2	EIA Method and Scope	Paragraph 2.4.62 of the Scoping Report notes the Substation compound, BESS compound and Collector Compounds would include manually operated or sensor activated lighting, in accordance with relevant standards, but would not be permanently lit. External lighting will be assessed in a lighting assessment that will detail measures that are proposed to minimise light spill and impacts to sensitive receptors. Whether scoped in or out of the ES, external lighting should be assessed in a lighting assessment to include consideration of glare, glow, lux levels and consideration of Environmental Zone following standards recommended by the Institution of Lighting Professionals and source intensity levels given the countryside location of the site.	A detailed description of the construction and operational lighting design is located within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. The emergency exits may need to be permanently lit, however, these will be discrete and minimal and in compliance with health and safety standards. A lighting assessment has not been undertaken as no significant effects on lighting are anticipated and an assessment accounting for lighting has been considered in **ES Volume 2, Chapter 7: Biodiversity [EN011058/APP/6.2]** and **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. Mitigation measures to avoid or minimise lighting are detailed in and secured by the **Design Commitments [EN010158/APP/5.9], Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline LEMP [EN010158/APP/7.6]**. These include commitments for lighting to use directional fittings, face away from woodland and hedgerow boundaries and for no permanent (continuous) lighting for security purposes, except where necessary to take account of health and safety

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				requirements at emergency exits. Detailed lighting design will be set and agreed with the relevant local planning authority at detailed design, as detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]** and the **Outline OEMP [EN010158/APP/7.3]**.
10	Appendix 2 p.89 Chapter 2	EIA Method and Scope - Waste and Site Restoration	Paragraph 2.4.69 – 2.4.82 of the Scoping Report does not provide detail of the 18-24 month construction programme. Given the level of disruption this will cause, the Council considers that detailed information of the construction programme is required. Such information should also clarify the arrangements for the decommissioning proposed after the 30- 40 year period. This clarification should include the timeframes and assumptions made regarding waste management and site restoration.	The construction phase is anticipated to occur over a 30-month period. Subject to being granted consent, the earliest the Proposed Development's construction phase is anticipated to commence is mid to late 2029. The final construction programme would depend on the detailed layout design and the potential environmental constraints on the timing of construction activities. The Proposed Development currently has a grid connection date of Q4 2031, although there is the potential that an earlier connection could be achieved subject to Connections Reform. It is currently anticipated that construction works would commence in mid to late 2029 and run to 2031. As such, there is a potential likelihood of overlapping construction works on different parts of the Site. Table 3.20 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** indicates the potential

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				construction durations across the different parts of the Proposed Development, showing a series of overlapping stages. The assessments have considered a realistic worst-case commencement of construction works being from the year 2029. Assumptions made in regards to waste management can be found in the **Outline SWMP [EN010158/APP/7.2]** which is appended to the **Outline CEMP**. Restoration of the Site is set out in the **Outline DEMP [EN010158/APP/7.4]**.
11	Appendix 2 p.89 Chapter 3	Alternative Designs	The Scoping Report sets out the intended approach to considering alternatives in Chapter 3 ('Alternatives Considered'). The Council agrees that a consideration of alternatives should be presented in the ES. Notwithstanding this, the Council expects that a number of alternatives have already been considered in agreeing the parameters for the Rosefield Solar Farm, as described for the purposes of scoping. These alternatives are not set out in the Scoping Report (in Chapter 3), so should be included as high-level alternatives for publication within the PEIR, in addition to the matters that the Applicant identifies for inclusion in the Reasonable Alternatives description that will appear in the ES.	A detailed consideration of alternatives is provided in **ES Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** and within the **Site Selection Report** which forms an appendix to the **Planning Statement [EN010158/APP/5.7]** and summarised within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]**.

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12	Appendix 2 p.90 Chapter 3	Alternative Designs	In the Council's opinion, Reasonable Alternatives should include different layouts, scales, technologies adopted, design parameters as well as different sites. The ES should explain in detail what criteria have been used to identify the chosen option and explain what criteria have been applied, as well as reasons why other alternatives have been dismissed. It is considered that the option of 'Do Nothing' scenario should be included in the ES in sufficient detail given the extent of land that will be occupied by the scheme and the adverse effects it may have on soil and carbon storage and any future options to increase the carbon sequestration from this considerable area of land.	A detailed consideration of alternatives is provided in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** and within the **Site Selection Report** which forms an appendix to the **Planning Statement [EN010158/APP/5.7]**. As per the EIA Regulations 2017, this sets out the reasonable alternatives considered by the Applicant. In addition, different layouts, scales, technologies and design parameters are set out. As detailed in **ES Volume 1, Chapter 5: Approach to EIA [EN010158/APP/6.1]**, the Proposed Development is also compared against a 'future baseline (without Proposed Development)' scenario and each environmental factor is assessed against this scenario (**ES Volume 2, Chapters 6-16 [EN010158/APP/6.2]**).
13	Appendix 2 p.90 Chapter 3	Climate and Biodiveristy	The need for the generation of renewable energy should not be stated in isolation. The Committee on Climate Change (CCC) have stated that a considerable amount of carbon could be stored by improved land use and from land use change, as set out in 'Land use: Reducing emissions and preparing for climate change': 'Land is a critical natural asset. It provides us with the fundamentals of life: clean water, food,	The impact of the Proposed Development on GHG emissions, including the net GHG impact and carbon payback periods, are shown in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**. Details of the biodiversity and landscape enhancements, mitigation, monitoring and reporting are set out in **ES Volume 2, Chapter 7: Biodiversity** and **Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and secured within the **Outline LEMP**

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			timber, and the natural regulation of hazards such as flooding. Key to the effective functioning of these is biodiversity. Land is also an essential resource to mitigate climate change, naturally sequestering and storing carbon. Over the rest of this century and beyond, climate change combined with other social, economic, and environmental pressures will present significant risks to the services provided by the land. Unless land is managed more effectively over this transition, its essential functions will not be maintained for future generations'. The above document is now being utilised to set out environmental targets within Part 1, Chapter 1, Part 8 of the Environment Act which will detail how soil health and improved woodland health should be achieved, monitored, and reported. It would be beneficial to understand how this project may impact on these expected targets and the stated ambitions for a Nature Recovery Network.	**[EN010158/APP/7.6]**. Further detail on soils is also presented in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**. 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, this is detailed within the **Outline LEMP [EN010158/APP/7.6]**. **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]** however, 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.
14	Appendix 2 p.90 Chapter 3	Alternative Designs	It is also expected that a 'Do Nothing' scenario considers the long-term impacts of the project on the National Grid capacity, particularly on the supply of energy within Buckinghamshire. This is to understand whether or not there is capacity in	The Applicant has secured a grid connection agreement with National Grid at East Claydon Substation therefore, it is considered that there will be no impacts on National Grid capacity from the project. In a 'Do Nothing' scenario, the East

ID	Ref	Description	Consultee's comment	Applicant's response
			the area. If not, the Council considers that the ES will need to specify how acute the problem.	Claydon National Grid Substation would still be undergoing an upgrade and expansion due to the infrastructure coming to its end of life. The project will contribute to the UK Government's Net Zero targets and support in the decarbonization of the grid.
15	Appendix 2 p.90 Chapter 3	Alternative Designs	It is appropriate to consider how alternative schemes using the same technology may have different acceptability depending on the scale of development. As the scale of a development increases, the resulting increase in benefits is presumably directly proportional as the amount of clean energy that can be produced increases with the amount of land that can be used for arrays. However, it is not obvious that the relationship with environmental impacts is necessarily proportional in the same way, as the marginal impact of each additional hectare of land may be greater than the last. It could therefore be appropriate to consider the relative impact of multiple smaller sites amounting to the same total output. It is the Council's view that this scenario constitutes a reasonable alternative for the purposes of paragraph 14(2)(d) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.	Regulation 14(2)(d) of the EIA Regulations requires that "a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment" is presented in the ES. In compliance with the EIA Regulations, the alternatives considered by the Applicant has been fully described through **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]**. Further, the **Site Selection Report** appended to the **Planning Statement [EN010158/APP/5.7]** provides an overview of the site selection process undertaken to determine the location and extent of the Site. It also provides a description of the development design evaluation undertaken and the main alternatives considered. The **Site Selection Report** considers

ID	Ref	Description	Consultee's comment	Applicant's response
				alternative sites which could be considered to deliver the same technology. Through the design of the Proposed Development, the Applicant has sought to maximise the export potential of the Proposed Development against its grid connection offer whilst also being designed in such a way that takes account of environmental and spatial considerations.
16	Appendix 2 p.91 Chapter 4	Community/ Stakeholder Consultation	Consultation is reported to have been held from 28th September 2023 – 10th November 2023 (4.2.4). One of the stated aims of this consultation was to 'understand key community and stakeholder concerns, insights and proposed design enhancements'. The Council wishes to be made aware of what was raised through this process, particularly in the context of potential/ perceptual impacts on community members. It is considered that this information is important in the decision regarding the scope and approach to assessment and reporting of human health matters into the assessment (see comments made in relation to Chapters 5 and 6 on this topic). Relevant to this, the Council advocates adherence to the November 2022 Institute of Environmental Management and	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the development of the Project, sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This summary statement is in line with the IEMA guidance referred to by Buckinghamshire Council,, with the statement focused around significant residual adverse effects identified through the EIA process which could have an impact on human health at a population level and, if relevant, a sub-population level (and not an individual level).

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			Assessment (IEMA) guidance documents on the scoping and conduct of health assessment in EIA45 respectively, as the latest best practice approach (see further comments in relation to Chapter 6). Chapter 4 of the IEMA scoping document emphasises the role of engagement with health stakeholders and communities as part of determining the health assessment scope, sensitive community groups and local health priorities (para. 4.2). This element is absent from the Scoping Report and needs to be incorporated moving forwards through the PEIR and later EIA stages.	The **Consultation Report [EN010158/APP/5.1]** sets out the engagement that took place with both local community groups and health stakeholders, including specific engagement with the Environmental Health Officer at the host authority (Buckinghamshire). In-line with the approach to engagement referred to by Buckingham Council, the Applicant notes that the design of the scheme and the approach to assessment of effects relevant to health, and the development of mitigation for any significant effects, has been informed through engagement. This is set out within the **Consultation Report [EN010158/APP/5.1],** the **Design Approach Document [EN010158/APP/5.8]** and the **Health and Wellbeing Summary Statement [EN010158/APP/6.4].**
17	Appendix 2 p.91 Chapter 4	Consultation	Para. 4.2.6 of the Scoping Report provides a list of consultees – It is accepted by the Council that the list of consultees is not a definitive list; however, it is recommended that identified consultees include Community Boards in Buckinghamshire and the Internal Drainage Board as well as relevant community and health stakeholders mentioned in the comments	Consultation has been undertaken with the organisations listed in Paragraph 4.2.6 of the Scoping Report (**ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4]**) in addition to consultees identified by Buckinghamshire Council which includes the Internal Drainage Board. A full list of consultation undertaken is set out in the **Consultation Report [EN010158/APP/5.1]**.

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			provided by the Council on paras. 4.2.4 and 4.5.3 of the Scoping Report.	
18	Appendix 2 p.91 Chapter 4	Baseline studies	The ES should clarify what method has been used to establish baseline conditions for each topic and issue - it is noted that Chapter 6 of the Scoping Report is intended to provide this. However, the Council considers the approach to be inconsistent, and not all topics are associated with a reference to specific guidance or recognised methodologies. This inconsistency needs to be addressed, and the ES will need to clarify whether any information has been obtained from third parties. If the information is obtained from third parties, the ES should specify which third party.	The overarching EIA methodology is provided in **ES Volume 1, Chapters 5: Approach to EIA [EN010158/APP/6.1]** with environmental factor specific methodology detailed within each factor chapter (see **ES Volume 2, Chapters 6-16 [EN010158/APP/6.2]**).
19	Appendix 2 p.91 Chapter 4	Baseline studies	Para. 4.5.3 of the Scoping Report indicates that the baseline information will be established through site visits and surveys, desk-based studies and modelling. According to the latest IEMA guidance, for the assessment of human health it is advised that the baseline should also be informed by consultation with health stakeholders and communities (para. 4.2 and Table 4.1 of the IEMA guidance refer to suitable groups). This should be added to the Applicant's approach.	Each environmental factor chapter sets out the relevant baseline information and includes how that information was established (see **ES Volume 2, Chapters 6-16 [EN010158/APP/6.2]**). This is usually done through site visits, surveys, desk-based studies and modelling. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development, sets out where individual topic assessments have considered health effects and reports their

ID	Ref	Description	Consultee's comment	Applicant's response
				significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This summary statement is in line with IEMA guidance referred to by Buckinghamshire Council, with the statement focused around significant residual adverse effects identified through the EIA process which could have an impact on human health at a population level and, if relevant, a sub-population level (and not an individual level). **The Consultation Report [EN010158/APP/5.1]** sets out the engagement that took place with both local community groups and health stakeholders, including specific engagement with the Environmental Health Officer at the host authority (Buckinghamshire). The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** includes a section setting out the baseline position specifically in terms of health receptors, pathways and determinants, which has been informed by a review of feedback from consultation and engagement and policy and strategy published by stakeholders including Buckinghamshire Council.
20	Appendix 2 p.91	Approach to EIA	Para. 4.7.1 of the Scoping Report sets out the baselines that are to be used within the EIA	The interaction of third-party developments is set out in Table 17.1 of **ES Volume 2, Chapter 17:**

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	Chapter 4		process. There is no reference to how the assessment will take account of third-party developments that may interact with the Proposed Development as part of the predicted changes to the baseline at different points in time. This is considered important and a matter that will need to be addressed, particularly for the conduct of the CEA (see comments relating to Chapter 7). As an example, section 2 of the Scoping Report highlights the proximity of part of the Site to current works related to High Speed 2 (HS2); and there are multiple references to HS2 and East West Rail (EWR) within Chapter 6. The traffic and transport section of Chapter 6 specifically mentions the need for HS2 construction traffic to be understood and then removed from baseline traffic modelling in order to reflect assumptions made by the Applicant regarding the relationship of HS2 construction to the construction of the Rosefield Solar Farm. The Council therefore considers that the Applicant will need to provide clarity around the other projects that are to be considered within the assessment, either as influences or changes to the baseline, or through the CEA, or both. This will need to be set out in the future reporting (PEIR and ES) and should be informed by consultation with the Council as host authority,	**Cumulative Effects [EN010158/APP/6.2]**. Consultation with Buckinghamshire Council has been undertaken and the short-list of developments agreed.

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			as well as third party stakeholders as appropriate.	
21	Appendix 2 p.91 Chapter 4	Approach to EIA	Para. 4.8.1 of the Scoping Report cites a mitigation hierarchy. This is not sourced; and the Council considers it may be a topic specific citation rather than a general mitigation approach. The Applicant should clarify and update this within the PEIR.	The standard approach to any EIA development is to apply the mitigation hierarchy which is to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment as per the EIA Regulations 2017. This is set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** and in accordance with the Institute of Environmental Management and Assessment's (IEMA) 'Environmental Impact Assessment Guide to Shaping Quality Development'.
22	Appendix 2 p.91 Chapter 4	Approach to EIA	Table 4.1 of the Scoping Report includes embedded mitigation measures that will form a core part of the Proposed Development. This includes measures related to public rights of way (PRoW) that are intended to reduce impacts to users – this is a traffic and transport, population and human health matter. It is therefore considered to allude to the need for human health to be scoped into the assessment, not just Population (as is currently the case). The Council is of the opinion that impacts on PRoW as determinants of health should be addressed	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** explores impacts on landscape, visual amenity, traffic, transport and access in relation to PRoWs, highlighting the potential for health and wellbeing effects should changes to access (both for drivers and walkers, cyclists and horse riders (WCH)) prevent access between residential and community facilities, and/or dissuade individuals from walking or cycling (either recreationally or for other purposes).

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			as part of a human health assessment chapter (see comments on Chapter 6).	
23	Appendix 2 p.92 Chapter 5	Environmental Factors Proposed to be Scoped Out	The following matters are proposed by the Applicant to be scoped out: Glint and glare Heat and radiation Electric, magnetic and electromagnetic fields Major accidents and disasters Utilities Human health Material assets and waste Water Notwithstanding reference in the Scoping Report to the applicant taking the 'Rochdale Envelope' approach, it is considered that there are a number of elements to the Rosefield Solar Farm that are not currently fixed. The Scoping Report describes the nature of the equipment required for each scenario but does not offer any significant detail on the full extent of the Rosefield Solar Farm in terms of the number and location of pieces of equipment, which could have an impact on what is scoped in. The Applicant has suggested that a number of environmental effects can either be scoped out or do not require standalone chapters in the ES.	Further detail on the extent of Rosefield Solar Farm is presented in **ES Volume 1, Chapter 3: Description of the Proposed Development [EN010158/APP/6.1]**. Matters have been scoped out in accordance with the Scoping Opinion received by PINS and these topics are set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**.

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			The Council has commented on the Scoping Report based on the information available and at this stage is unable to agree that that matters proposed to be scoped out of the ES can be dealt with in this way where the final position of development is not known, the Council has commented on matters of ambiguity.	
24	Appendix 2 p.93 Chapter 5	Glint and Glare	The Council considers this matter can be covered through a standalone assessment provided that the Zone of Influence (ZOI) of the assessment is appropriately justified, and the assessment demonstrates that there would be no potential for significant effects to occur in line with relevant guidance. In the event that potential remains for significant effects from glint and glare, a full assessment should be undertaken, and this should be used to inform the relevant chapters in the ES, in particular for the Landscape and Visual; and consideration of in-combination amenity impacts on PRoW users (with other topics). The Council has also identified that the approach to Finmere Aerodrome may be affected by glare from solar arrays therefore should be considered as a potential receptor for the purposes of a Glint and Glare analyses.	Refer to **ES Volume 4, Appendix 5.4 Glint and Glare Assessment [EN010158/APP/6.4]**. Specific study areas have been considered for aviation and ground-based receptors. Approaches to Finmere Aerodrome have been included as receptors. The results of the technical assessment show no significant residual effects in line with current guidance.

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25	Appendix 2 p.93 Chapter 5	Heat and Radiation	The Scoping Report proposes to scope out an assessment of impacts from heat and radiation during construction, operation and decommissioning as no significant sources are anticipated. The Council agrees this matter can be scoped out provided that the ES will include details of how this has been taken into consideration in site selection, layout and mitigation design.	**ES Volume 1, Chapter 3: Description of the Proposed Development**, **Chapter 4: Reasonable Alternatives Considered** and **Chapter 5: Approach to the EIA [EN010158/APP/6.1]** supported by the **Planning Statement, Appendix 1: Site Selection Report [EN010158/APP/5.7]** set out elements of heat and radiation from Rosefield Solar Farm and how this has been taken into consideration in the site selection and design.
26	Appendix 2 p.93 Chapter 5	EMF	The Applicant proposes to scope out EMF on the basis that the Rosefield Solar Farm would not require cables and infrastructure exceeding 132kV; a threshold set out by Department for Energy and Climate Change (DECC) Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012 guidance. However, it is noted that a 400kv underground cable is proposed to connect to East Claydon Substation. There is no indication given by the Applicant as to how 'minimal' this would be. For this reason, further information that the ES should address is the risks to human health arising from EMF to the extent that it is relevant to the nature of the development, taking into account relevant technical guidance and where significant effects	**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** and **ES Volume 4, Appendix 5.6: EMF Assessment [EN010158/APP/6.4]** set out any potential impacts the 400kV underground cable may have to human health.

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			are likely to occur. The ES should demonstrate the design measures taken to avoid the potential for EMF effects on receptors from the substation infrastructure.	
27	Appendix 2 p.94 Chapter 5	Major Accidents and Disasters	The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Rosefield Solar Farm. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Rosefield Solar Farm's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Rosefield Solar Farm to a potential accident or disaster and also its potential to cause an accident or disaster. The assessment should specifically assess the significance of potential effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.	Major Accidents and Disasters has been scoped out of the Environmental Statement as agreed with PINS (see response in **Section 1** above). Consideration of the risks associated with major accidents and disasters is included in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. Impacts of major accidents and disasters are considered within the **BESS Plume Assessment [EN010149/APP/7.13]**, **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**, **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, and **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. Any relevant mitigation measures are detailed in and secured by the **Outline CEMP [EN010149/APP/7.2]**, **Outline OEMP [EN010149/APP/7.3]**, **Outline LEMP [EN010158/APP/7.6]**, and **Outline Battery Safety Management Plan [EN010158/APP/7.9]**.

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				The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development, sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** also explores health impacts in relation to 'Major Accidents and Disasters'. **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** assesses the potential effects resulting from risks to cultural heritage and sets out any measures to mitigation any potential impacts.
28	Appendix 2 p.94 Chapter 5	Utilities	The Scoping Report suggests that existing infrastructure will be identified through consultation and a search. This will inform the design and protective provisions to avoid impacts on receptors. The Scoping Report states that the outline Construction Environmental Management Plan (oCEMP) will include any additional mitigation measures to protect against interference with below ground utilities during	**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out the existing utilities located within the Order Limits and how this has informed the design. It is also illustrated within **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3]**. Any additional mitigation required has been secured in the **Outline CEMP [EN010158/APP/7.2]** and **Outline OEMP [EN010158/APP/7.3]**.

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			construction and that protective provisions will be agreed with each utility owner. The Council considers a standalone ES Chapter for utilities is not required. However, the ES should explain the findings of the utility search and consultation and signpost to where any required mitigation measures are secured.	
29	Appendix 2 p.94 Chapter 5	Human Health	The Council does not accept the rationale offered at para. 5.7.3 of the Scoping Report for the scoping out of human health as a standalone topic chapter within the EIA process: 'As any potential human health impacts will be captured by the aforementioned assessments and there are not expected to be any significant human health impacts outside of these assessments, it is proposed that human health is not subject to dedicated assessment and therefore excluded from the scope of the EIA'. The Scoping Report as currently drafted fails to provide clarity on the interaction of the Rosefield Solar Farm with likely impacts on determinants of human health and nor does it indicate which determinants of health will be addressed in the cross-referenced assessments and in what way. The Council does not, therefore, have confidence that due and proportionate	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** is intended to provide clarity on the interaction of the Rosefield Solar Farm with likely impacts on determinants of human health and indicates which determinants of health have been addressed in cross-referenced assessments. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises that there are no residual significant effects on human health receptors, confirming the Applicant's approach to

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			consideration will be given to all relevant interactions via the approach to health proposed by the Applicant. Furthermore, as stated in the comments on Chapters 5 and 6, this approach is not recommended in latest guidance and should not be supported as a rationale for scoping out a health chapter (IEMA guidance on Scoping health in EIA, para. 3.11).	effectively scope out a stand-alone chapter from the ES.
30	Appendix 2 p.95 Chapter 5	Material Assets and Waste	The Scoping Report at paragraph 5.8.6 notes that it is not intended to remove significant quantities of excavated arisings from the Site during construction and that where possible, soil arisings will be balanced through a cut and fill exercise to retain volumes on Site. However, there is no reference to the potential use of borrow pits. If the use of borrow pits are confirmed, this matter would need to be scoped into the ES. The Council agrees that this can be scoped out as a specific chapter of the ES.	Borrow pits are not proposed. It is not intended that significant quantities of excavated arisings from the Site during construction (there are currently no demolition works proposed, for example), operation (including maintenance) or decommissioning will be removed. There may, however, be a need to remove some soils from the Site for treatment or disposal, if found to be contaminated, as it is not practical to treat this on Site. However, this is unlikely to be required (refer to **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**). Soil arisings will be balanced through a cut and fill exercise to retain volumes on Site and there is anticipated to a zero cut and fill balance as outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1].** The detailed cut and fill

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				balance for the Site will be developed during detailed design; however, any soil arisings from the relevelling works will be repurposed on the Site.
31	Appendix 2 p.95 Chapter 5	Material Assets and Waste	The ES Project Description should confirm the cut and fill balance. The Council agrees that waste does not need to be a separate chapter of the ES and that the description of the potential streams of construction waste and estimated volumes can be included in the ES description of development chapter. However, an assessment of the likely significant effects that may arise from waste should also be included within the ES within the transport and access and human health chapters of the ES.	The cut and fill balance is set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **Outline Site Waste Management Plan [EN010158/APP/7.2]**. The detailed cut and fill balance for the Site will be developed during detailed design; however, any soil arisings from the relevelling works will be repurposed on the Site.
32	Appendix 2 p.95 Chapter 5	Material Assets and Waste	In addition, the ES should describe any measures implemented to minimise waste and state whether the waste hierarchy will be utilised. The oCEMP should include as much detail as possible on on-site waste management, recycling opportunities, and off-site disposal. If off-site disposal is required, an assessment of likely significant effects including inter-project cumulative effects (e.g. the Rosefield Solar Farm additive cumulative effects with other known projects such as HS2 and EWR) should be	**ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4]** sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phase. The **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**, sets out how materials and waste will be managed throughout the lifespan of

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			included within the ES. It should also provide details of how waste would be managed once the Site is decommissioned.	the Proposed Development. The production of a Materials Management Plan is secured in the **Outline CEMP [EN010158/APP/7.2]**, and will be undertaken at detailed design. The proposed component replacement rates are outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and these have been incorporated into the assessments contained within the ES. Mitigation measures to ensure that materials are diverted from landfill and undertaken in line with the waste hierarchy are detailed in and secured by the **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**. It is not intended that significant quantities of excavated arisings from the Site during construction (there are currently no demolition works proposed, for example), operation (including maintenance) or decommissioning will be removed. There may, however, be a need to remove some soils from the Site for treatment or disposal, if found to be contaminated, as it is not practical to treat this on Site. However, this is unlikely to be required (refer to **ES Volume 2,**

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				Chapter 11: Land and Groundwater [EN010158/APP/6.2]). During decommissioning, any material assets and waste will be removed and recycled or disposed of in accordance with good practice and all legislative requirements in force at the time. If items can be recycled, this will be the first choice. The impacts of waste during the decommissioning phase will be managed and mitigated through measures detailed in and secured by the **Outline DEMP [EN010158/APP/7.4]** and **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**. A detailed SWMP will be produced in substantial accordance with the Outline SWMP which will be prepared as part of the DEMP prior to the decommissioning of the Proposed Development. The detailed DEMP will be discussed and agreed with the relevant planning authority at the time of decommissioning to ensure any impacts on waste arising at this stage are considered and mitigated. The Applicant does not consider it possible to provide a meaningful quantitative assessment of decommissioning waste at this present time due to the uncertainty of future waste management measures and facilities. It is anticipated that

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				further consideration of the potential waste at decommissioning will be a matter for the relevant consenting authority at the time and will be incorporated into the DEMP. During the operation (including maintenance) and decommissioning phases, the Applicant will 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 relevant mitigation to manage waste at decommissioning detailed in the **Outline Site Waste Management Plan**, which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]** and secured by the **Outline DEMP [EN010158/APP/7.4]**, it is anticipated that the majority of waste would be diverted from landfill and transported and managed in line with best practice and legislation at the time, therefore, there is not anticipated to be a significant adverse effect on landfill capacity.
33	Appendix 2 p.95	Water	Given the site is greater than 1ha and is partially located within the fluvial and pluvial flood zones, a detailed Flood Risk Assessment (FRA) and	Refer to **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2], Outline CEMP [EN010158/APP/7.2], ES Volume 4, Appendix**

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	Chapter 5		Drainage Strategy report will be required that assesses all sources of flood risk, and provides details on the surface water management scheme for the Site. It is envisaged that the FRA and Drainage Strategy report will form a technical appendix to the ES Hydrology and Flood Risk chapter. The Council's Lead Local Flood Authority (LLFA) consider matters in relation to surface water drainage can be detailed within the oCEMP, a site-specific FRA and supporting Surface Water Drainage Strategy.	**16.1: Flood Risk Assessment [EN010158/APP/6.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]**.
34	Appendix 2 p.95 Chapter 5	Water	The Scoping Report notes that no consultation has been undertaken regarding ground water with the EA or the British Geological Survey (BGS) and current baseline data is based on third party maps. The depth of groundwater is unconfirmed as these surveys are yet to be carried out. As this information is currently unknown, the Council is unable to agree that this matter can be scoped out.	Consultation has been undertaken with the EA in regards to ground water during Phase Two Consultation which is set out in the **Consultation Report [EN010158/APP/5.1]**. Initial ground investigations have been carried out and are reported in the **Outline Drainage Strategy [EN010158/APP/7.11]**. **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** has set out the baseline data and where this has been acquired and has assessed the impact of the Proposed Development on ground water receptors.

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35	Appendix 2 p.95 Chapter 5	Water	The Scoping Report does not state how the assessment of potential hydromorphological impacts arising from cables crossing waterbodies or drainage will be undertaken. The ES should set out a description of the methodology used and assess impacts from underground cables on existing field drainage and groundwater flow regimes. The Applicant should seek to agree the approach to this assessment with relevant consultation bodies.	The approach to the assessment of impacts on groundwater has been agreed with Buckinghamshire Council. **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** assesses potential impacts if field drains are damaged and to the existing groundwater regime.
36	Appendix 2 p.96 Chapter 6	Air Quality - Consultation	The Council consider Natural England should be consulted on the impact of air pollution on ecological sites.	Natural England has been consulted on this matter and have confirmed that it is satisfied that the Applicant has considered the impact of air pollution on ecological sites. Further detail can be found in the Table 6.1 in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**.
37	Appendix 2 p.96 Chapter 6	Air Quality - Study Areas	The study areas should be determined by following the criteria in the Institute of Air Quality Management's (IAQM) guidance note 'Assessment of dust from demolition and construction 2023, v2.1' and the Environmental Protection (UK) and IAQM guidance entitled "Land Use Planning & Development Control: Planning for Air Quality" (2017).	All relevant guidance is referred to complied with, including in relation to the determination of study areas in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**.

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38	Appendix 2 p.96 Chapter 6	Air Quality - Data sources	The data sources listed to inform the Air Quality assessment is considered appropriate.	Noted.
39	Appendix 2 p.96 Chapter 6	Air Quality - Receptors/assets/resources	The receptors, assets and resources identified in the scoping report to consider further are agreed.	Noted, the assessment remains consistent with these.
40	Appendix 2 p.96 Chapter 6	Air Quality - Matters to be scoped in	It is agreed that IAQM's guidance note 'Assessment of dust from demolition and construction 2023, v2.1' and the Environmental Protection (UK) and IAQM guidance entitled "Land-Use Planning & Development Control: Planning for Air Quality" 2017 is used to scope in and out any requirement for assessment of the impact of both the construction/demolition and operational phases of the development on human health. The Council consider that an opinion on the impact of pollutants on ecological sites should be requested from Natural England.	Designated sites within 50m of the development site boundary and proposed trackout route will be considered in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** as per the IAQM guidance note 'Assessment of dust from demolition and construction 2024, v2.2'. Where applicable, designated habitats within 200m of the affected road network are included in the assessment as per the National Highways Design Manual for Roads and Bridges LA 105 Air Quality. In relation to the impact of pollutants on ecological sites, Natural England has been consulted on this matter and have confirmed that it is satisfied that the Applicant has considered the impact of air pollution on ecological sites. Further detail can be

ID	Ref	Description	Consultee's comment	Applicant's response
				found in Table 6.1 in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**.
41	Appendix 2 p.96 Chapter 6	Air Quality - Matters to be scoped in	The narrative on health assessment in the Scoping Report includes air quality as a contributing topic that addresses the impacts of the Rosefield Solar Farm and will provide suitable mitigation. The Council does not consider this to be sufficient. For example, the most commonly followed air quality EIA methodology (IAQM) would deem any changes in traffic during a construction period less than 24 months in duration to be temporary and therefore unnecessary to include in the context of the potential to significantly adversely affect human health. The construction duration stated in the Scoping Report is up to two years. Any effects of construction traffic on air quality as a determinant of human health would therefore not be assessed in the EIA process. This absence from assessment would fail to capture the potential differential effects of changes in air quality on more susceptible members of the affected population, nor address issues that could manifest as adverse mental health effects due to anxiety, stress or disturbance from dust raising or concerns about increased localised	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development, sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** assesses air quality impacts in relation to health, with air quality being identified as a key influence in the quality of the environment in which a population lives, with implications for long-term health. Furthermore **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** assess baseline air quality at the Proposed Development, levels of all relevant pollutants are expected to be well below the relevant Air Quality Standards, see paragraphs 6.5.3 to 6.5.11 of Chapter 6.

ID	Ref	Description	Consultee's comment	Applicant's response
			pollution, which are typically experienced over a shorter timeframe than two years. This is an illustration of the Council's broader position, which is that there should be a standalone health assessment in the EIA process to capture all relevant determinants of human health, reported together in a health chapter. If this is not supported by the Applicant, then it will be necessary for the air quality assessment to be expanded such that it explicitly addresses these potential health effects – both physical and mental, as well as accounting for the presence of sensitive members of the affected population.	
42	Appendix 2 p.96 Chapter 6	Air Quality - Matters to be scoped in	The Applicant should explain how this topic will conduct CEA.	The cumulative effects assessment is set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which sets out the methodology used to assess cumulative air quality effects.
43	Appendix 2 p.96 Chapter 6	Air Quality - Factor specific assessment	The definition of and approach to a factor specific assessment is unclear.	**ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** sets out the methodology of the factor specific assessments and the results.
44	Appendix 2 p.97	Biodiversity - Overview	The scoping is based upon incomplete survey information. The understanding of the Site needs to be based upon (in some instances):	Since the Scoping Opinion was issued, the assessment of potential direct and indirect effects on the habitats and species for all phases as

ID	Ref	Description	Consultee's comment	Applicant's response
	Chapter 6		• a wider survey area, • greater variety of surveying, • more surveying, • more up to date surveying, • surveying to cover more species groups, • assessment of a wider range of surveys which have already been undertaken in relation to a range of developments (in existence, permitted and refused) in the area, • consultation with a wider range of consultees. The decision making on what needs to be scoped into the Ecology Impact Assessment (EcIA) is not well justified, and the extent of receptors that have been scoped out is excessive. The Applicant should explain how this topic will conduct CEA. The intra-project cumulative impacts in particular (I.e. two or more different ecological impacts on the same receptor) needs to be given substantial attention due to the extent of development in the area and the ecological sensitivities. The approach to scoping on biodiversity is therefore not agreed and needs to be revisited.	requested by the Inspectorate is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Updated surveys have been undertaken where appropriate/required since the Scoping Report was issued. These are detailed within **Section 7.5** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4].** These reports identify and assess effects upon all relevant habitats and species including full baseline surveys. Regarding bat surveys, the survey effort was agreed with Natural England. In addition to the results of bat surveys undertaken for the Proposed Development, Natural England's (2024) 'The Bernwood Population of Bechstein's Bats' was also used to aid the assessment. The ES includes an assessment of impacts to ecological receptors which has informed the location and type of mitigation that is incorporated into the Proposed Development. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** provides a full assessment of both intra and inter project effects of the Proposed Development on biodiversity. For cumulative effects assessment, developments that are already underway and that are proposed

ID	Ref	Description	Consultee's comment	Applicant's response
				in the local area have been contacted for information relating to ecological assessments that have been undertaken, along with publicly available information and this information has been taken into account in the assessment of cumulative effects presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
45	Appendix 2 p.98 Chapter 6	Biodiversity - Sites of Special Scientific Interest	The Site is centred adjacent to, two nationally important Sites of Special Scientific Interest (SSSI), which are ancient woodlands. It is also adjacent to other areas of woodland, most of which are either ancient woodland, priority habitat or both. Together these sites that make up part of the Bernwood Forest area. The impact on the woodland is important because historically these woodlands were part of a more extensively wooded landscape and were linked to a greater extent by other wooded areas that have been cleared at different times in the past. Many of the ancient woodland sites in the wider area are afforded statutory protection through their designation as SSSIs. However, the citations for the SSSIs do not (yet) include bats as Reasons for Notification. It is understood that Natural England is in the process of updating the	As set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, consultation has been undertaken with Natural England to understand the potential impacts to the SSSI sites and areas of ancient woodland adjacent to the Proposed Development and inform appropriate mitigation measures to protect the ecological network. Consultation has also been undertaken with Natural England to agree the survey study area extent and types of surveys required to inform the assessment for bats and discuss how land affected by the Proposed Development will impact foraging, commuting and roosting bat species. In addition, surveys undertaken by Natural England (Natural England (2024), The Bernwood Population of Bechstein's Bats) have also been used to inform the assessment. This has informed the comprehensive assessment of all stages of the Proposed Development

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			citation to include bats (see 6.2.7 of the Scoping Report). Regardless of this administrative delay, it is known through the work of HS2 that these sites and intervening habitats support nationally important populations of Bechstein's bats as well as breeding colonies of Brandt's, Natterer's, brown long-eared, Daubenton's and whiskered bats. Other species recorded in the area include common, soprano and Nathusius pipistrelle, noctule, Leisler's, serotine, and barbastelle. The proposals are likely to reduce the coherent ecological network associated with the SSSIs, other woodland blocks.	presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**, which has been prepared in collaboration with a leading UK bat specialist and includes all species of bats that could be affected. At the time of writing the ES (July 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 presented in this chapter 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. 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.
46	Appendix 2 p.99	Biodiversity - Bernwood Biodiversity	The site is located within the Bernwood Biodiversity Opportunity Area (BOA), a non-statutory designation where targeted action is	The Applicant is aware that the Proposed Development is located within the Bernwood BOA and BBOWT Bernwood Forest and Ray Valley

ID	Ref	Description	Consultee's comment	Applicant's response
	Chapter 6	Opportunity Area (BOA)	considered to have the greatest benefit for conservation at a biodiversity landscape level in Buckinghamshire. The conservation objectives for the BOA are promoted through local planning policy (see section below). The site also falls within the Berks, Bucks and Oxon Wildlife Trust (BBOWT) Bernwood Forest and Ray Valley Living Landscape Project and is considered to be one of the last remaining traditional floodplain meadows in England. The proposals are likely to reduce the coherent ecological network associated with the semi-natural habitat within Bernwood BOA.	Living Landscape Project. Consultation has been undertaken with BBOWT and relevant consultees relating to these designations to discuss potential impacts and measures to protect the ecological network and contribute to the aims of the BOA through the creation, management and restoration of ponds and hedgerows. The assessment provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes an assessment of direct and indirect effects of the Proposed Development on non-statutory designated sites within/adjacent to the Order Limits including Bernwood BOA, and appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The biodiversity design principles set out within the **Outline LEMP [EN010158/APP/7.6]** are realistic and cognisant of local biodiversity priorities already identified for the area and include measures to protect the ecological network of the area and has considered the consultation feedback from consultees. The detailed LEMP will be produced in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust and Buckinghamshire Council. The Proposed Development has been designed to ensure the retention and protection of all

ID	Ref	Description	Consultee's comment	Applicant's response
				designated sites and ancient woodland, other woodland areas, ancient and veteran trees, ponds, watercourses, ditches and the majority of hedgerows and arable field margins within the Order Limits detailed within and secured by the **Outline LEMP [EN010158/APP/7.6]**. 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 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. 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 will create a coherent ecological network that will link the Site to the wider landscape, reducing fragmentation across the wider landscape and

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				supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland will 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 will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support GCN. In addition, these habitats will also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.
47	Appendix 2 p.99 Chapter 6	Biodiversity - Compliance with 2018 Guidelines for Ecological Impact Assessment in the UK and Ireland:	The importance of the site ecologically is not currently reflected in the scope of the EIA in terms of Biodiversity. Sufficient ecological survey data is required to establish the baseline conditions in the absence of the proposed activities (CIEEM guidelines paragraph 3.1). The Scoping report prematurely scopes out significant impacts on certain ecological receptors when the presence or likely absence of	Since the Scoping Opinion was issued, the assessment of potential direct and indirect effects on the habitats and species for all phases as requested by the Planning Inspectorate is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The assessment presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken by competent expert

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		Terrestrial, Freshwater, Coastal and Marine version 1.2 - updated April 2022 Chartered Institute of Ecology and Environmental Management (CIEEM)	the receptor/ importance of the feature(s) is not yet known. It is important to note that "*Ecological baseline conditions are those which exist in the absence of proposed activities. The impact assessment determines how the conditions will change in relation to this baseline to facilitate a clear understanding of the effects of a project*". To eliminate likely significant effects mitigation is generally outlined, however, the Council is of the view that for biodiversity mitigation should not be considered at the scoping stage. It is important to establish the likely significant effects before mitigation in line with CIEEM guidelines.	ecologists, and the level of survey data is considered sufficient to establish the baseline conditions in line with CIEEM Guidelines and to identify the likely significant effects of all stages of the Proposed Development, both before additional mitigation is taken into account and after. Updated surveys have been undertaken where appropriate/required since the Scoping Opinion, this is detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]**. These reports identify and assess effects upon all relevant habitats and species including full baseline surveys. Regarding bat surveys and black and brown hairstreak butterfly surveys, the survey effort/assessment approach was agreed with Natural England. In addition to the results of bat surveys undertaken for the Proposed Development, the Natural England (2024) The Bernwood Population of Bechstein's Bats was also used to aid the assessment. The ES includes an assessment of impacts to ecological receptors which has informed the location and type of mitigation that is incorporated into the Proposed Development. This includes

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				mitigation to maintain ecological functionality and connectivity to the wider landscape.
48	Appendix 2 p.100 Chapter 6	Biodiversity - Survey study area	The study area includes the four parcel areas (Parcel 1, Parcel 1a, Parcel 2 and Parcel 3), proposed cable routes and appropriate buffer zones. It is agreed that the Zone of Influence will vary per receptor. The survey areas for the following are agreed: - preliminary ecological appraisal (PEA) - hedgerows and invasive species - rare and notable arable (non-crop) plants - aquatic preliminary surveys - great crested newts	Noted.
49	Appendix 2 p.100 Chapter 6	Biodiversity - Survey study area	The survey study area for the river condition assessment is not agreed, watercourses on the edge of the site also need to be surveyed.	A river condition assessment was undertaken in September 2023 of the Claydon Brook and connected tributaries located adjacent to the boundary of Parcel 3, and in April 2025 of two small watercourses recorded on the northern boundary of Parcel 1a and the northeast corner of Parcel 1. Details of the survey results and assessment are included in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment (2025)**.

ID	Ref	Description	Consultee's comment	Applicant's response
50	Appendix 2 p.100 Chapter 6	Biodiversity - Survey study area	The survey study area for bat activity is not agreed. The proposed survey study area does not reflect the ZOI for bats and it is therefore insufficient, given the high diversity and importance of the local bat assemblage and presence of populations of nationally rare and uncommon species. The ZOI will need to take into consideration the factors listed in Chapter 3 of the Bat Mitigation Guidelines including the core sustenance zones of the various bat species in the area. The impact assessment on bats will need to include the considerations and valuation methods set out in Chapter 4 of the Bat Mitigation Guidelines. More information about the movement of bats through the site which will not be gained from bat activity surveys. There will be a need for more detailed tracking through mist netting/harp trapping and radio tagging, and potentially other means. This is important to know whether there could be population impacts. Species specific information is required in order to inform the impact assessment and the likely significance of effects. Given the scale of the development and species present it is expected that radio-tracking work will be required and that	Consultation has been undertaken with Natural England to agree the ZOI, survey study area extent and types of surveys required to inform the assessment for bats, of which Natural England are in agreement with. The assessment has also been undertaken in accordance with the Bat Mitigation Guidelines. Trapping sites to support the radio-tracking studies for HS2 (last undertaken in 2022) are located in all the woodlands that would be relevant to the solar farm proposals, and it was not therefore deemed necessary to repeat that exercise in 2025 given this is an invasive technique. Radio-tracking for HS2 is scheduled to be repeated in 2026 and 2030, and these periods were chosen to avoid undue impacts on the bats that could be trapped. Updated surveys have been undertaken where appropriate/required since the Scoping Report was issued, this is detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures in **ES Volume 3 [EN010158/APP/6.3]** and appendices in **ES Volume 4 [EN010158/APP/6.4]**.These reports identify and assess effects upon all relevant habitats and species including full baseline surveys. In addition to the results of bat surveys

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			this will be undertaken in accordance with latest Bat Conservation Trust survey guidelines.	undertaken for the Proposed Development, Natural England's (2024) 'The Bernwood Population of Bechstein's Bats' was also used to aid the assessment.
51	Appendix 2 p.101 Chapter 6	Biodiversity - Survey study area	The survey study area for roosting bats is not agreed. The impact assessment on roosting bats (both direct and indirect impacts) needs to be informed by sufficient survey work. This is likely to include ground level tree assessment surveys of all trees within and adjacent to the site and follow up surveys as necessary in line with current best practice guidelines	Regarding bat surveys, the survey effort was agreed with Natural England. Updated ground level tree assessment surveys for bats were undertaken in 2024/2025 of all trees located within and on the boundary of the Order Limits (see **ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP /6.4]**).
52	Appendix 2 p.101 Chapter 6	Biodiversity - Survey study area	The assessment methods for the woodland outside of the site is not clear from the description in reference to paragraph 6.2.2 of the Scoping Report. A detailed understanding of the use of the surrounding woodlands for roosting bats will also be crucial in assessing the importance of habitat connectivity (including commuting routes) within and around the site. The list of woodlands does not include all of those which are adjacent to the site, and which will be used by roosting bats, it does not include Finemere Wood nor Home Wood and there are	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant habitats and species including full baseline surveys. All areas of the Site have been surveyed to inform the EIA including appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. This has included a detailed understanding of the use of the surrounding woodlands by bats including Finemere Wood, Home Wood and the other smaller areas of woodland adjacent to the Order

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			other small areas of woodland which are not mentioned.	Limits by using the results of surveys undertaken by Natural England (Natural England (2024) The Bernwood Population of Bechstein's Bats**)** which details the importance of the woodland resource for Bechstein's bat. All woodland habitat will be retained in its entirety and will be protected by a buffer and demarcation fencing, as detailed in and secured by the **Design Commitments [EN010158/APP/5.9]**, therefore all bat roosts located within woodland will be retained and protected. The majority of individual trees located within and on the boundary of the Order Limits that have been identified with bat roost potential will be retained and protected by a buffer and demarcation fencing, as detailed in and secured by the **Design Commitments [EN010158/APP/5.9]**. However, if it is found that any trees with bat roost potential would experience direct impacts (e.g. to facilitate access routes or cable routes), they would be surveyed prior to impact to determine presence/or likely absence of a roost. Any loss of a confirmed bat roost would be mitigated and compensated under a European Protected Species licence from Natural England.

ID	Ref	Description	Consultee's comment	Applicant's response
53	Appendix 2 p.101 Chapter 6	Biodiversity - Survey study area	The survey study area for breeding and wintering birds is not agreed. It is necessary to understand the impacts on ground nesting birds as these are likely to be particularly significant as a lot of the ground area will be lost due to the area of solar panels and the open areas around the solar panels will have limited capacity to be used by ground nesting birds. At least 2 years' worth of complete survey data is required, given scale of the development and location of site relative to wintering bird habitat/breeding birds, as well as fluctuations in weather conditions/use of the site between years.	The survey area for wintering and breeding birds is located within Parcels 1, 1a, 2 and 3 which is sufficient to assess likely direct and indirect impacts to bird species utilising the area. Surveys were not required for wintering birds and breeding birds along proposed cable routes as the impacts from this element of works will be minor, short-term and temporary, and habitats will be re-instated following completion of works. The assessment of effects on birds is based on a thorough understanding of the breeding and wintering bird assemblages present including from two years of survey data. Refer to **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report 2022 [EN010158/APP/6.4]**, **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report 2024 [EN010158/APP/6.4]**, **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]**.
54	Appendix 2 p.101 Chapter 6	Biodiversity - Survey study area	The survey methodology for considering reptile suitability is not agreed and is inadequate. Reptile surveys need to be undertaken to adequately inform an impact assessment – the assessment of impacts is proposed to be based	Suitable habitat for reptiles within the solar array and cable route is limited to field margins, the vast majority of which will be retained. Reptile surveys were therefore not required as presence is assumed for the purposes of the assessment and proposed working methods during construction

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			on habitat suitability which will not be sufficient to inform a reptile mitigation strategy (if required).	take account of reptiles to ensure legislative compliance.
55	Appendix 2 p.102 Chapter 6	Biodiversity - Survey study area	The survey study area for badgers is not agreed. The survey study area needs to include the woodland blocks that abut the site and 30m beyond the red line in order to establish presence of setts and understand the use of the landscape by badgers – location of setts, connectivity between them, commuting routes, and key foraging grounds.	Badger surveys were undertaken in 2022 (**ES Volume 4, Confidential Appendix 7.6: Badger Survey Report 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Confidential Appendix 7.15: Badger Survey Report 2025 [EN010158/APP/6.4]**), with the survey area comprising the Order Limits and up to 30m from the Order Limits where access allowed. All known, and any newly discovered, badger setts will be retained with an appropriate buffer (minimum 30 m) implemented from all aspects of the Proposed Development where possible. Fencing is proposed to be permeable to foraging badgers during the operational phase and therefore no significant impacts to foraging badgers is predicted. No setts would be impacted by diverted PRoWs.
56	Appendix 2 p.102 Chapter 6	Biodiversity - Survey study area	Impacts from wildlife on Public Rights of Ways (PRoW), such as badger setts should be considered. These must not be relocated near PRoWs as they cause maintenance issues to the surface, occasionally requiring licences to disturb them to maintain public safety and convenience.	
57	Appendix 2 p.102 Chapter 6	Biodiversity - Statutory and non-statutory designated sites	The Applicant notes that background data searches for statutory and non-statutory designated sites and protected species records will focus on the Site and a 2 km buffer, extended to 10 km for Special Protection Areas	Noted.

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			(SPAs), Special Areas of Conservation. The study areas are agreed.	
58	Appendix 2 p.102 Chapter 6	Biodiversity - Terrestrial invertebrates	No consideration has been given to terrestrial invertebrates. These are important in their own right and in support plants for pollination and of fauna species further up the food chain that rely upon them. The area is known to support a high diversity of invertebrates including rare and uncommon species. The Council considers that invertebrates need to be scoped into the EIA and the assessment of impacts informed by suitable survey work and desk study/literature review of impacts of solar farms on invertebrates. The invertebrate surveys need to include, but should not be limited to, establishing presence/absence and importance of the site to Lepidoptera (butterflies and moths) and glow worm. Butterflies and Glowworms are known to exist in the area.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** fully considers terrestrial invertebrates, noting the records of protected and notable terrestrial invertebrate species. 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]** and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**. In addition, survey works undertaken by Natural England (Natural England (2023). Bernwood Area Invertebrate Surveys 2017-2021 NERR129, Natural England (2023). Bernwood Invertebrate Surveys 2021. Saproxylic and Hymenoptera focused surveys in Ham Home-cum-Hamgreen Woods SSSI and Grendon and Doddershall Woods SSSI, Buckinghamshire and Natural England (2024). A Survey of the Black Hairstreak Butterfly in North Buckinghamshire. The results of surveys of the distribution of Black Hairstreak, *Satyrium pruni* in a complex of woodlands in the Bernwood Area), have also

ID	Ref	Description	Consultee's comment	Applicant's response
				been used to inform the assessment undertaken for terrestrial invertebrates.
59	Appendix 2 p.102 Chapter 6	Biodiversity - Data sources to inform the EIA baseline characterisation	There are many other sources of information which need to be reviewed to establish the baseline. These include: • Consented and proposed schemes on the Greatmoor Estate – requires liaison with FCC Environment and should include: o Greatmoor energy from waste facility (consented and built scheme), o Calvert access track (live application, undecided), o Reverse osmosis plant (consented), o Landfill site solar array (live application, undecided) • Grendon Underwood Prison • HS2 data • East West Rail data This information (and potentially more) will need to be understood in order to inform the cumulative impact assessment.	Consultation has been undertaken with HS2 to obtain ecology survey data for bats. Buckinghamshire Council have agreed with the developments identified on the Short List considered for assessment within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**, For the cumulative effects assessment, developments that are already underway and that are proposed in the local area have been contacted for information relating to ecological assessments that have been undertaken along with publicly available information regarding ecological surveys. This information has been taken into account in the assessment of cumulative effects presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
60	Appendix 2 p.103 Chapter 6	Biodiversity - Surveys to inform the EIA	Surveys have only been taken of a reduced area and therefore this is incomplete. Surveys of all areas where development will be proposed is necessary to inform the EIA. Where there are	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects

ID	Ref	Description	Consultee's comment	Applicant's response
		baseline characterisation	different potential locations for cable routing, they should all be surveyed.	upon all relevant habitats and species for all potential locations for cable routes..
61	Appendix 2 p.103 Chapter 6	Biodiversity - Mitigation	It is too early to be setting this out, as the baseline information is not known, it is premature to consider mitigation at this stage.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** details the embedded mitigation that is incorporated into the Proposed Development. This includes mitigation to protect habitats and species and maintain ecological functionality and connectivity to the wider landscape. It also details additional mitigation requirements to protect habitats and species. Mitigation requirements have been informed by the surveys and assessment undertaken.
62	Appendix 2 p.103 Chapter 6	Biodiversity - Receptors (6.2.9)	This section [Receptors (6.2.9)] only mentions a relatively small number of receptors to be scoped in. This seems to be preselecting what might be significant, based upon incomplete information (ecological baseline is unknown for certain receptors and incomplete for others) and on assumptions about mitigation measures which should not be considered until the ES. Where it is known that mitigation measures will be required, this is a clear pointer to the need to scope them in. The scoping out relies heavily on mitigation measures, which are not relevant at this stage as	The assessment of potential direct and indirect effects on the habitats and species for all phases as requested by the Inspectorate is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].**Full justification for scoping out receptors is included in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			set out above. It is suggested that everything that has been scoped out should be scoped in with the exception of dormice and certain habitats (e.g. modified grassland, cereal crops, arable). All Local Wildlife Sites, woodland sites, arable field margins, scrub, other neutral grassland, hedgerows, trees, watercourses, should be scoped in.	
63	Appendix 2 p.104 Chapter 6	Biodiversity - Receptors (6.2.9)	Following CIEEM guidance is appropriate but note that the guidelines were updated in 2022. Reference to 2018 guidance is outdated. Otherwise, the content in appendix D is broadly appropriate with regards to biodiversity. It must be highlighted that the 'Precautionary principle' which is spelt out in Appendix D has not been followed in the scoping out of receptors/matters.	The biodiversity assessment in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken in line with the latest version of this guidance. i.e. the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024).
64	Appendix 2 p.104 Chapter 6	Biodiversity - 6.2.11 Assessment Methodology	It is also recommended that the following are consulted: North Bucks Bat Group, Bucks Owl and Raptor Group, Bucks Bird Group, Butterfly Conservation, Bucks Badger Group, Buckinghamshire and Milton Keynes Environmental Record Centre, Environment Agency, NatureSpace (re. Great Crested Newts), East West Rail, HS2 ecologists (Kat Stanhope,	The Applicant confirms they have consulted with the following additional consultees suggested by BC: Buckinghamshire and Milton Keynes Environmental Record Centre, Environment Agency, NatureSpace (re. Great Crested Newts), HS2 and local butterfly experts.

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			David Prys-Jones), FCC (data from Middlemarch, SLR).	
65	Appendix 2 p.104 Chapter 6	Biodiversity - List of consultees	Further baseline information will be available through the above-mentioned consultees that will be able to inform the baseline and may help scope in/out certain receptors.	As described in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** consultation has been undertaken with these organisations and relevant records gathered to inform the assessment.
66	Appendix 2 p.104 Chapter 6	Biodiversity - Data sources listed to inform the EIA baseline characterisation	Appendix D of the Scoping Report references a superseded version of 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (Chartered Institute of Ecology and Environmental Management (CIEEM)', it references the 2018 version, it should reference the 2022 version (version 1.2 updated in April 2022).	The biodiversity assessment in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken in line with the latest version of this guidance. i.e. the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024).
67	Appendix 2 p.104 Chapter 6	Biodiversity - Factor specific assessment approach	In sections 6.2.8 and 6.2.9 of the Scoping Report decisions have been made to scope in and out receptors and therefore potential impacts without the full scientific evidence, survey or robustly justified conclusions. The lack of adherence with the precautionary principles in the scoping of potential significant effects is a significant concern.	The assessment of potential direct and indirect effects on the habitats and species for all phases as requested by the Planning Inspectorate is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.Full justification for scoping out receptors is included in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.

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68	Appendix 2 p.104 Chapter 6	Climate - Risks from climate change including impacts from increase in ambient temperature and extreme weather events	Such risks from climate change are proposed to be scoped out on the basis that impacts are not likely to be considered significant during the Proposed Development's lifetime of 40 years. Mitigation will be embedded in the design and technology of the solar array to account for extreme weather events such as storms, high winds, and increased ambient temperatures. On the premise that the ES explains how and to what degree the design and technology accounts for these events, it is agreed this can be scoped out.	**ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4]** considers climate resilience in relation to all elements of the Proposed Development. The embedded mitigation measures relevant to climate change resilience and the benefits they provide are outlined in Section 2.2. Additional mitigation measures are outlined in Section 2.5 and assigned against the specific receptor and effect they are applicable for in tables 9, 10, and 11.
69	Appendix 2 p.105 Chapter 6	Climate - Impacts from Greenhouse Gas (GHG) emissions from land use change	The option of 'Do Nothing' scenario should be included in the ES in sufficient detail given the extent of land that will be occupied by the scheme and the adverse effects it may have on soil and carbon storage and any future options to increase the carbon sequestration from this considerable area of land.	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** presents a 'Do Nothing' scenario as the future baseline. The beneficial impact of carbon sequestration has not been accounted for within this assessment, due to the inherent difficulty of accurately quantifying such measures. This results in a more conservative, worst-case scenario.
70	Appendix 2 p.105 Chapter 6	Climate - Impacts from Greenhouse Gas (GHG) emissions from	The ES should include information regarding Greenhouse Gas Impact of Rosefield Solar Farm from land use change.	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*

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		land use change		*exclusions total a maximum of 5% of total emissions; all exclusions should be clearly stated".* The expected emissions of the change in land use following decommissioning are expected to be less than 1% of total emissions and therefore are not considered further. As well, the beneficial impact of carbon sequestration has not been accounted for within this assessment, due to the inherent difficulty of accurately quantifying such measures. This results in a more conservative, worst-case scenario.
71	Appendix 2 p.105 Chapter 6	Climate - GHG emissions during decommissioning	An Outline Decommissioning Plan should be submitted with the application. The ES should clearly set out if and how impacts from GHG emissions will be assessed for the decommissioning phase.	An **Outline DEMP [EN010158/APP/7.4]** is submitted with the DCO Application. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** sets out how impacts from GHG emissions will be assessed for the decommissioning phases in Sections 8.8 and 8.10.
72	Appendix 2 p.105 Chapter 6	Cultural heritage	The Site sits within a well preserved medieval and post-medieval landscape, with visible upstanding archaeological earthworks (including moats, deserted villages and agricultural	This comment is noted. **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has included a consideration of direct effects on below ground and earthwork remains within the Order Limits and effects resulting from changes to the

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		- Archaeology	earthworks) surviving in good states of preservation across the landscape. It is important to note that some of these assets are designated as Scheduled Monuments, whilst others are recognised on the Local Heritage List as Non-designated Heritage Assets. Recent archaeological works have also identified evidence of multi period earlier remains across the wider area, such as the discovery of a Roman settlement near Twyford during HS2 excavations which included the discovery of a rare early Roman wooden figurine. It is considered likely that the application site contains hitherto unknown archaeological assets which may be impacted upon by the Rosefield Solar Farm.	setting of designated earthworks within the 5km study area. The potential for previously unrecorded archaeological remains has been evaluated through the use of geophysical survey (**ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4]**) and trial trenching (**ES Volume 4, Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]**). The potential for further currently unknown archaeological remains is acknowledged within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** where a precautionary approach to assessing the importance and potential impacts on such remains has been taken. A programme of post-DCO consent further evaluation and mitigation set out within the **Draft Archaeological Management Strategy [EN010158/APP/7.10]** and secured by a DCO Requirement will ensure that appropriate mitigation for impacts to any such currently unknown archaeological remains is agreed with Buckinghamshire Council and where relevant Historic England**.**
73	Appendix 2 p.105	Cultural heritage - Archaeology	It is not agreed. Section 6.4 (specifically 6.4.1 and 6.4.4) of the Scoping Report suggests that the EIA will be informed by a historic environment desk-based assessment and the	Targeted trial trenching of areas of hard infrastructure has been carried out in accordance with a Written Scheme of Investigation agreed with Buckinghamshire Council's Archaeological

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	Chapter 6	Baseline characterisation	results of a geophysical survey. It then states that the need for, scope, and timing of intrusive evaluation will be negotiated and agreed following these works. Buckinghamshire Council Archaeology Service (BCAS) always expect the results of geophysical survey to be verified by trial trenching, therefore the need for the works has already been established. In regards timing of such works, it is not clear whether the applicant is suggesting that intrusive evaluation be undertaken pre or post DCO submission, but BCAS would expect the evaluation works to be undertaken at the earliest opportunity to inform the ES and DCO submission.	Advisor (the Buckinghamshire Council Archaeology Service (BCAS)). The results of this evaluation are contained within **ES Volume 4 Appendix 9.4: Archaeological Trial Trenching Report [EN010158/APP/6.4]** and have informed the assessment within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** Further post-consent evaluation is proposed (as set out in the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**).
74	Appendix 2 p.106 Chapter 6	Cultural heritage - Archaeology receptors, assets and resources	There is a need for a thorough assessment of the historic landscape as a whole. Appendix 1 references the ridge and furrow earthworks present within the application site boundary. These earthworks form part of a larger area of earthworks recognised on the Local Heritage List. The impact on the whole area of the open fields of Shipton should be considered, and the asset not divided into field-by-field assessments, which will invariably lower their significance, as	Effects to ridge and furrow earthworks have been considered both as individual groups of open fields (each associated with separate settlements) and as part of the surviving post-medieval field system and have been assessed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**.

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			the significance of these earthworks come in part from their landscape value, and group value.	
75	Appendix 2 p.106 Chapter 6	Cultural heritage - Archaeology - Mitigation	Mitigation proposed in the scoping report is not agreed. Information regarding the location of any remains, the depth of the archaeological horizon, and comparison with the final layout plan to be sure that the remains could be safely preserved without impact. Only once this is ascertained, a three phased management plan would be recommended. The following information is required within the ES: a) how the solar panels/BESS are proposed to be installed without damage to the underlying archaeology. This should include reference to vehicle movement, site conditions, and installation. In addition to a description of the chosen approach, use of tracked matts, low impact vehicles and/or soil build up should all be considered. The report should be site specific and draw on the results of evaluation reports to inform topsoil depth and location of features. b) Operation - A management plan for the protection of any buried remains throughout the operational life of the solar farm/BESS c) Decommissioning - A methodology in regards	Mitigation measures for the BESS and Rosefield Substation have been agreed with BCAS and are set out in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** A phased approach to post-consent evaluation and mitigation is set out in the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**, this will ensure that the agreed mitigation measures and any other appropriate mitigation measures for other heritage assets identified within the geophysical survey or within the post-consent evaluation are secured. The **Draft Archaeological Management Strategy [EN010158/APP/7.10]** sets out that detailed Written Schemes of Investigation (WSIs) for all phases of evaluation and mitigation will need to be submitted to and approved by Buckinghamshire Council in consultation with Historic England. Protection measures where necessary for archaeological mitigation will be secured through the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.

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			to protecting the buried remains during the decommissioning and removing the panels, to accompany any documents submitted to address any relevant Condition relating to decommission. A programme of archaeological excavation may be required which can be decided upon following the results of the evaluation. A full detailed, contractor specific Written Scheme of Investigation will be required in advance of any works.	
76	Appendix 2 p.107 Chapter 6	Cultural heritage - Archaeology - receptors	There are concerns that findspot data is being scoped out/removed. The presence of these findspots is an indication that associated buried remains are present in these locations, and therefore that associated buried remains could be harmed by the development. This is a good example of why the ES needs to be informed by intrusive archaeological investigation.	Findspots have been included within **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** and have informed the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**.
77	Appendix 2 p.107 Chapter 6	Cultural heritage - Archaeology inconsistencies	Paragraph 2.4.15 of the Scoping Report states archaeology trial trenching is currently being undertaken. The Council is not aware of any active evaluation work in this area. This statement contradicts the approach presented throughout the Scoping Report which suggests trenching has yet to take place.	The Applicant confirms that this was an error in the Scoping Report. However, trial trenching has since been carried out in accordance with a Written Scheme of Investigation agreed with BCAS.

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78	Appendix 2 p.107 Chapter 6	Cultural heritage - Heritage assets	Due to the scale of the development and proposed study area there are a wide range of heritage assets that should be considered. The Scoping documents identify some of these, however there are heritage assets that have not been considered which should also be included such as the emerging Local List and Neighbourhood Plans.	Heritage assets on the Buckinghamshire Council Local List and within the Neighbourhood Plans for settlements within the 1km study area have been included in **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** as non-designated heritage assets.
79	Appendix 2 p.107 Chapter 6	Cultural heritage - Heritage - Study Area	This has been considered alongside the Zone of Theoretical Visibility (ZTV) in Volume 2. The distance for Non-Designated Heritage Assets in paragraph 6.4.2 of the Scoping Report is agreed. The 5km study area is not agreed. The ZTV models in pages 607 -613 of Appendix 1 of the Scoping Report show that the proposed development could theoretically be visible from well outside of the study area. It is noted that the scale of the proposed development is vastly disproportionate to the scale of all nearby settlements, local development pattern. The ES should define the study area based on ZTV and from consultation bodies. For example, where the 5km radius touches on highly significance heritage assets such as the Waddesdon and Wotton Underwood Registered Park and Gardens (RPG) (and their related heritage assets) and where designed views (often over	A ZoI has been expanded to 6km to ensure highly significant heritage assets on the edge of the 5km study area are included within the assessment. ES **Volume 3 Figure 9.3 Designated Heritage Assets within 5km of the Order Limits Overlain on the ZTV [EN010158/APP/6.3]** also shows assets beyond the 5km study area. The assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Buckinghamshire Council's Built Heritage Advisor and Historic England. None are beyond the 5 km study area. This is detailed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** and associated appendices. The expanded ZoI has also been reflected in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2].**

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			great distances) contribute to their setting and significance, a more thorough assessment should be made in respect of heritage assets that may fall just outside of the 5km radius but which contribute to the overall significance of these high level RPGs and related Conservation Areas. The Council is actively working on adopting a local list for Buckinghamshire. Live project data is available online and therefore, nominated sites and structures should be used in addition to information on the Historic Environment Records. The ES should ensure that the study area is based on the ZOI and where impacts to the historic environment are assessed in other relevant chapters such as the landscape and visual chapter, any differences in the applied study areas are explained and justified.	**ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** has included information on nominated sites and structures contained within local list for Buckinghamshire available online (as of July 2025).
80	Appendix 2 p.108 Chapter 6	Cultural heritage - Heritage - Study Area	The Council is unable to agree the list of assets scoped out of the ES. For example, assets such as the designated landscapes of the Grade I Waddeson Registered Park and Garden, Grade I Manor and its associated assets derive significance in part from long range views which could be impacted by a development of the scale	Waddesdon Registered Park and Garden and the Grade I listed Waddesdon Manor have been considered within **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]**, and no likely significant effects are predicted. Similarly, Quainton and Grendon Underwood

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			proposed and should not be coped out as their significance is not confined to their immediate street scene or rural setting. Similarly, Quainton Conservation Area appraisal identifies long distance landscape views which contribute to its significance and other CAs such as Grendon Underwood also benefit from extensive landscape views towards the site and gain some significance from a connection to their agricultural landscape setting.	Conservation Areas have been also included in the above assessment and no likely significant effects are predicted. The assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Buckinghamshire Council's Built Heritage Advisor and Historic England.
81	Appendix 2 p.108 Chapter 6	Cultural heritage - Heritage - Study Area	The importance of low-level harm to a wide range of designated heritage assets should also be considered. Additionally, the Council would like to reserve the right to request more detailed assessments and verified views from or to any assets that it feels should be assessed in more detail.	The assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Buckinghamshire Council's Built Heritage Advisor and Historic England and detailed assessment of these is presented within **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** including views from an accurate 3D model and reference to relevant LVIA Visualisations within **ES Volume 4 Appendix 10.6 [EN010158/APP/6.4]**.
82	Appendix 2 p.109	Cultural heritage -	It is not appropriate to scope out impact to setting for the NDHAs falling outside of the application site but within the 1 KM study radius. The table at 6.4.9 of the Scoping Report states	The potential for impacts resulting from changes to the setting of all Non-Designated Heritage Assets (NDHAs) within the 1km study area are considered within **Annex C** of **ES Volume 4,**

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	Chapter 6	Heritage - Study Area	that effects to setting 'are not anticipated to result in a level of harm sufficient to cause significance effects' however, cumulative harm from the development on both Designated and Non-Designated heritage assets can be anticipated and should in fact be scoped into the review.	**Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** Cumulative assessment in EIA (as presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** refers to the assessment of impacts resulting from the Proposed Development and other consented or proposed developments. The assessment of impacts on designated and non-designated heritage assets presented in **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** whilst carried out individually, includes consideration of how group value or relationships between heritage assets contributes to their significance and how the Proposed Development would impact on this contribution.
83	Appendix 2 p.109 Chapter 6	Cultural heritage - Heritage - Study Area	The study area should scope in assets to include and identify all assets where there is any intervisibility between heritage assets and the proposed development, or where significance is otherwise impacted by changes in the surrounding landscape. This is applicable even where no intervisibility exists and/or where negative changes include the severing of	The setting assessment (**Annex C** and **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** has been carried out in accordance with the guidance contained within Historic Environment Good Practice Advice in Planning: 3). This has included

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			relationships between assets and settlements may occur (in line with Historic Environment Good Practice Advice in Planning: 3).	consideration of the impact of severing historical relationships between assets.
84	Appendix 2 p.109	Land soils and groundwater - Minerals	There are a number of mineral safeguarding areas across the land parcels. These all relate to alluvial deposits, which are present along the routes of watercourses. A Minerals Assessment should be undertaken to inform and influence the design and layout of the development and demonstrate how impacts to Mineral Safeguarding Areas have been minimised. The ES should demonstrate that the Council as the Minerals Planning Authority has been consulted in respect of all of the proposals and that the proposed development does not impact on future ambitions for minerals extraction within the area.	**Appendix 2: Mineral Safeguarding Assessment** of the **Planning Statement [EN010158/APP/5.7]** has been prepared for the Proposed Development. Consultation with Buckinghamshire Council has been undertaken in regards to Mineral Safeguarding, see Table 11.1 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**. Buckinghamshire Council has confirmed that they agreed to the approach of scoping this issue out of the ES, as long as it was fully assessed by a Mineral Safeguarding Assessment (**Appendix 2: Mineral Safeguarding Assessment** of the **Planning Statement [EN010158/APP/5.7])**.
85	Appendix 2 p.109 Chapter 6	Land soils and groundwater - Land contamination	The Council welcomes the inclusion of a Preliminary Risk Assessment report will be prepared to provide a desk-based analysis of the site and ground investigation works are scheduled to take place on the site to obtain data relating to soil conditions, contamination status and groundwater.	**ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** has informed **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**.

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86	Appendix 2 p.110 Chapter 6	Land soils and groundwater - Land contamination	Potential contamination in Parcel 3 of the proposed development will be scoped into further assessment due to a known historical railway that crossed the site from north to south. Section 6.5.8 of the Scoping Report states that further assessment of this feature will be completed as part of the Preliminary Risk Assessment report for the site. This is agreed.	Assessment of land contamination within Parcel 3 (including the presence of the historical railway line) is provided in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**, with further information in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]**..
87	Appendix 2 p.110 Chapter 6	Land soils and groundwater - Land contamination	Potential contamination in all areas except part of Parcel 3 will be scoped out of further assessment. This is because a review of the historical usage of the site has identified the land parcels have been in use as agricultural fields since the earliest historical mapping. Further assessment of these areas may not be required however the evidence behind this decision must be clearly outlined within the Preliminary Risk Assessment report which is to be submitted in support of the ES. Until this matter is clarified, the Council cannot agree to it being scoped out. Potential contamination during the operation and decommissioning phases of the proposed development have also been scoped out.	Consultation has been undertaken with Buckinghamshire County Council as set out in Table 11.1 in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2].** The Chapter scopes in contaminated land and includes an assessment for the entire area of the Order Limits.
88	Appendix 2 p.110	Land soils and groundwater -	Potential risks of soil and water contamination from leaks, improper storage, or spills during the construction phase, should be mitigated through	**ES Volume 2, Chapter 11: Land and Groundwater** and **Chapter 12: Soil [EN010158/APP/6.2]** set out any mitigation

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	Chapter 6	Land contamination	implementation of standard best practice measures secured via the oCEMP.	measures to prevent or reduce the risk of soil and water contamination. The mitigation and prevention measures are secured within the **Outline CEMP [EN010158/APP/7.2]** and **Outline OEMP [EN010158/APP/7.3]**.
89	Appendix 2 p.110 Chapter 6	Land soils and groundwater - Ground water	The Council's records show that the site lies within a Source Protection Zone. The ES should assess impacts from all phases of the development to groundwater where significant effects are likely to occur. Best practice measures should be employed and secured via the DCO to ensure any potential pollution impacts are minimised.	There are no groundwater Source Protection Zones (SPZs) defined and managed by the Environment Agency within the Order Limits. The assessment considers groundwater resources during all phases of the Proposed Development, as presented in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**. Best practice mitigation measures are secured through the **Outline CEMP [EN010158/APP/7.2]** and **Outline OEMP [EN010158/APP/7.3]**.
90	Appendix 2 p.110 Chapter 6	Land soils and groundwater - Soils	There is no reference in the Scoping Report as to whether or how agricultural land use would still carry on across the Site alongside the operation of the Rosefield Solar Farm. Changes to the hydrogeological regime as a result of the Proposed Development may also affect the quality of soils within the Site and this should be assessed within the ES.	**ES Volume 2, Chapter 11: Land and Groundwater** and **Chapter 12: Soil [EN010158/APP/6.2]** assess any potential impacts to agricultural land and soil quality by the Proposed Development including consideration of changes to the hydrogeological regime. The areas of Interconnecting Cable Corridors will be reverted back to agricultural after construction of Rosefield Solar Farm. Areas which are designated for electrical infrastructure and biodiversity mitigation and enhancement will not be reverted back to

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				agricultural use during operation (including maintenance) however, the Applicant is currently in discussions with the land owner and tenants as to whether grazing is possible.
91	Appendix 2 p.111 Chapter 6	Land soils and groundwater - Soil Management Strategy	The Scoping Report states that a separate outline Soil Management Strategy (SMS) will be produced, detailing measures to reduce or avoid damage to soils. For clarity, this should be provided with the application and detail how this is secured through the DCO.	An **Outline Soil Management Plan [EN010158/APP/7.7]** is provided which has been agreed with Natural England and secured within the **draft DCO [EN010158/APP/3.1]**.
92	Appendix 2 p.111 Chapter 6	Land soils and groundwater - ALC	The Scoping Report suggests an Agricultural Land Classification (ALC) was carried out which identified 96% of land classified as 3b (moderate), 2% is 3a and 1% is Grade 2 (very good). An ALC survey for the potential cable route connection has not been undertaken. The ES should provide a regional assessment of the loss of BMV land and assess any significant effects where they are likely to occur. As given the size of the site, the 3% or more represents a significant proportion of land. The ES should include details of the operational impacts of the proposed development in terms of the loss of agricultural and BMV land because of the removal of this land from productive use. The assessment should also include and detail	The results of the ALC surveys indicate that 10.2ha of the Site (1.51%) is classified as BMV land (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** and **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]**). The ES assesses the impact of the Proposed Development on BMV land and loss of agricultural land (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**) and sets out mitigation measures which are secured in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline Soil Management Plan [EN010158/APP/7.7]**. There is still a section of the Interconnecting Cable Corridor that requires an ALC survey to

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			mitigation measures to remove, reduce or minimise such impacts.	understand the soil quality. Based on all available sources of data, the ES assessment has assumed that the land is of 3b quality in agreement with Natural England (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**), with surveys aiming to be undertaken post-submission of the DCO Application.
93	Appendix 2 p.111 Chapter 6	Landscape and Visual - Study area	The study area is not agreed. The ZTVs have been used to help define the proposed 5km Study Area. An assumed height of 15m is given to woodland as a filter to these initial ZTVs. This is very high woodland height for this area. For the purposes of representing a 'worst case scenario', a bare earth ZTV would be a more realistic starting point. Filters such as woodlands, hedgerows and tree lines can be introduced to the ZTVs once the bare earth ZTV is established. The heights of these should then be agreed with the Council.	ZTVs can be found in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]**. It was agreed with Buckinghamshire Council to extend the study area to 6km and review all sensitive potential landscape and visual receptors. Justification for the agreed study area is set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**, together with a confirmation that there would be no significant landscape and visual effects beyond the study area adopted. Final ZTVs have been prepared for bare earth and screening ZTVs with the latter using agreed screening heights of 6m for buildings and 10m for woodland.
94	Appendix 2 p.111 Chapter 6	Landscape and Visual - Study area	It is recommended that the Study Area be expanded to 6km, to include the sensitive potential receptors such as Waddesdon Manor, Waddesdon Hill, Brill and Oving Hills.	The Study Area was extended to 6km to include the noted sensitive receptors. ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** and although they indicate some 'theoretical visibility' of the Proposed

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				Development from Waddesdon Manor, Waddesdon Hill and Brill RPGs site work has established that the Proposed Development would not be discernible from these locations. During consultation with Buckinghamshire Council, it was agreed that the effects would not be significant, and these receptors could be scoped out of the ES. Oving Hills are located within the Quainton-Wing Hills AAL which is included as a receptor in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**.
95	Appendix 2 p.111 Chapter 6	Landscape and Visual - Study area	Para. 2.2.7 of the Scoping Report explains that the locations for the various development features such as Collector Compounds, solar panels and Project Substations are based on the parameter plan at Appendix B, Fig1 of the Scoping Report. Given this proposal takes a Rochdale Envelope approach, it is unclear whether the location of the intrusive elements of the proposal are fixed. If it is possible for the locations to be changed through the design process, then it is reasonable to expect the ZTVs to also assume this worst-case scenario when defining the Study Area. The ZTVs and resulting Study Area would have to be based on any of	ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** and use a worst-case scenario based on the maximum height parameters and extents for the Proposed Development.

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			the features being in any location within the red line boundary.	
96	Appendix 2 p.112 Chapter 6	Landscape and Visual - Study area	The ES should justify the extent of the study area/s with reference to recognised professional guidance and the extent of the likely impacts, informed by fieldwork and relevant models or approaches such as the ZTV. The Applicant should agree the study areas with relevant consultation bodies.	ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** which extend to a study area of 6km as agreed with Buckinghamshire Council. In accordance with the Guidelines for Landscape and Visual Impact Assessment (Third Edition), this is considered sufficient to review all sensitive potential landscape and visual receptors with no significant landscape and visual effects beyond the study area adopted.
97	Appendix 2 p.112 Chapter 6	Landscape and Visual - Landscape Characterisation	This is not agreed. The ES should consider all appropriate landscape related studies (e.g. National Character Areas, Local Character Areas, Neighbourhood Plans etc), that fall within the Study Area. All relevant landscape related documents that form the background evidence to the Vale of Aylesbury Local Plan should be considered.	The **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** includes all relevant landscape studies at national and district scale to within the study area. The assessment therefore includes relevant National Character Area studies published by Natural England and more local Landscape Character Type/Landscape Character Area studies included in the Aylesbury Vale Landscape Character Assessment. Neighbourhood Plans have also been referenced where relevant in the **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2].** It is noted that the Vale of Aylesbury Local Landscape Designations document, which defines

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				Areas of Attractive Landscape (AAL), had been removed from Buckinghamshire Council's website when reviewed in June 2025. Buckinghamshire Council confirmed this was still a 'live' document and provided a PDF copy. The Quainton Wing Hills AAL has been reviewed as part of this assessment.
98	Appendix 2 p.112 Chapter 6	Landscape and Visual - Viewpoints	Viewpoints should include but not be limited to Quainton Hills and Finmere Hills given its location within the Quainton-Wing Hills Area of Attractive Landscape. A full list of viewpoints should be agreed with the Council.	Viewpoints can be found in **ES Volume 3 [EN010158/APP/6.3]** and visualisations relating to the viewpoints can be found in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**. A meeting was held on Site with Buckinghamshire Council Landscape Architect in 11 February 2025 to discuss, amongst other matters, viewpoints. A full list of viewpoints has been agreed with Buckinghamshire Council via email on 30 April 2025 including viewpoints from Quainton Hill and Finemere Hill.
99	Appendix 2 p.112 Chapter 6	Landscape and Visual - Receptors/assets/resources	Residential receptors – these should be included in the LVIA (not just in the proposed separate Residential Amenity report) and not restricted to those within a 200m envelope, as suggested in para. 6.6.4 of Vol.1 of the Scoping Report but be considered in the first instance from the whole Study Area.	There would be a variety of views of the Proposed Development from properties scattered throughout the study area, most usually grouped with other nearby receptors, and these are addressed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. With regard to specific properties, the study has taken a precautionary approach based on best

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				practice guidance as set out in Landscape Institute Technical Guidance Note 2/19. This takes into account buffers from the various built structures (200m from Solar PV, 400m from structures up to 6m height and 800m from structures up to 15m height) to determine which properties should be included in the RVAA as presented in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]**.
100	Appendix 2 p.112 Chapter 6	Landscape and Visual - Receptors/assets/resources	Winter photographs – although winter surveys are referred to, it is not clear if photography is also being carried out. It is imperative that winter photos are shown alongside summer ones in all visuals to demonstrate the worst-case scenario. Winter photos will also be required as a basis for the photomontages.	Visualisations relating to the viewpoints can be found in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**. Winter photography has been used as the basis for all visualisations and photomontages to demonstrate a worst-case scenario and agreed with Buckinghamshire Council (see Table 10.1 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010518/APP/6.2]**).
101	Appendix 2 p.112 Chapter 6	Landscape and Visual - Receptors/assets/resources Biodiversity	It is inappropriate to consider mitigation at this stage. Details of hedgerows should be provided to establish a baseline.	Hedgerow surveys were undertaken as part of **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]** with results of the surveys provided within these reports. This assessed their value using the

ID	Ref	Description	Consultee's comment	Applicant's response
				ecological criteria for 'Important Hedgerows'. Details of mitigation are provided in the **Outline LEMP [EN010158/APP/7.6]** and the **Design Commitments [EN010158/APP/5.9]**.
102	Appendix 2 p.112 Chapter 6	Landscape and Visual - Receptors	The Council considers that any Registered Park and Garden, village/hamlet within the Study Area (expanded to 6km as described above) should be scoped in.	All Registered Parks and Gardens within the 6km study area have been considered as potential receptors, however all but Claydon House have been scoped out of the final detailed study. Updated ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** and although they indicate some 'theoretical visibility' of the Proposed Development from Waddesdon Manor and Wotton Underwood Registered Park and Garden over 4.5km to the south, site work has established that the Proposed Development would not be discernible from these receptors. Similarly, villages and hamlets have been excluded where there would be no discernible visual effects, albeit they may demonstrate a degree of theoretical visibility. During consultation with Buckinghamshire Council, it was agreed that where these effects would not be significant the receptors could be scoped out of the ES.
103	Appendix 2 p.113	Landscape and Visual - Receptors	As the volume of passengers using East West Rail and HS2 are likely to be significant, there is potential for a significant effect, even though the	Users of East West Rail have been scoped into the assessment based on potential visibility of Parcel 1. Following the removal of Solar PV

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	Chapter 6		effect may be short lived. The Council considers that this matter should be scoped in.	modules from Parcel 1a, the potential for even short-lived views from users of HS2 have been substantially reduced. Updated ZTVs are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** and although they indicate some 'theoretical visibility' of the Proposed Development, site work has established that the Proposed Development would not be discernible, and HS2 users would not experience likely significant effects. During discussions with Buckinghamshire Council, it was agreed via email dated 28 April 2025 that effects would not be significant and HS2 could be scoped out of the assessment.
104	Appendix 2 p.113 Chapter 6	Noise and Vibration - Study area	The study area for noise during construction is proposed to include receptors located within 300m of the Proposed Development. No consultation has taken place with the Council's EH officer to establish the baseline. The ES should explain how the study area and sensitive receptors have been selected with supporting evidence including noise modelling/noise contouring mapping.	Refer to **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** for an overview of the baseline noise monitoring locations which also provides a summary of the consultation with Buckinghamshire Council who accepted the survey approach (including the monitoring locations) Baseline noise monitoring locations were chosen to represent the nearest noise sensitive receptors to the Proposed Development. These are shown in **ES Volume 3, Figure 13.2: Baseline Survey Locations [EN010158/APP/6.2]** and noise

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				contour mapping is presented in **ES Volume 3, Figures 13.3 and13.4: Operational Phase Noise Contours [EN010158/APP/6.2]**.
105	Appendix 2 p.113 Chapter 6	Noise and Vibration - Study area	The ES should provide a plan showing the location of all sensitive receptors identified for assessment overlayed with noise contour mapping. This should cross reference the EWR/HS2 projects being carried out in the area to understand the cumulative impacts to aid understanding of the potential for significant effects relating to noise.	**ES Volume 3, Figure 13.3** and **13.4 [EN010158/APP/6.3]** show the operational phase noise contours and noise sensitive receptors identified for assessment within the defined study area. The cumulative noise impacts are provided in **ES Volume 2, Chapter 17: Cumulative effects [EN010158/APP/6.2]**.
106	Appendix 2 p.113 Chapter 6	Noise and Vibration - Receptors	Scoped out of further assessment is the effect of vibration during the operational phase of the development. The report's justification is because the vibration will be low and unlikely to be perceptible over the distances to the nearest residential dwellings. However, walkers, cyclists, and horse riders are more likely be much closer to the sources of vibration than residential dwellings as many routes go directly through the parcels identified for solar panels and battery storage. The Council considers that this matter should be scoped in to ensure vibrations do not affect the	This matter is scoped out of the assessment, as detailed within **ES Volume 4, Appendix 5: EIA Scoping Report [EN010158/APP/6.4]** and confirmed within **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]**. However, **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** requested that the ES should demonstrate that operational plant and equipment is of a type that does not generate a perceptible level of vibration or is to be used in locations unlikely to result in significant vibration impacts on both human and ecological receptors. The Applicant can confirm that operational elements, including fixed plant

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			amenity of the PRoWs, particularly the possibility of impacting the safety of horse riders.	items/structures, would not emit discernible levels of vibration and are located at a sufficient distance away from sensitive receptors.
107	Appendix 2 p.113 Chapter 6	Noise and Vibration - Receptors	The narrative on health assessment in the Scoping Report includes noise and vibration as a contributing topic that addresses impacts on health. The Council does not consider this to be sufficient. Chapter 6 indicates the intention to use the Design Manual for Roads and Bridges 'standard' approach for the noise assessment. In general terms, this approach sets thresholds of significance for direct health impacts from noise at 3dB change and upwards; however, has commented on other DCO applications that changes below this topic-specific significance level can have adverse health effects, plus differential effects for sensitive members of a population; and all changes should therefore be identified and explored. The need to consider noise in the consideration of noise impacts on health determinants (as set out in the IEMA scoping guidance (Table 5.2)), such as sleep disturbance, annoyance, and anxiety; and to reach the point where it is possible to ensure that committed mitigation can avoid potentially	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. The criteria used in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2** are informed by WHO Guidelines which are cognisant of the health effects resulting from noise. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** assesses noise and vibration impacts in relation to health, with noise being identified to have tangible links to health in places where people reside or work in close proximity to sources of noise. Vulnerable population groups that are more sensitive to noise impacts are identified to be children, people with existing poor health and people with geographic factors (e.g. unemployed, disabled or shift

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			significant population health effects (IEMA scoping guidance para 6.6(3)) are considered important by the Council. This is a further illustration of the Council's broader position, which is that there should be a standalone health assessment in the EIA process to capture all relevant determinants of human health, reported together in a health chapter.	workers who may spend more time at home in close proximity to the Order Limits).
108	Appendix 2 p.114 Chapter 6	Noise and Vibration - Receptors	There is a need for clarification of how this topic will address CEA.	The predicted noise and vibration levels generated by cumulative developments within the defined study area have been considered for shared receptors in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2**. From this, the cumulative assessment has established whether there is potential for the combined noise and vibration levels to give rise to significant adverse effects during all stages of the Proposed Development.
109	Appendix 2 p.114 Chapter 6	Transport and Access - Consultees	In addition to the list of consultees included, consultation with Oxfordshire County Council as a neighbouring authority (and local Highway Authority for Oxfordshire) is required. Additionally, whilst it is stated in the scoping note that no consultation with National Highways is considered necessary, the Applicant must seek confirmation that National Highways do not have	Consultation with both National Highways and Oxfordshire County Council has taken place further detail can be found in the **Consultation Report [EN010158/APP/5.1]**.

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			any concerns regarding construction traffic and the cumulative impacts with other national strategic infrastructure projects (EWR and HS2) particularly at Junction 9 of the M40 and on the A41.	
110	Appendix 2 p.114 Chapter 6	Transport and Access - Consultees	There is a need for this topic to provide clarification of how CES is being undertaken. This includes the interaction of other projects with the baseline (e.g. HS2) and the development and growth assumptions that will be embedded in traffic modelling.	A cumulative assessment has taken place with committed development traffic flows included in the future year baseline assumptions as detailed in **ES Appendix 15.1: Transport Assessment [EN010158/APP/6.4].**
111	Appendix 2 p.114 Chapter 6	Transport and Access - Study area	The Scoping Report states that the study area is to be agreed with the local Highway Authority based on the likely origin and destination points for construction staff and materials. This is acceptable.	The study area has been agreed with the relevant statutory consultees (see **Consultation Report [EN010158/APP/5.1]**).
112	Appendix 2 p.114 Chapter 6	Transport and Access - Characterisation	The Scoping Report lists potential data sources. In addition to these sources, traffic data from the A41 should be sought from the Council. The local Highway Authority (LHA) would support the collection of new traffic data at key junctions and links surrounding the site including any supplementary data required as identified on the A41. The location of additional surveys undertaken must be agreed with the LHA once	The location of traffic counts was discussed in detail with Buckinghamshire Council and the data noted as being suitable for use in the assessment. The location of data sources is provided in **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2].**

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			the study area has been defined. Any new traffic data should be cross checked with older data.	
113	Appendix 2 p.115 Chapter 6	Transport and Access - Receptors/assets/resources	This will be dependent on the routing agreement for construction traffic. Further consideration for residents living along the A41 to the south of the development Site may be required if construction traffic is to route in this direction. There may also be additional parts of the network that are identified as requiring specific analysis once further information is available regarding construction traffic workers and their anticipated movement modes and patterns.	The routing of traffic has been discussed in detail with Buckinghamshire Council and the study area extends along the A41 from the M40 to Waddesdon, as described in **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2].**
114	Appendix 2 p.115 Chapter 6	Transport and Access - Receptors/assets/resources	Additionally, users of Junction 9 of the M40 (Wendlebury Interchange) should be included if appropriate following consultation with Oxfordshire Local Authority and National Highways.	Junction 9 is included in the roads study area network as described in **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2].**
115	Appendix 2 p.115 Chapter 6	Transport and Access - Mitigation measures	This is not agreed. It is expected that the applicant shall consider mitigation requirements to address capacity and safety of the operation of the highway network facilitating two-way HGV movements during the construction period given the proposed scale of the development. The Council does not consider that the mitigation fully addresses the impact of Highways Safety and	Full details of the proposed mitigation illustrating safe and efficient access is provided in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Wear and Tear to the public road network is addressed by a proposed agreement contained in

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			convenience. The ES should include commitment to a full condition survey, agreement to interim repairs and road condition improvements for the construction and decommissioning phases.	the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**
116	Appendix 2 p.115 Chapter 6	Transport and Access - Receptors	The Council considers that the operational phase of the development requires further assessment. The ES must provide details of the access arrangements, traffic generation and parking and manoeuvring arrangements for the site during the operational period.	The traffic generation associated with the operational phase is considered in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4].**
117	Appendix 2 p.116 Chapter 6	Transport and Access - Requirement of Transport Assessment	The TA must consider key transport policies relating to the development proposals. The relevant guidance and policies must be considered at national, regional and local levels. The following documents, amongst others, must be considered: • National Planning Policy Framework • Highways Development Management Guidance: Managing the transport and travel impact of new developments (July 2018) • Buckinghamshire's Local Transport Plan 4 2016-2036 - April 201612 • Vale of Aylesbury Local Plan 2013-2033 - September 2021	These are included in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** and **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2].**

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118	Appendix 2 p.116 Chapter 6	Transport and Access - Requirement of Transport Assessment	The TA must include a review of the local highway network within the vicinity of the site including a review of Personal Injury Accident, (PIA). Data for the latest available five-year period is required. The Local Highway Authority will need to see full PIA details in the TA appendix and the area to be included in the assessment will need to be agreed.	Accident data has been provided at PEIR and in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** and **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2].**
119	Appendix 2 p.116 Chapter 6	Transport and Access - Requirement of Transport Assessment	The TA should identify any necessary mitigation for safety/capacity reasons required on any of the construction routes. Construction traffic should include Heavy Goods Vehicles, Large Goods Vehicles, and staff/operative vehicles.	The **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** details all mitigation. Construction traffic used in the assessment considers LGV, HGV and total flows.
120	Appendix 2 p.116 Chapter 6	Transport and Access - Requirement of Transport Assessment	The Scoping Report confirms that the extent of the study area will be developed from the likely origin and destination points for construction staff and materials. This approach is acceptable although it is confirmed that the study area will be subject to discussion and agreement with the Council. The Scoping Note confirms that existing data sources will be supplemented using new Automated Traffic Count (ATC) traffic surveys to be carried out on all study area roads. The Local Highway Authority would support the collection of new traffic data at key junctions and links surrounding the site. The location of additional	As detailed in **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2]** and reported in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]**, new traffic surveys have been undertaken and their location and dates were discussed with Buckinghamshire Council officers prior to the data being collected.

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			surveys undertaken must be agreed with Council once the study area has been defined. Any new traffic data should be cross checked with older data.	
12 1	Appendix 2 p.117 Chapter 6	Transport and Access - Requirement of Transport Assessment	The Scoping document references the Institute of Environmental Management and Assessment (IEMA) Environmental Assessment of Traffic and Movement (2023). The document notes two rules used for screening the appropriate extent of the assessment area. The first rule is to include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%) and the second is to include highway links of high sensitivity where traffic flows have increased by 10% or more. The Local Highway Authority strongly caution against using this rigid approach. The document referenced is in relation to environmental assessments of traffic and movement and not the capacity and delay impact and it is stated that it is generally accepted by regulators and practitioners that it should not be applied to assessments of road safety and driver delay. Once the changes in flows are known, it is recommended that further engagement is made	The assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN10158/APP/6.2]** is in accordance with the Institute of Environmental Management and Assessment (IEMA) Environmental Assessment of Traffic and Movement (2023). The traffic generation has been discussed with Buckinghamshire Council who did not ask for further assessment techniques.

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			with the Local Highway Authority in order to ensure that there are no links where a significantly lesser change would not be expected to have a significant impact on the junction performance or safety. A mid-level growth estimate must be applied to any junction assessment as standard, and this can be sensitivity tested against low and high growth scenarios.	
122	Appendix 2 p.117 Chapter 6	Transport and Access - Requirement of Transport Assessment	Given that the development shall be a scheme for the delivery of infrastructure and the impacts on the highway are expected to be during the construction phase rather than the operational phase, the Local Highway Authority is not satisfied to leave the Construction Traffic Management Plan to a post permission requirement. The application shall be required to provide detailed analysis of the construction phase and provide a comprehensive assessment. This shall follow the approach taken by the Council in its assessment of the EWR Transport Works Acts Order process.	The **Draft DCO [EN010158/APP/3.1]** requires the production of a full CTMP, based upon the details of the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** The assessment of traffic impact is provided in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4].**
123	Appendix 2 p.117 Chapter 6	Transport and Access - Requirement of	The Transport Assessment shall be required to assess the construction impacts fully given the scale and nature of the development. It is expected that the applicant will consider	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** provides details of the traffic movements, their impact and

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		Transport Assessment	mitigation requirements to address capacity and safety of the operation of the highway network facilitating safe and suitable two-way HGV movements. An assessment of the profile of HGV movements throughout the construction period showing the peak construction periods shall be expected to be submitted as part of the Transport Assessment. Any mitigation or traffic management identified as being required shall be delivered as a permanent installation to ensure that it is reliable and suitable for the duration of the scheme construction. It would be the expectation of the Local Highway Authority to retain the right to determine if any mitigation schemes shall be required to be retained or shall be removed post construction.	capacity of the network to accommodate the peak of development traffic. Mitigation measures are provided in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** The **Draft DCO [EN010158/APP/3.1]** provides a mechanism for works to be approved and would allow the highway authority the ability to state works are permanent or temporary.
124	Appendix 2 p.118 Chapter 6	Transport and Access - Requirement of Transport Assessment	The TA must provide details of the access arrangements, traffic generation and parking and manoeuvring arrangements for the site during the operational period.	The **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** provides details of the access points and their layout. **Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** provides details of the traffic generation.
125	Appendix 2 p.119	Transport and Access - Requirements	A CTMP would be required as part of the application to establish vehicle routing and to	The details requested are provided in the **Outline Construction Traffic Management Plan (CTMP)**

ID	Ref	Description	Consultee's comment	Applicant's response
	Chapter 6	for the Construction Traffic Management Plan (CTMP)	ensure that vehicles can access and egress the site safely during the construction phase. The Council would expect the following information to be contained within a CTMP or plotted on drawings: • Construction access, and demonstration upon a submitted • A construction traffic routing agreement including details of any diversion, disruption or other abnormal use of the public highway during construction works; • Detailed swept path analyses for the main constraint points on the route from the nearest suitable trunk road junction; • An assessment of structures that are to be crossed or used during the build stage and a commitment that any necessary works would be carried out prior to commencement on site; • Details of vehicle holding areas outside the vicinity of the site including details of the vehicle call up procedure; • Work programme and daily timeframes for each phase of the construction works; • A list of delivery vehicles to be permitted for use with dimensions and a swept path analysis of the largest proposed delivery vehicles entering and exiting the site;	**[EN010158/APP/7.5]** and **Appendix 15.1: Transport Assessment [EN010158/APP/6.4].**

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			• Total numbers of construction vehicles to be used throughout the build stage; • Estimate for the daily numbers of vehicles including a breakdown of daily HGVs, LGV and staff/operative vehicles; • Estimate of peak hour construction vehicles including a breakdown of peak hour HGVs, LGV and staff/operative vehicles; • Commitments by the applicant to repair any damage to the highway resulting from construction traffic, to be determined using precommencement and post-construction surveys carried out by the Highway Authority; • Site parking for site operatives' vehicles and loading and unloading areas within the site curtilage and a restriction not to load and unload deliveries upon the public highway; • Commitment to the use of a banksman during access and egress of the site by construction vehicles; and, • Coordination with other development projects in the vicinity; • Convenience facilities • Provision for vehicles pulling off the road • HGV ID tracking systems to include post delivery routes	

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126	Appendix 2 p.119 Chapter 6	Transport and Access - Requirements for the Project Framework Travel Plan (PFTP)	The primary aim of the Project Framework Travel Plan is to set a framework to minimise the adverse environmental impact of worker and visitor travel to and from the construction worksite. The PFTP must take account national, regional and local planning policies and guidance with regard to appropriate best practice guidance for travel planning including consideration of Buckinghamshire Councils, Travel Plans: Guidelines for Developers (July 2022).	The **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** includes a Staff Travel Plan, noting that the travel plan will be contractual requirement for contractors working at site. This has been prepared in line with relevant guidance and experience from other similar schemes**.**
127	Appendix 2 p.119 Chapter 6	Transport and Access - Requirements for the Project Framework Travel Plan (PFTP)	A PFTP must demonstrate that there is sufficient expectation that measures can be brought forward to promote modal shift to sustainable modes for staff travelling to and from the proposed site including minimising the number of single occupancy vehicle journeys made to and from the site.	The Staff Travel Plan that is embedded in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]** and would be a contractual requirement of the contractor and is secured by the **Draft DCO [EN010158/APP/3.1]**
128	Appendix 2 p.120 Chapter 6	Transport and Access - Public Rights of Way (PRoW)	Where the amenity for non-motorised users is considered, this must include PRoWs, especially during construction. This should be scoped into the study, particularly given the size of the development and potential for construction harm over a long period.	PRoWs are considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2],** the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.

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				The traffic impacts on PRoW users have been included in the **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2].**
129	Appendix 2 p.120 Chapter 6	Transport and Access - Public Rights of Way (PRoW)	The impact of cabling on PRoW users and highway maintenance needs to be understood and explained in the ES. The Applicant proposes buried cables 1.5m deep and these will almost certainly, be laid across the PRoWs to connect between solar panels, battery storage and National Grid networks. This will necessitate temporary closures for each PRoW and will require appropriate surface reinstatement, cumulatively, this has the potential to cause significant adverse impacts for users of the PRoW network. The DCO will need to accommodate alternative temporary arrangements for these highway closures [as opposed to the standard temporary traffic regulation order process], as outline at para 2.4.88 of the Scoping Report. The DCO will also need to accommodate alternative permanent arrangements for PRoW diversions [to the standard s257 TCPA 1990 legislative process] as outline at para 2.4.87 of the Scoping Report.	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].** 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.

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				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]**. The **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** indicates the proposed permanent diversions to PRoW as part of the Proposed Development, which include: • diversion of a PRoW in the north of Parcel 3 to align the PRoW with the field boundaries to create space for the Rosefield Substation. • diversion of a PRoW in the east of Parel 2 to align the PRoW with the field boundary. • diversion of a PRoW in the south of Parcel 1 (between Shrubs Wood and Decoypond Wood) to align the PRoW Footpath with the field boundary. • diversions of three existing PRoW in the north west of Parcel 1 to rationalise them into a single PRoW Footpath providing access between Pond Farm and Calvert Road.

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130	Appendix 2 p.120 Chapter 6	Transport and Access - Public Rights of Way (PRoW)	Similarly, with regards to internal access tracks for ongoing monitoring and maintenance, details of the surface specifications along PRoWs shared with employee vehicles will be required, for example, bitumen surfaces may be hard wearing, but they are less desirable for horse riders who find sealed surfaces slippery and unsuitable.	PRoWs are considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2],** the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**. It is not intended that any internal access tracks would follow the alignment of PRoWs. The final detail of access track construction will be finalised at the discharge of Requirements, but at present **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** indicates that they would be permeable material (assumed to be compacted gravel). It is not intended that the surface of PRoW would be altered as part of the Proposed Development.
131	Appendix 2 p.120 Chapter 6	Transport and Access - Public Rights of Way (PRoW)	Given the proximity of HS2 and Calvert landfill railway sidings on PRoWs, the interface between the solar farm and the Calvert/Grendon Underwood crossings within the HS2 Act should be mapped, to ensure identification of strategic connectivity, enhancements, and improvements. This includes [1] the Calvert cycleway from Calvert village to the 'CAG/3 Underpass', passing through the area covered by the Calvert Sidings Transport and Works Act Order; [2] additional bridleways proposed around the	PRoWs are considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2],** the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**. The proposed changes to the existing PRoW through the Site 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

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			Calvert landfill perimeter; [3] the wider Buckinghamshire cycleway project [Hillingdon to Brackley]; and [4] new pedestrian footways provided by HS2 between Calvert and Steeple Claydon [Addison Road]. The access improvements included within the final restoration plan and s106 Agreement for the Calvert landfill site [11/20000/AWD], and access impacts of the proposed Calvert Solar Farm [CM/0016/21] will also be important.	existing PRoW network at the Order Limits. Therefore, the routes would be on their current alignment at the interface with the HS2 works. PRoW in the north west of the Site would be diverted to allow easier access to the new footway created along Addington Road to Steeple Claydon, which will also continue to Calvert.
132	Appendix 2 p.121 Chapter 6	Population - Baseline characterisation	The Council notes that para. 2.3.10 excludes Population from the list of topics for which a high level overview of existing conditions is provided. This does not therefore contribute to the understanding of the Site. This gap needs to be addressed since it is important for the existing settlement characteristics and distribution of residential development within the landscape to be understood, such that there is an adequate baseline for considering the impacts of the Proposed Scheme on established neighbourhood characteristics.	Population was subsequently scoped into the EIA and is reported in **ES Chapter 14: Population [EN010158/APP/6.2]**. This includes a review of the population (demographic, economic and social) baseline conditions and characteristics to inform the sensitivity of the receptors.
133	Appendix 2 p.121 Chapter 6	Population - Baseline characterisation	Census 2021 data should be used to inform the baseline, together with consultation with relevant Council officers to understand specific socio-	Census 2021 data has been used to inform the baseline within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. **Section 14.3**

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			economic and demographic challenges and priorities relevant to the study area.	sets out the approach to stakeholder engagement.
134	Appendix 2 p.121 Chapter 6	Population - Scope and methodology – proposed replacement with the IEMA Human Health methodology (scoping and determining significance)	Section 6.9.1 of the Scoping Report indicates that the focus of the scoped in parts of the Population assessment will be on PRoW. It is noted that this includes the intention to consult with the Council's PRoW officer, which is supported and considered essential. However, the Council has comments on the way in which PRoW assessment is conducted and reported.	Buckinghamshire Council and the Applicant agreed on the approach to PRoW diversion and the alignment of permissive paths. These matters are addressed in the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**.
135	Appendix 2 p.122 Chapter 6	Population - Scope and methodology – proposed replacement with the IEMA Human Health methodology (scoping and determining significance)	Para. 6.9.2 of the Scoping Report states the intention to use Design Manual for Roads and Bridges (DMRB) LA112 Population and Human Health standard to shape the methodology for the assessment, but essentially only the population element. There is no attempt made to justify why the Human Health element of the LA112 standard is not covered. The Council is of the opinion that this is not the best suited standard (methodology) for considering impacts on people for NSIP solar power projects. DMRB is intended for application to linear strategic transport infrastructure	As highlighted within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**, DRMB LA 112 gives some direction and context for assessing impacts of a development on population which was reviewed and adapted for the assessment within this chapter. Between the PEIR and ES stages, the Applicant has amended the methodology to address population-related effects within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**, and addressing human health within other topic specific ES assessments and summarised within

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			proposals and many of the aspects of the methodology are not commonly transferable/applicable to a site based non-transport project. This is evidenced in the considerable amount of sub-topic coverage of DMRB LA112 that the Applicant proposes to scope out. The Council recommends that the Applicant changes the proposed approach – instead of using the DMRB LA112 Population aspect, the Council advocates replacing the Population topic chapter with a Human Health topic chapter following the IEMA November 2022 guidance. This would allow for the scoped in population aspects (discussed further below) to be considered alongside the broader range of relevant impacts on determinants of human health.	the **Health and Wellbeing Summary Statement [EN010158/APP/6.4].** While DMRB LA 112 is referenced as one source of guidance for these assessments, it is not considered to be an appropriate methodological resource for assessing population or human health effects alone for a solar project. A separate **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This summary statement is in line with 2022 IEMA guidance, with the statement focused on significant residual adverse effects identified through the EIA process which could have an impact on human health at a population level and, if relevant, a sub-population level (not an individual level).
136	Appendix 2 p.122 Chapter 6	Population - Scope and methodology – proposed	The Applicant does propose to scope consideration of PRoW into the assessment. At 6.9.5 of the Scoping Report there is an assumption that PRoW are used regularly and	The PRoWs that are set to be temporarily diverted/closed or permanently diverted during the construction period are set out in the **Outline Rights of Way and Access Strategy**

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		replacement with the IEMA Human Health methodology (scoping and determining significance)	chapter 2 of the Scoping Report lists the extensive network of routes that are within and proximate to the Site (2.3.18, supported by Plans in Appendix C). The Council considers that there is a need to have actual survey data to identify the baseline more effectively, particularly noting that the number of bridleways in the study area may mean that cycle and equestrian users merit specific consideration; and this should be added to the methodology. This is a comment that was also made by PINS in the Scoping Opinion issued in respect of West Burton which, at para. 3.9.4 states that due to the number of PRoW affected, '*surveys should be undertaken to provide baseline data in relation to the use of the PRoWs affected by the site where appropriate to define the change in characteristics of tourism and recreational use of the PRoW as is required to define receptor sensitivity*.'	**[EN010158/APP/7.8]** and the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4]**. Survey data on PRoW use was not included within the scope of the EIA given the understanding developed from policy designation and community feedback on the status of routes which was considered sufficient to define their sensitivity. This is in accordance with guidance produced by the Institute of Public Rights of Way and Access Management (IPROW) (2020) ("*Environmental Impact Assessment: A guide to how PRoW and other outdoor access resources should be assessed in EIA*") which notes that "*It is rarely possible to set quantitative benchmarks for sensitivity*" and provides examples for receptor sensitivity rating that do not include the need for survey information.
137	Appendix 2 p.123 Chapter 6	Population - Scope and methodology – proposed replacement with the IEMA Human Health methodology	In addition, the Council considers that the Applicant should clarify how the DMRB LA112 approach to PRoW assessment (which is principally concerned with impacts on journey length on a quantitative basis) addresses any aspect of user amenity, which is an additional dimension in terms of impacts on health determinants. This should supplement the	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates

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		(scoping and determining significance)	passing reference made in para. 6.9.7, explaining how mental health and well-being are to be considered – the Council's preference would be to see all aspects of PRoW user experience brought together into the human health chapter (i.e. remove from the transport and access element, as currently drafted).	regard and consideration of guidance on the assessment of effects on health. The statement includes a specific reference to the in-combination/inter-project effects related to health and wellbeing of users of PRoW, drawing together the assessment of accessibility and environmental amenity reported throughout the ES. Section 14.6 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** provides clarity on where effects on PRoW and their users are considered within the ES, as follows: **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** assesses effects related to users of PRoW as follows: • Severance of communities (for example, as a result of changes in traffic flows on roads crossed by PRoW); • Pedestrian delay (for example, where this relates to changes in traffic flows interacting with paths used by walkers, cyclists and horse riders); • Non-motorised user amenity (for example, where users of the highway including walkers, cyclists and horse riders may experience

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				change in journey time or amenity as a result of a change in traffic flows); and • Fear and intimidation (for example, where changes in traffic flow, heavy vehicle composition, the speed at which vehicles are passing and the proximity of traffic to people discourages walkers, cyclists and horse riders from using PRoW). **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** considers changes in environmental amenity experienced by users of PRoW. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** considers the ability for people to continue to use PRoW for recreational and connectivity purposes, in order to access commercial, recreational, community facilities and social networks and to undertake recreational active travel as intended by the purpose of the PRoW. It considers whether the PRoW network is affected by temporary disruption (for example iterative closure) or diversion which would increase journey length.

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138	Appendix 2 p.123 Chapter 6	Population - Scope and methodology – proposed replacement with the IEMA Human Health methodology (scoping and determining significance)	The Scoping Report indicates that agricultural land use will also be scoped into the Population assessment, using the DMRB LA112 method. This will cover the physical loss of agricultural land and how it affects farm viability; however, without incorporating the human health dimension, this approach will not consider mental health and well-being impacts associated with changes to agricultural businesses and uncertainty around future viability, for example. This should be incorporated into the assessment and should include the cumulative loss of agricultural operations within the area.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. Mental health and wellbeing impacts on farmers and agricultural workers is considered when looking at the Socio-economic effects in 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** (Paragraphs 3.7.1 to 3.7.35). Effects on the agricultural economy and operations are assessed in Table 17.8 and Paragraphs 17.7.73 to 17.7.82 in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**
139	Appendix 2 p.123 Chapter 6	Population - Scope and methodology – proposed replacement with the IEMA	Para 6.9.11 of the Scoping Report refers to a separate socio-economic statement to be prepared. There is no commitment to then using this to inform the impacts of the scoped matters (agricultural loss, construction workers, operational workers, spend and impacts from	A 'Socio-economic Statement' was initially proposed in support of the DCO Application outside of the DCO process, to contain information on the potential loss of permanent jobs, the creation of new temporary and

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		Human Health methodology (scoping and determining significance)	temporary workers) on determinants of health affecting the existing and affected population. The Council is of the opinion that this does merit consideration in the EIA process and the PEIR should expand on the detail.	permanent jobs and the effect on the local economy. However, as set out in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4],** the Planning Inspectorate stated that an estimate of the number and types of jobs created should be provided in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. Furthermore, consideration of potential impacts should include the availability of local accommodation and services. These matters were therefore scoped into the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** assessment, and the proposed 'Socio-economic Statement' was therefore not produced. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. Impacts on agricultural loss, construction workers, operational

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				workers, spend and impacts from temporary workers are considered when looking at the Socio-economic effects in 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**.
140	Appendix 2 p.124 Chapter 6	Population - Promoted recreational routes	Promoted routes passing through or near the development include the North Buckinghamshire Way and Bernwood Jubilee Way. The Claydon Woods Circular walk and ride is also located within the site and is a popular promoted route. The attractiveness of any long-distance walk is strongly dependant on the likelihood of finding a pleasant environment in which to pass. The prospect of walking through a solar farm may deter visitors from attempting certain stages of these walks or rides. Therefore, the impact on the attractiveness of promoted routes needs to be assessed, including the proximity of the solar panels and battery storage areas and generous widths for routes would be required in mitigation. While it is appreciated PRoWs beyond the 5km range across all three phases will potentially have a reduced impact due to the low likelihood of the proposed development being observed from distant views [and therefore proposed to be scoped out of the assessment], concerns remain	The effects on the attractiveness of PRoW routes to walkers, cyclists and horse riders in light of the Proposed Development are considered within other topic specific assessments. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** assesses effects relating to severance in communities, pedestrian delay, non-motorised user amenity and fear and intimidation, while **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** and **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** assess changes in visual and environmental amenity experienced by users of PRoW, respectively. This includes an assessment of North Buckinghamshire Way/Midshires Way and Bernwood Jubilee Way (including the Claydon Woods Circular walk). Effects related to community severance, pedestrian delays, reduced amenity for non-motorised users, and feelings of fear or

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			that because of the long-distance nature of these routes, they will become less attractive for walkers, cyclists and horse riders passing within then outside the 5km threshold. The impact on all promoted routes should be scoped in with regards to the operational phase.	intimidation—alongside changes in visual and environmental quality experienced by users of public rights of way—will influence the overall attractiveness of local walking routes.
14 1	Appendix 2 p.124 Chapter 6	Population - Promoted recreational routes	Assessing the environmental impact of measures to make routes more attractive, such as proposed hedgerows using locally native species and fruiting and nut-bearing species for foraging opportunities, will be worthwhile. However, this needs to be balanced with the maintenance liability for the owner/occupier and the impact of hedges left uncut on the walking amenity, such as reduced widths. Mitigation could focus on making areas a destination for foragers to access high quality routes and there may be accompanying economic benefits for local businesses. These matters would most appropriately be addressed through a Human Health topic chapter as this allows for the complex interactions of impacts to be considered in an inherently cumulative assessment methodology.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. Specific mitigation measures related to impacts on PRoW are outlined in the 'Effects on Traffic, Transport and Access' (Paragraphs 3.6.17 to 3.6.19) subsection of the 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**. These measures are outlined in the **Outline CTMP [EN010158/APP/7.5], Outline Rights of Way and Access Strategy [EN010158/APP/7.8], Streets, Rights of Way and Access Plans [EN010158/APP/2.4], Outline LEMP**

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				[EN010158/APP/7.6] and the **Draft Development Consent Order [EN010158/APP/3.1]**. The **Outline LEMP [EN010158/APP/7.6] and Outline OEMP** includes detail relating to the management and maintenance of vegetation with regard to PRoW.
142	Appendix 2 p.125 Chapter 6	Human Health - Inclusion as a standalone topic chapter	The Council does not support the approach proposed by the Applicant in respect of addressing health impacts of the Rosefield Solar Farm (see Chapter 5 comments). This is an overarching point relating to the methodology. The Council advocates the replacement of the Population chapter with a Human Health chapter, re-scoped in accordance with the IEMA guidance on scoping of health assessment in EIA; with the intention of applying the assessment of significance of health effects in accordance with the IEMA guidance on determining significance for human health in EIA.	The Applicant has considered effects on human health inherently within the EIA and other related assessments, management plans and documents within the DCO application, in-line with the proposed approach set out within the Scoping Report, and in accordance with the Scoping Opinion provided by PINS. The approach taken is also compliant with the EIA Regulations, which require that direct and indirect significant effects of the proposed development on population and human health should be identified, described and assessed in an appropriate manner, in light of each individual case. In order to draw together and summarise the Proposed Development's effect on human health, following feedback from statutory consultees the Applicant has also provided a **Health and Wellbeing Summary Statement**

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				[EN010158/APP/6.4] within the Environmental Statement. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This summary statement is in line with 2022 IEMA guidance on the effective scoping of human health in EIA and determining significance, with the statement focused on significant residual adverse effects identified through the EIA process which could have an impact on human health at a population level and, if relevant, a sub-population level (not an individual level). The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** confirms that there would not be significant residual effects on human health.
143	Appendix 2 p.125	Human Health - Inclusion as a	Para. 3.5 of the same guidance acknowledges that EIA scoping should be proportionate and where all relevant determinants of health are scoped out, the scoping report should include	At an early stage, the Applicant advised of its intention to consider effects on human health through individual topic chapters within the Environmental Statement (ES) – **ES Volume 3,**

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	Chapter 6	standalone topic chapter	the justification for scoping out each wider determinant of health, as well as a clear explanation for the overall scoping out of health as an EIA topic. Para 3.10 indicates that '*where the implications of other EIA technical topics for population health are not clear at the scoping stage, then an EIA Report health chapter should be included*'. Further, para. 3.11 states '*the practice of solely relying on other EIA technical chapters to provide the coverage of human health (i.e. disparate discussion of health issues across the EIA Report), is not recommended and should not be the justification to scope out health in EIA*.' The Council is of the opinion that the Scoping Report as presented does seek to follow this approach, and the Council does not consider the Applicant's proposed approach to be satisfactory.	**Appendix 5.1: Scoping Report [EN010158/APP/6.4]**. The Scoping Opinion (**ES Volume 3, Appendix 5.2: Scoping Opinion [EN010158/APP/6.4])** received from the Planning Inspectorate (PINS) confirmed that this approach was acceptable but flagged that the ES should clearly set out potential impacts to human health and cross-reference to where impacts are assessed within the ES which has been completed. Refer to response to Item 142 (above).
144	Appendix 2 p.125 Chapter 6	Human Health - Inclusion as a standalone topic chapter	The Council believes that the IEMA approach to health assessment more appropriately translates to the consideration of the potential for effects of a solar DCO development on relevant determinants of human health and could adequately incorporate the few elements of DMRB LA112 that have been scoped in for consideration by the Applicant. As part of this, the Council expects that the Applicant would	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** adopts the IEMA approach as set out within the latest 2022 guidance by focusing on significant residual adverse effects identified through the EIA process that could potentially have an impact on human health and the population and sub-population levels.

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			then cross-refer to relevant data within the topic assessments that the Applicant is currently relying upon, but that these would be considered through the specific lens of impacts on health determinants and consequential effects and mitigation; to be reported in a dedicated health topic chapter in the ES.	Within the 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4],** data of relevance within topic assessments is cross-referred to when considering impacts of health determinants and associated mitigation measures. Refer to response to Item 142 (above).
145	Appendix 2 p.126 Chapter 6	Human Health - Inclusion as a standalone topic chapter	In the review of precedent undertaken by the Council in preparing this response, it is noted that within the PINS Scoping Opinion for the Tillbridge Solar Project, the Inspectorate supported the scoping in of a standalone health assessment within the ES (para. 3.6.2). Further, the Inspectorate stated that '*the ES should provide significance criteria for this assessment so that reader can understand the potential of any significant effects arising from the health assessment.*' (3.6.2). This advice was issued in November 2022, pre-dating the publication of the IEMA guidance in the same month – this guidance provides significance criteria that the Council asserts that the Applicant should use. In addition, the Inspectorate also stated that the ES should consider vulnerable populations within the health assessment (3.6.3). This is an	Within the 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**, the significance of residual impacts is reported for each relevant topic area and assessment. For each health and wellbeing determinant/pathway, specific sensitive and vulnerable populations/groups are identified. Data on these vulnerable groups is also collected as part of the baseline which includes a mixture of data from the 2021 Census, ONS and PHE Fingertips.

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			element that the Applicant has not addressed – the Council would wish to see analysis of vulnerable populations within the updated baseline assessment presented at the PEIR. This analysis should be informed by consultation with the Council's specialist officers.	
146	Appendix 2 p.126 Chapter 6	Human health - Scoping determinants of human health	Table 5.1 of the IEMA guidance on scoping human health assessment sets out an indicative list of wider determinants of human health and could usefully be used to guide the Applicant. Para 3.2 of the same document advises that '*the Scoping Report should state why relevant determinants of health are scoped in or out, based upon specific factors described in the guide…[and]…may also refer to the temporal or geographical scope of the health assessment, the methods to be used, the health outcomes expected, and indicate how the community has been/will be engaged throughout the EIA and planning process*'. The Applicant should provide this information at PEIR, ideally having consulted with the Council in the preparatory stage.	Table 5.1 of the IEMA guidance on scoping human health assessment has been included within the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** and has been used as a guide when looking at specific environmental effects and health pathways. When analysing health impacts for each specific topic area, the relevant health and wellbeing determinants/pathways are summarised.
147	Appendix 2 p.126 Chapter 6	Human health - Scoping determinants of human health	Para. 1.1.4 of the Scoping Report cross-refers to Appendix A as showing the maximum extent of land that would be included within the DCO application, noting that this covers all the options	Each chapter within **ES Volume 2, Chapters 6 to 17 [EN010158/APP/6.4]** considers the elements of the Proposed Development that represent the 'worst case' in terms of the extent and

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			for components and is likely to be refined (Para. 2.3.2 clarifies that Appendix A shows the area of land potentially requires for construction, operation, maintenance and decommissioning). Para 2.2.7 cross-refers to Appendix B as displaying the locations of the potential development and mitigation and/or enhancement as states that the worst-case scenario for each receptor has been 'assessed' in the Scoping Report. The Council would like the Applicant to confirm that this covers all areas of off-site works that may be needed, as these will need to be included within the assessment.	significance of impacts on receptors, under section X.6 'Approach to the Assessment' in each chapter. All areas of works included within the Order Limits have been considered within the assessments.
148	Appendix 2 p.127 Chapter 6	Human health - Scoping determinants of human health	Para. 2.3.5 of the Scoping Report identifies the proximate settlements as Calvert, Middle Claydon, Botolph Claydon (directly to the north of Parcel 2 (2.3.7)), East Claydon (proximate to Parcel 3, and the National Grid substation (para 2.3.7)) and Hogshaw, Steeple Claydon, Edgecott, Shipton Lee, Quainton, Granborough, Winslow, citing a 3km distance from the site. Conservation Areas within some of these settlements exist and are noted in para 2.3.28. The Council expects that the human health study area would incorporate all of these settlements, which should be characterised.	As part of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**, a baseline assessment has been undertaken to set the local context and to identify local health priorities. For the purposes of the baseline, data was collected for the local ward areas (Great Brickhill, Grendon Underwoods and Winslow wards), Buckinghamshire (including all of the settlements listed), the South East region and England. When looking at specific health pathways, study areas differ by each topic assessment to account for the guidance, thresholds and receptors relevant to health pathways for each topic-specific effect.

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149	Appendix 2 p.127 Chapter 6	Human health - Scoping determinants of human health	Para. 2.4.1 of the Scoping Report provides an overview of the elements that form the main features of the Proposed Development. These include a number of items that have the potential to affect determinants of health. The ancillary infrastructure includes elements that will merit consideration, particularly for the closest communities, for example, lighting, landscaping and boundary treatments, as well as highway works. The underground cabling work proposed will also be disruptive in the construction phase – para. 2.4.58 notes that open-cut trenching would be used for the majority, subject to any requirements for deeper trenches or specialist approaches where road crossings are needed, or environmental receptors necessitate a different approach. These elements all require consideration in terms of their potential to exert impacts on human health determinants.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development as defined by **ES Volume 2, Chapter 3: Proposed Development Description [EN010158/APP/6.2]**. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. Health impacts due to underground cabling and ancillary infrastructure are also considered within the 'Environmental Effects and Health Pathways' section of the Summary Statement. Each technical chapter within the **ES Volume 2, Chapters 6 to 17 [EN010158/APP/6.4]** considers the elements of the Proposed Development within this area that represent the 'worst case' in terms of the extent and significance of impacts on receptors.
150	Appendix 2 p.127 Chapter 6	Human health - Scoping determinants of human health	Para. 2.4.36 of the Scoping Report provides a description of the activities that are proposed for the Rosefield substation, which includes a control building, office space, material storage, welfare and parking alongside other equipment. This is likely to be the part of the operational site	Each chapter within **ES Volume 2, Chapters 6 to 17 [EN010158/APP/6.4]** considers the elements of the Proposed Development within this area that represent the 'worst case' in terms of the extent and significance of impacts on receptors.

ID	Ref	Description	Consultee's comment	Applicant's response
			that is the focus of movements and daily activities, as well as containing the tallest elements (some equipment up to 15 m in height) and it will be enclosed by permanent palisade steel fencing up to 3m in height (para. 2.4.60) together with pole mounted CCTV (up to 5m in height) (para. 2.4.61). The impacts of these aspects of the operational phase will be of greatest relevance to the communities proximate to its location as they will introduce activities and visual characteristics incongruent with the agricultural landscape. This needs to be adequately reflected in the scoping of the potential for effects on determinants of health.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development, sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health.
151	Appendix 2 p.128 Chapter 6	Human health - Scoping determinants of human health	Para. 2.4.43 of the Scoping Report states that the BESS typically comprises a number of shipping container units, which could either be individual enclosures or housed in a large building. Given the nature of the BESS, it is anticipated that the heating, venting and air conditioning and electrical equipment are likely to give rise to localised noise/hum – this can be a cause of disturbance and annoyance for some human receptors, including users of PRoW (human and equestrian impacts will be relevant)	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This includes an assessment of health impacts related to Battery Failure, Plume Assessment and Fire, which is informed by the **BESS Plume Assessment [EN010158/APP/7.13]**. The potential localised noise/hum that could be generated given the

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			and needs to be appropriately reflected within the scope of the health assessment.	nature of BESS is also assessed within **ES Volume 2, Chapters 13: Noise and Vibration [EN010158/APP/6.4]** and the 'Noise and Vibration' sub-section of the 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**. It is concluded that following the application of additional mitigation measures as outlined in within the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3], Outline DEMP [EN010158/APP/7.4]**, **Outline CTMP [EN010158/APP/7.5] Works Plans [EN010158/APP/2.3] and the Design Commitments [EN010158/APP/5.9]**, the predicted operational phase noise levels throughout daytime and night-time periods would not exceed 35 dB LAr,T at any receptors and would therefore comply with LOAEL criteria within Planning Practice Guidance.
152	Appendix 2 p.128 Chapter 6	Human health - Scoping determinants of human health	Para. 2.4.50 of the Scoping Report indicates that the principal access route for the Site would approach from the south-west, from the M40 corridor via the A41. This is stated as bypassing the 'sensitive' communities of Calvert, Quainton, Botolph Claydon and East Claydon. Para. 2.4.51	Details of the access strategy for all stages of the Proposed Development are provided in **ES Volume 2, Chapter 3: Proposed Development Description [EN010158/APP/6.2].** Health impacts on principal access routes and the formation of these routes are summarised in the

ID	Ref	Description	Consultee's comment	Applicant's response
			states that the principal access junction will be located on Quainton Road. BESS access will be on Granborough Road, west of Lower Farm. Both of these are accessed via the A41, South Station Road, Snake Lane and Quainton Road. Paras. 2.4.52 and 2.4.54 both state the intention to liaise with Buckinghamshire Council to confirm the access strategy and arrangements, including the arrival of Abnormal Indivisible Loads (AILs). It will be important to ensure that sufficient health assessment is undertaken to inform the formation of these routes and any associated mitigation strategies required.	'Effects on Traffic, Transport and Access' sub-section of the 'Environmental Effects and Health Pathways' section (Paragraphs 3.6.1 to 3.6.19) of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**.
153	Appendix 2 p.128 Chapter 6	Human health - Mitigation - initial proposals	Para. 2.4.70 of the Scoping Report indicates that the combined construction and commissioning period could be between 24 and 30 months (18-24 months of construction, then 6 months of commissioning). 2.4.71 identifies the types of construction activities. 2.4.78 and 2.4.79 commit to the provision and securing of an oCEMP – this is welcome and should be used as a means of addressing interventions that can lessen health effects on communities, for example, around control of the use of roads during construction and operation; and a well-conceived communication and engagement strategy that is inclusive in terms of the techniques used, seeks	The **Outline CEMP [EN010158/APP/7.2]** is highlighted within the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** as a means of addressing any adverse health impacts on communities. Community liaison is also secured within that document and 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.

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			to avoid community anxiety and provides effective means for community member concerns to be heard and issues resolved swiftly.	The **Outline DEMP [EN010158/APP/7.4]** also acts as a means of addressing adverse health impacts on communities within the decommissioning phase.
154	Appendix 2 p.129 Chapter 6	Human health - Mitigation - initial proposals	Para. 2.4.81 of the Scoping Report indicates that an oCTMP will be submitted in support of the DCO. The stated aims are to ensure road safety and effectively manage disruption. The scope may need to be broadened in response to the findings of the environmental assessment work at the PEIR stage and the Council wishes to see further definition of the proposed controls at this stage. The Council would also like to see a commitment to this also being secured through a DCO requirement, as per the oCEMP.	The **Outline CTMP [EN010158/APP/7.5]** is one of the management plans used within the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** which has been produced to avoid, reduce or monitor and manage environmental effects with an inherent and specific consideration of the health implications on populations and sub-populations of those environmental effects. The **Outline CTMP [EN010158/APP/7.5]** is of particular relevance within the 'Air Quality', 'Noise and Vibration' and 'Traffic, Transport and Access' sub-sections of the 'Environmental Effects and Health Pathways' section of the summary statement. The CTMP is secured via the DCO for the Proposed Development, in that no part of the authorised development can commence until a CTMP is submitted to and approved by Buckinghamshire Council. All associated construction works must then be carried out in accordance with the approved CTMP.

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				The DEMP is also secured via the DCO for the Proposed Development, in that decommissioning works can be carried out until the DEMP is submitted to and approved by Buckinghamshire Council, in consultation with the Environment Agency and Natural England. All associated construction works must then be carried out in accordance with the approved DEMP.
155	Appendix 2 p.129 Chapter 6	Human health - Mitigation - initial proposals	Para. 2.4.84 of the Scoping Report relates to the Outline Operational Environmental Management Plan (oCEMP). The Council welcomes a commitment to this – it should also be secured by a DCO requirement. At the PEIR stage, the Council would wish to see additional detail on the controls to be incorporated to minimise the impacts on the environment.	The **Outline CEMP [EN010158/APP/7.2]** is one of the management plans used within the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** which has been produced to avoid, reduce or monitor and manage environmental effects with an inherent and specific consideration of the health implications on populations and sub-populations of those environmental effects. The **Outline CEMP [EN010158/APP/7.2**] is of particular relevance within the 'Construction/Operational Activity, Behaviours, Health and Safety', 'Air Quality', 'Noise and Vibration', 'Landscape ad Visual' and 'Major Accidents and Disasters' sub-sections of the 'Environmental Effects and Health Pathways' section of the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]**.

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				The CEMP is secured via the DCO for the Proposed Development, in that no part of the authorised development can commence until a CEMP for that part is submitted to and approved by Buckinghamshire Council, in consultation with the Environment Agency. All associated construction works must then be carried out in accordance with the approved CEMP. The Outline OEMP **[EN010158/APP/7.3]** is another management plan that was drafted to provide a clear and consistent approach to the control and operational and maintenance services. This plan is also used within the **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** in order to reduce or avoid environmental effects with specific consideration being given to health implications on populations and sub-populations of those environmental effects. The **Outline OEMP [EN010158/APP/7.3]** is of particular relevance within the 'Construction/Operational Activity, Behaviours, Health and Safety', 'Air Quality', 'Noise and Vibration', 'Landscape ad Visual' and 'Major Accidents and Disasters' sub-sections of the

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				'Environmental Effects and Health Pathways' section of the summary statement. Similarly, the detailed OEMP will be secured via the DCO. Prior to the date of final commissioning for any part of the authorised development, an OEMP for that part must be submitted to and approved by Buckinghamshire Council, in consultation with the Environment Agency. The OEMP must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.
156	Appendix 2 p.129 Chapter 6	Human health - Mitigation - initial proposals	Paras. 2.4.87 and 2.4.88 of the Scoping Report relate to the management of PRoW throughout the construction and operation of the Proposed Development. The Council welcomes the commitment to an Outline Public Rights of Way Management Plan (oPRoWMP); however, it will be important for the Applicant to provide further information about what this will cover and how it addresses health effects, ideally at the PEIR stage, rather than waiting for the ES.	Specific mitigation and enhancement measures in relation to the management of PRoW is taken from the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** which is referred to within the 'Traffic, Transport and Access' sub-section of the 'Environmental Effects and Health Pathways' section of the summary statement. Within this sub-section, reference is also made to how this mitigation and enhancements will address health effects, with the approach set out within the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8]** ensuring safe access across the Order Limits for pedestrians, cyclists and equestrians.

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157	Appendix 2 p.130 Chapter 6	Human health - Mitigation - initial proposals	Para. 2.4.89 of the Scoping Report acknowledges the need to address battery safety around the BESS element of the Proposed Development. This is an important matter in relation to health and further information will need to be included in the PEIR to enable an understanding of the level of risk and how it is managed. This is in the interests of safeguarding physical health. The overall assessment will need to be reported in the ES.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This includes an assessment of health impacts related to Battery Failure, Plume Assessment and Fire, which is informed by the **BESS Plume Assessment [EN010158/APP/7.13]** and **the Outline BESS Management Plan (Outline BSMP) [EN010158/APP/7.9]**.
158	Appendix 2 p.130 Chapter 7	Cumulative Effects	In general terms, the Council welcomes the inclusion of a CEA process. The Council accepts the definition of the types of cumulative effects identified for consideration within this part of the EIA process; and the overall approach proposed to assessment. The inter-project and intra-project definitions are understood at a high level but would benefit from expansion in the PEIR and ES.	Refer to **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
159	Appendix 2 p.130	Cumulative Effects	The inter-project methodology is described more fully than the intra-project. The Council requires further clarification of how the intra-project	The methodology used sets out in detail the intra-project combined effects assessment along with the inter-project methodology in **ES Volume 2,**

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	Chapter 7		cumulative effects assessment will be undertaken. It is suggested that the topics should address intra-project cumulative effects that may arise within their topic scope (e.g. more than one impact affecting the same receptor or biophysical feature); and clarify where the topic methodology itself already incorporates consideration of intra-project cumulative effects (e.g. the agricultural assessment is typically a product of combined impacts of loss of soils or land, severance, drainage and access). The cumulative effects chapter should then summarise findings from the topic assessments then extend the CEA to cover the intra-project cross-topic effects (i.e. where a receptor or biophysical features experiences more than one different type of impact, resulting in a different or more acute combined effect).	**Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. The intra-project combined assessment sets out the receptors that each topic effects and if more than one topic effects a receptor in table format.
160	Appendix 2 p.130 Chapter 7	Cumulative Effects	It is also noted that if the Applicant resists the Council's suggestions in terms of changing the health assessment approach, it may be possible to use the intra-project cross-topic CEA to provide a fuller consideration of relevant elements of the in-combination impacts that contribute to effects on determinants of human health. If the Applicant wishes to adopt this approach (noting that it would be a hybrid and not as readily supported as the IEMA guidance	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the Proposed Development, sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health.

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			that the Council advocates as a preference), the Council would wish to be directly consulted on developing a suitable methodology.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** also includes a section on in-combination and cumulative effects, which provides a comprehensive overview of all significant (moderate and above) and minor in-combination and cumulative environmental effects identified in the Environmental Statement (ES). It evaluates these effects in relation to public health, following relevant guidance. Notably, it includes a new, consolidated assessment of in-combination effects on Public Rights of Way (PRoW) users, which had not been previously presented in a single location within the ES.
16 1	Appendix 2 p.130 Chapter 7	Cumulative Effects	In terms of inter-project effects, the Council wishes to see details of the projects that are to be considered. Para. 2.3.6 of the Scoping Report notes that an HS2 works area is adjacent to the western edge of Parcel 1 and 1a and is currently under construction. Para. 2.3.7 indicates that there is a conflict between the Rosefield Solar Farm and the mitigation planting of HS2 (50m incursion along the western boundary). Mitigation planting for HS2 runs along the PRoW in the centre of the Parcel 1A Site – this highlights a further conflict. EWR is also referenced within the Scoping Report. The Applicant needs to be explicit about the full list of	Table 17.3 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** sets out the projects considered within the inter-project cumulative assessment. These were agreed with Buckinghamshire Council.

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			projects that are to be assessed and provide clear assumptions about how they interact with the Proposed Development, both spatially and temporally. This should be supported by consultation with relevant stakeholders and referenced to publicly available documents (e.g. planning documents) as appropriate.	
16 2	Appendix 2 p.131 Chapter 7	Cumulative Effects	The cumulative assessment methodology taken for each specialist topic should be explicitly set out in the PEIR, enabling further comment. The methodology and proposed scope of the standalone CEA chapter will also need to be expressed, showing clearly the terminology and interaction between all of the different aspects of intra-project and inter-project CEA, both at the topic and cross-topic scale.	**ES Volume 2, Chapter 17 [EN010158/APP/6.2]** sets out the methodology and scope of the cumulative effects assessment.
Cadent Gas Limited				
1	Appendix 2 p.132	N/A	I can confirm the projects falls outside of Cadent's operational area and as such does not have any comments.	Noted.
East Claydon Parish Council				
1	Appendix 2 p.136	Alternative Designs	Rosefield Energyfarm Ltd proposes to develop a solar power station on 875.47 ha (2,163 acres) of farmland across the East Claydon Valley and	**ES Volume 2 [EN010158/APP/6.2]** and associated **ES Volume 3 [EN010158/APP/6.3]** and **ES Volume 4 [EN010158/APP/6.4]** present a

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	Chapter 1		beyond. A development on this scale would have a huge impact on the environment, biodiversity, the farming community, local businesses and the well-being of neighbouring communities. Drawing on local experience and expertise, it is the view of the East Claydon Council that the Scoping Report (hereafter, 'the report') fails to address many of the key issues implicit in its proposals as follows: The Applicant suggests that it is "likely" that installation of a solar energy station is beneficial to the environment but provides no evidence of this, nor is there consideration either of alternative approaches to energy generation or alternative sites for the proposed scheme. Throughout the report, the use of language lacks precision. This leaves the reader unclear as to the quality of data presented and, hence, the basis for the Applicant's assumptions and intentions. Notably, 'Site' is used variously to describe the overall development area of 875 ha or sub-parcels of land within that area. Matters are further confused by changing the scope of those sub-parcels between different sections of the report. Moreover, the report does not recognise potential interactions between the site proper and its immediate surroundings. This approach undermines the entire basis for	full assessment of the likely significant effects of the Proposed Development in line with all applicable legislation and guidance.

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			the scoping of the Environmental Impact Assessment (EIA).	
2	Appendix 2 p.136 Chapter 1	Biodiversity	Desk-top and field surveys of the baseline biodiversity and habitat status have been limited to the (variously defined) sub-parcels of land within the red-lined, overall boundary area. In doing so, 45% of the total area has not been surveyed. Importantly, areas of ancient woodland, some designated SSSIs, either within or immediately adjacent to the overall development area have not been surveyed. These areas rich in biodiversity, including rare and endangered species, have not been adequately assessed. The Applicant's approach to defining habitats on the basis of discrete parcels of land is fundamentally flawed. The surveys planned and undertaken to date are insufficient to inform the EIA on the baseline status and, therefore, the impact of the proposed development.	The Order Limits as now proposed have been surveyed to inform the EIA, including appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies, as reported in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The survey results in combination with relevant data sources used to understand the existing biodiversity baseline conditions are considered a robust data set on which the assessment for biodiversity has been based upon.
3	Appendix 2 p.136 Chapter 1	Landscape and Visual	The proposed location of the solar panels and associated infrastructure would be highly visible to local communities and beyond. For example, some solar panels are to be installed on sloping land, contrary to accepted practice. The area's rich visual landscape, its flora and fauna	Landscape and visual considerations have been one of the critical drivers for design decisions at all stages. The placement and height of infrastructure within Rosefield Solar Farm has been considered carefully to mitigate potential significant effects as far as practicable. The

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			contribute hugely to the amenity value of the area, not only to local communities but also to large numbers of walkers, cyclists and tourists from a wide catchment area. The negative impact of the proposed development on the landscape and its implications for its amenity value cannot be overstated.	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. The potential landscape and visual effects of Rosefield Solar Farm have been considered from the outset of the design process. Early landscape and visual feasibility appraisal fed into the site selection, and options appraisals helped to avoid adverse landscape and visual effects where possible and appropriate. Specific attention has been focussed on mitigating views from local villages and individual residential properties, Calvert Road/Orchard Way and Claydon Road and public rights of way where they pass close to Rosefield Solar Farm. Nevertheless, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be a number of significant adverse landscape and visual effects.

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				It is acknowledged that residual effects cannot always be mitigated and such effects will be weighed in the planning balance.
4	Appendix 2 p.137 Chapter 1	Cultural Heritage	The area is fortunate in having retained many listed buildings and other structures and landforms dating back to the Medieval Period that help define the character of the villages, set in their rural surroundings. The Applicant has ascribed insufficient importance to these in the proposed scope for the EIA.	**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4])** includes assessment of the significance of all designated and non-designated heritage assets within the surrounding area in line with published assessment guidance from Historic England. This includes their contribution to historic landscape and urban character. 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])** has identified those assets whose significance may be affected by the Proposed Development through changes to their setting Further detail is included in Section 9.4 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**
5	Appendix 2 p.137 Chapter 1	Land, Soils and Groundwater	Surveys conducted to date focus on sub-parcels of land. The Applicant is dismissive of the quality of the land and does not appear to have addressed the particular character of the soil type, the nature of existing drainage networks	Whilst the soil type will have a bearing on local drainage characteristics and pathways, the FRA (see **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**) assesses the worst-case scenario with regard to flood risk and

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			and their relation to run-off and watercourses. Parts of the area are subject to flooding, notably close to the proposed location for the scheme's sub-station. The scope of the EIA does not address these issues adequately	demonstrates that there will be no increase in flood risk either on site or off site. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** sets out the agricultural land classification and soil type of the Site and assesses the potential impact of the Proposed Development on the quality of land.
6	Appendix 2 p.137 Chapter 1	Cumulative Effects	Although acknowledged in the report, it is not clear how the Applicant intends to address the cumulative impacts of the proposed development together with those of other local, major infrastructure projects. These include, but are not limited to, HS2, East-West Rail, Grendon Underwood Prison and other local proposed or approved solar energy and battery storage projects. Together they involve huge loss of land, and associated habitats and biodiversity, destruction of the road infrastructure and other assets, major inconvenience to residents and erosion of their mental well-being. These developments continue to disrupt local communities and will do so on a permanent basis. The Applicant has declined to comment on the need for the East Claydon National Grid Substation to be expanded to accommodate the claimed 500 MW output from the solar	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** sets out the methodology for how the Applicant has assessed intra- and inter-cumulative effects. Table 17.3 includes the list of developments that have been assessed in combination with the Proposed Development. This includes those listed here and have been agreed with Buckinghamshire Council. The requirement for National Grid East Claydon Substation to be expanded is decided upon by National Grid. The Applicant is of the understanding that the current National Grid East Claydon Substation is at its end-of-life and will require upgrading to be able to continue operating. Please see National Grid's website for further information: https://www.nationalgrid.com/electricity-transmission/network-and-

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			installation. The land take for any such expansion and its environmental impact must be considered as part of the cumulative effects of the scheme.	infrastructure/infrastructure-projects/east-claydon-substation
7	Appendix 2 p.137 Chapter 1	Population	It is recognised that the scope of the EIA must follow individual, prescribed elements, but the thread that runs through the entire proposed development is its socio-economic impact. This receives little consideration in the Scoping Report but is key to assessing the environmental impact in its fullest sense. Consequences of the proposed development are not limited to the headings above. Eviction of tenant farmers from their farms, many of them from generations of farmers, is not only a huge loss in respect of livelihoods but is a loss to the community in terms of land management, local food production, habitat development and preservation and to the whole local economic structure. Other local businesses are directly dependent on the health and maintenance of local agriculture. Three local businesses alone employ around 100 staff between them. Their dependence on the land and local farming communities means that their viability would be threatened by the proposed development and so those jobs would be at risk. It would be a	A 'Socio-economic Statement' was initially proposed in support of the DCO Application outside of the DCO process, to contain information on the potential loss of permanent jobs, the creation of new temporary and permanent jobs and the effect on the local economy. However, as set out in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4],** the Planning Inspectorate stated that an estimate of the number and types of jobs created should be provided in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. Furthermore, consideration of potential impacts should include the availability of local accommodation and services. These matters were therefore scoped into the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** assessment, and this presents an assessment of likely significant effects arising from the construction, operation

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			relatively simple task to list those jobs that would be lost as a result of this proposed development, and those that would be gained, and to rank these as high-, medium-, and low-skilled. Without this, the report would be incomplete. A full and transparent socio-economic impact assessment is a fundamental requirement towards understanding the true environmental impact of the proposed scheme.	(including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. This chapter therefore considers effects on the interaction between people, community facilities and social infrastructure, commercial land and property.
8	Appendix 2 p.138 Chapter 2	EIA Method and Scope	The Parish of East Claydon includes the villages of Botolph Claydon and East Claydon. The proposed development by Rosefield Energyfarm Ltd, if granted a Development Consent Order, would have far-reaching consequences for our villages and others in the locality, their socio-economic well-being and the surrounding countryside. It is our view that the Applicant's Scoping Report (hereafter 'the report') has major shortcomings and we welcome the opportunity to provide our comments. The report lacks precision in its language (the phrase 'a number of' appears 18 times in the report and 20 times in the Appendices) and all too easily dismisses issues of importance as being unworthy of serious investigation. We have grouped our comments under the main headings adopted in the report and have based them on careful	Further detail about Rosefield Solar Farm can be found in **ES Volume 1, Chapter 3: Description of the Proposed Development [EN010158/APP/6.1]** with further detail of the potential impacts on landscape and visual and population in **ES Volume 2, Chapter 10: Landscape and Visual** and **Chapter 14: Population [EN010158/APP/6.2]**.

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			consideration of its content together with the associated appendices. Our comments are accompanied by responses to the Scoping Questions posed under Section 6 of the report.	
	Appendix 2 p.139 Chapter 3	EIA Method and Scope	Definitions of the Site and Site Boundary are misleading and vary throughout the document. Para 1.1.4 of the report states, "It is important to note that at this stage, Appendix A shows the expected maximum extent of land that would be included within the DCO application, which includes all land being considered for the purposes of the Proposed Development, and provides a 'plan sufficient to identify the land' for the purposes of this EIA Scoping Report." The figure in Appendix A shows the 'red line' boundary for the maximum area of 875.47 ha considered for development. However, subsequent references to 'Site' refer to sub-parcels of land, denoted 1, 1a, 2 & 3 which, the Applicant states, are the principal locations currently under consideration for the solar panel installations and associated infrastructure. Further confusion arises as a result of changes in the areas attributed to those sub-parcels. The claimed maximum permanently affected areas of	The design and Order Limits (previously known as the Site Boundary or Red Line Boundary) have been refined through the EIA and planning process. The Order Limits that the Applicant is requesting consent for are set out in **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. The Site (the land within the Order Limits that the Proposed Development will be built upon) has been split into separate Parcels and Cable Corridors which are defined within **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1]**. **ES Volume 3, Figure: 3.5: Zonal Masterplan [EN010158/APP/6.3]**, and secured within the **Works Plans [EN010158/APP/2.3]**, both illustrate a potential layout of Rosefield Solar Farm, showing the fields in which Rosefield Substation, the BESS, the Collector Compounds and other infrastructure could be located. Each ES Factor has included the guidance followed (see **ES Volume 2, Chapters 6-17**

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			land are stated (Scoping Report 2.3.7) as follows: [see table]. On this basis, 54.9% of the overall site area (875.47 ha) would be occupied by solar panels, collectors, inverters, battery storage units, sub-station and other infrastructure. Note that this is the area the Applicant states will be permanently affected. It is inevitable that large areas of the remaining 45.1% will be affected by installation of cabling, construction work, operation and eventual decommissioning of the site. Section 2.3.1 of the report contains the internally contradictory statement, "The Site measures approximately 875.47 ha (excluding the East Claydon National Grid substation) and extends across four separate parcels of land (Parcels 1, 1a, 2 and 3)". Referring to the overall land take, Section 2.3.3 goes on to say, "This allows for consideration of the potential environmental effects of the full range of options under consideration, to ensure that the likely significant environmental effects of each of the component options has been scoped into the assessment." If surveys are limited to the four sub-parcels of land, this statement cannot be true. The nature of the landforms within the Site is also important. Building Research	**[EN010158/APP/6.2]**) with the **Planning Statement [EN010158/APP/5.7]** providing further detail on how the Applicant has following national guidance and policy, in particular **Appendix 1: Site Selection Report [EN010158/APP/5.7]**.

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			Establishment's Planning Guidance for the Development of Large-Scale Ground Mounted Solar PV Systems states, "Land selected should aim to avoid affecting the visual aspect of landscapes, maintain natural beauty and should be predominantly flat". It is clear that much of the land proposed for installation of solar panels is on sloping land. What is the Applicant's justification for discounting BRE's guidance?	
9	Appendix 2 p.140 Chapter 3.1	EIA Method and Scope	The Applicant has indicated the intention to adopt the 'Rochdale Envelope' to allow for flexibility in defining the scope of the proposed development and, hence, its potential impact on the environment. As noted above, definition of the parcels of land (1. 1a, 2 & 3) has changed during the course of the surveys described in the report and Appendices. It is apparent that work to support the various aspects of the report has been in progress for some 2-3 years. This should have provided the opportunity to solidify the scope of the proposed development. However, during the period of informal consultation with the Applicant, there has been huge uncertainty as to their intentions. This includes, but is not limited to, the question as to whether (as we believe is the case) the National Grid East Claydon Sub-Station will require expansion in	The Site comprises four parcels of land (Parcel 1, 1a, 2 and 3), the Interconnecting Cable Corridor, the Grid Connection Cable Corridor, the National Grid East Claydon Substation, and associated access. These parcels and cable corridors are shown on **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]** and detailed in **ES Volume 1 Chapter 2: Location of the Proposed Development [EN010158/APP/6.1]**. The requirement for National Grid East Claydon Substation to be expanded is decided upon by National Grid. The Applicant is of the understanding that the current National Grid East Claydon Substation is at its end-of-life and will require upgrading to be able to continue operating. Please see National Grid's website for further information:

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			order to accept the claimed 500 MW output of the proposed development. Where would such expansion take place and on what scale? Would it affect the proposed location of the Applicant's planned infrastructure? This information is fundamental to informing the cumulative impact element of the EIA. The Rochdale Envelope concept leaves open the possibility that the Applicant may determine that areas outside Parcels 1, 1a, 2 & 3 are required for installation of further solar panels and associated infrastructure in order to justify the 500 MW connection it claims to have secured from the National Grid. The Applicant has declined to discuss the number of solar panels required to generate the proposed 500 MW output or, indeed, their exact location. Based on our own estimates, approximately 465 ha would be required for the solar panels alone. From the information provided in Section 2.4 of the report at least a further 10 ha would be required for the collectors, inverters, transformers, sub-station and battery storage infrastructure. Together, this would account for the entire area of Parcels 1, 1a, 2 & 3, leaving no space for the 'mitigation and enhancement' claimed for these areas in the Concept Masterplan at Appendix B. Taking an alternative approach, widely published estimates	https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-claydon-substation As the design for the expansion to National Grid's East Claydon Substation is not known, the Applicant has utilised the Rochdale envelope approach by showing whole fields as potential locations for Rosefield Substation and other electrical infrastructure. This will allow flexibility to position the electrical infrastructure to ensure it does not impact upon the expansion of East Claydon Substation. The DCO would only allow development of infrastructure with the Order Limits provided and within the specified areas for each electrical component set out. The Applicant has considered potential cumulative effects of the East Claydon National Grid development and Rosefield Solar Farm along with other existing development(s) and/or approved development(s) within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. Further details of the design parameters of Rosefield Solar Farm are set out in **ES Volume 1,**

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			of the land take for solar energy installations suggest that an area of 5 acres/MW is required. If that is correct, a 500 MW scheme would require 2,000 acres (809 ha) which would leave just 66 ha (7.5%) of the overall site available for habitat mitigation and biodiversity net gain. It is imperative that greater transparency as to the true scope of the proposed development is adopted as part of the EIA. We are aware of three other solar and battery storage installations in the area (either approved or planned), all of which would depend on connections to the East Claydon Sub-Station. Given their close proximity, it is imperative that the Applicant gives careful consideration to the cumulative impact of these developments and includes them in the EIA. Added to this, the area has been subject to huge disruption from major infrastructure projects (notably HS2, East-West Rail [EWR]) over many years. This will continue as construction proceeds and their eventual operation. The far-reaching, negative impacts of these programmes on the environment, local infrastructure and communities cannot be overemphasised and must be considered as part of the Applicant's EIA. Given that the majority of surveys described to date are limited to the sub-parcels of land, and there is no clear definition of 'Site', we have no	**Chapter 3: Description of the Proposed Development [EN010158/APP/6.1]**.

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			confidence in the limited scope proposed for the EIA. We make further reference to the confused definition of Site in subsequent sections.	
10	Appendix 2 p.141 Chapter 3.2	Biodiversity	In Sections 2.3.20-21 of the report, reference is made to the numerous areas of ancient woodland, some designated as SSSIs, that are contained within the overall site boundary or are immediately adjacent to the boundary. The area around Hogshaw Hill Farm to the east of the site has a rich biodiversity which includes the rare marshland beetle, *Limnichus pygmaeus*, found in artesian ponds, a relic of the last Ice Age. The Applicant has failed to acknowledge the importance of these areas and has excluded them from its surveys. In our view, this shows clear lack of understanding and/or negligence. We return to this point under Biodiversity below. The report also fails to acknowledge the well-documented importance of this area for autumn migrant birds. It further fails to acknowledge current efforts and investment to re-introduce birds such as curlew which are now rare or absent, but which have a good and imminent chance of spreading into the site area from sites nearby where they are already established. The	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** fully assess potential impacts to designated sites including ancient woodland and SSSI's. Hogshaw Hill Farm is located outside of the Proposed Development Order Limits and outside of the study area for invertebrates and no potential impact pathways have been identified that could pose a threat to the marshland beetle, *Limnichus pygmaeus* . The survey area for wintering and breeding birds was located within Parcels 1, 1a, 2 and 3 which was deemed sufficient to assess likely direct and indirect impacts to bird species utilising the area. Surveys are not proposed for wintering birds and breeding birds along proposed cable routes as the impacts from this element of works will be minor short-term and temporary and habitats will be re-instated following completion of works. No breeding curlew have been identified, and the Site is located outside of the main river valleys within the wider Bernwood BOA so is considered unlikely to severely restrict any future curlew

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			report compounds this omission by saying that snipe do not occur at the site; this is untrue.	reintroduction programme. Snipe has been identified during winter bird surveys but only very small numbers as part of a larger influx of European snipe which is relatively widespread in the UK countryside during the winter months.
11	Appendix 2 p.141 Chapter 3.3	Climate	During informal consultation events held on behalf of the Applicant, representatives were unable to provide information or evidence on any alternatives considered, be they alternative sites for solar energy or alternative forms of renewable energy generation. Section 3.1.2 of the report states. "The ES will include a description of the reasonable alternatives that have been considered, including a clear narrative on the main reasons for selecting the chosen option, including a comparison of the environmental effects. The reasonable alternatives assessment will focus on; the site selection process, design layouts/opportunities within the Site, the sizing and scale of infrastructure, and alternative technologies. As part its narrative on this point, we would expect the Applicant to provide a detailed analysis of the net greenhouse gas emissions (GHG) associated with the complete life-cycle of the production, installation, operation and decommissioning of the solar energy installation	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** includes a GHG assessment that appropriately calculates the net GHG impact of the Proposed Development in line with IEMA's (2022) Guide to Assessing Greenhous Gas Emissions and Evaluating their Significance. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** presents the alternatives sites (Section 4.4) and alternatives renewable technologies (Section 4.5) considered.

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			in its entirety set against the negative impact associated with loss of carbon capture etc. (See also under 6.3.14 Scoping questions below).	
12	Appendix 2 p.141 Chapter 3.4	Consultation	The Applicant states under Section 4.2.1 that "Consultation alongside the EIA process is critical to the development of a comprehensive and proportionate ES." Our experience through the informal consultation period was wholly unsatisfactory. There was great reluctance to provide adequate detail of the proposed development area which made it difficult for residents and parish councils to express a meaningful view on the matter. The Applicant's lack of knowledge and understanding of the area and its communities was deeply concerning, as was the failure to commit to transparency in the consultation process. It is to be hoped that, in any future consultation, the Applicant will be both better-informed and transparent in their dealings with communities that are understandably alarmed by the proposed development. It is noted that Section 4.2.6 does not include parish councils in the list of consultees. We trust that this is not an intentional omission.	Consultation was undertaken at three stages of the DCO Application development. Phase One Consultation was the period of non-statutory consultation on the Applicant's early plans which took place between 28 September and 10 November 2023. Phase Two Consultation was the period of statutory consultation on the Applicant's updated plans and proposals which took place between 18 September and 5 December 2024. Targeted Consultation was the period of targeted statutory consultation on the revised layout of the BESS and Rosefield Substation which took place between 14 May and 9 July 2025. Further information on the consultation can be found in the **Consultation Report [EN010158/APP/5.1]**.
13	Appendix 2 p.142	EIA Method and Scope	Under Section 4.3, the Applicant outlines difficulties and uncertainties. We agree that there	Surveys have been undertaken across the whole of the Site. These have been reported on in the

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	Chapter 3.5		are significant risks associated with reliance on third party data and this is commented upon in 6.2.14 Scoping questions below. As has been alluded to already, we have grave concerns regarding the inadequacy of the study areas described under the various headings in Section 6 of the report. These are discussed in more detail under the relevant sub-sections. Reliance on desk-top analyses is no substitute for on-site surveys and seeking out local knowledge. We are aware of all too many inappropriate conclusions drawn from such analyses in relation to planning applications. Definition of baseline conditions must also be cognisant of other developments, planned or in progress, in the locality.	**ES Volume 4 Appendices [EN010158/APP/6.4]** and used to inform the ES Assessments (detailed in **ES Volume 2, Chapters 6-17 [EN010158/APP/6.2]**) which also assesses the potential cumulative effect of other developments, planned or in progress, in the locality. The Applicant has sought out local knowledge through engagement and consultation with local residents and stakeholders. Further details on this can be found in the **Consultation Report [EN010158/APP/5.1]**.
	Appendix 2 p.142 Chapter 3.6	Mitigation	For reasons discussed under our comments under Section 6, we regard it as disingenuous to imply that the impacts of a development on this scale can be mitigated or the landscape 'enhanced' (Section 4.10).	Potential impacts of the Proposed Development can be reduced in magnitude which in turn lowers the significance of effects. Mitigation measures are intended to limit the development's impact on sensitive receptors, ensuring it is less intrusive than it would be without such measures. Enhancement, on the other hand, does not necessarily reduce the impacts of the Proposed Development, but is design to deliver improvements to the locality in some form.

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				Mitigation and enhancements associated with each environmental factor are set out in the corresponding ES chapters (**ES Volume 2, Chapters 6-17 [EN010158/APP/6.2]**).
14	Appendix 2 p.143 Chapter 4	Glint and Glare	We note that, under Section 5.2, it is proposed that 'Glint and Glare' should be considered in a document separate from the EIA. We disagree with this approach. The Applicant seems to be focussed principally on any potential impact on aviation and rail services, with little consideration for residents, tourists and livestock. The proposed solar arrays would be mounted on steeply sloping as well as more level terrain. As such there is considerable potential for them to be viewed at changing angles over large areas. In addition to the potential for glint and glare to be disturbing to the human population, it is well known that horses are easily spooked by sudden changes in circumstances. The potential threat to the large numbers of horses in the area must be considered. As such, it is our view that glint and glare should be covered in the EIA.	A full glint and glare technical assessment is provided in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** including a detailed description of the assessment methodology. This takes into account all slopes in the terrain. The list of receptors includes aviation, railway, roads, buildings, PRoWs, bridleways and padding fields at Hogshaw Farm.
15	Appendix 2 p.143 Chapter 4.1	Water - Flooding	In Table 5-1 of the report, it is stated that the Site is not considered to be at risk of river flooding or surface water flooding. This is contradicted in Section 5.9.3 where it is acknowledged that	These points are addressed in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** and in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, which clearly

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			areas of Flood Zones 2 and 3 encroach onto the site (notably the proposed location for the scheme's sub-station). We are aware of sections of the overall site that are prone to flooding. The prevailing soil type is clay, and the area has a network of established agricultural land drains. In Section 2.4.63 of the report, the Applicant offers two options for drainage on the proposed development. The second option (i.e. "if during the construction any of the infrastructure interrupts the existing section of land drainage, then new sections of drainage would be constructed." fails to understand the nature of the existing network of mole drains that have to be redrawn every 5-7 years. Without these, the risk of increased run-off from the site (and, hence, flooding) would be greatly increased but, once the solar panels and other infrastructure have been installed, redrawing them would not be possible. Following the installation of solar panels, rainfall will effectively be localised to the small area below the lower panel edges which will greatly impact the impermeable nature of the site. This localisation of precipitation will overwhelm the soil's already low ability to soak it up, leading to potential run off. It will be noted also from Plate 5.2 in the report that the ancient woodlands within and adjacent to the site are	define and distinguish the various areas at risk of flooding, together with proposed mitigation measures. An **Outline Drainage Strategy [EN010158/APP/7.11]** which demonstrate that surface water runoff from the Proposed Development can be managed effectively.

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			amongst the most vulnerable areas to flooding at times of extreme rainfall. Disturbance of the established drainage system, removal of topsoil, compaction of ground during construction, the linear run-off from solar panels, excavation of cable trenches and the large areas of impermeable surfaces associated with the large infrastructure will all combine to alter the hydrology of the area. This is tacitly acknowledged in Section 5.9.27 and must be considered in the Applicant's submissions.	
16	Appendix 2 p.143 Chapter 4.2	Human Health	It is widely recognised that there has been a major negative impact of the major infrastructure projects, HS2 and EWR on local communities in general and individuals in particular. The high level of stress associated with these undertakings has taken its toll which, for some individuals, has been catastrophic. The potential for the proposed solar energy station to add to this self-evident. We cover this point under 6.914 Scoping questions below, but our position is very clear; it is imperative that a full and transparent socio-economic analysis of the impact during all phases of the project must be included as an integral, indeed, central part of the EIA.	**ES Volume 2, Chapter 14; Population [EN010158/APP/6.2]** presents an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. This chapter therefore considers effects on the interaction between people, community facilities and social infrastructure, commercial land and property. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the development of the Project. It sets out where individual topic assessments have considered health effects and

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				reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This highlights the elements of the Proposed Development that could have the potential to increase stress levels of individuals and the local community. On balance, it is reported that the Proposed Development would not result in any significant residual effects on human health, though it is noted that in some cases there are significant residual topic-specific environmental effects that may influence determinants of health (landscape and visual effects).
17	Appendix 2 p.144 Chapter 4.3	Material Assets and Waste	Under Section 5.8.6, the Applicant states, "However, where possible, soil arisings will be balanced through a cut and fill exercise to retain volumes on Site." This raises concerns as to the Applicant's intentions in terms of land profiles, additional HGV traffic and the potential for reinstatement of the land at the end of the operational period and so the topic should be covered within the EIA and ES. This is considered further under 6.5.14 Scoping questions below	The potential impacts on soil degradation are outlined in in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation included in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. The cut and fill balance is set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and **Outline Site Waste Management Plan [EN010158/APP/7.2]**. The detailed cut and fill balance for the Site will be developed during detailed design; however, any

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				soil arisings from the relevelling works will be repurposed on the Site. It is not intended that significant quantities of excavated arisings from the Site during construction (there are currently no demolition works proposed, for example), operation (including maintenance) or decommissioning will be removed. There may, however, be a need to remove some soils from the Site for treatment or disposal, if found to be contaminated, as it is not practical to treat this on Site. However, this is unlikely to be required (refer to **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**). **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** sets out the assessment on traffic during construction however, it is not anticipated that any additional HGV traffic will result from soil arisings. Details of soil reinstatement methodologies and how topsoil temporarily moved during construction will be stored on site are presented in the **Outline Soil Management Plan [EN010158/APP/7.7]**. No topsoil will be removed from site.
18	Appendix 2 p.144	Water	Sections 5.9.18-30 are full of contradictions regarding the discharge of wastewater into the	These matters are assessed in full in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** and

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	Chapter 4.4		public foul water sewers which renders the Applicant's intentions unclear. In view of that uncertainty, the scale of the project and the sensitivity of watercourses and local habitats, we submit that water quality, water pollution and increased foul water flows into the public sewer network should be included in the EIA.	**ES Volume 1, Chapter 3: Description of the Proposed Development [EN010158/APP/6.1].** Waste/foul water discharge during the Construction and Decommissioning phases of the Proposed Development 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. Waste/Foul water discharge during the pre-commencement and Operational (including maintenance) phases of the Proposed Development would have significantly lower volumes than those collected during the Construction and Decommissioning phases due to the amount of workers on-site. During these phases of the Proposed Development, the waste/foul water discharge could be achieved through the same options as discussed in the above paragraph but also through a potential third option. This third option would be a package treatment works that would located within the

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				vicinity of the Rosefield Substation, BESS and Main Collector Compound. Due to the nature of the Site, the foul flows in these phases of the Proposed Development are likely to be small and, as such, a package treatment works may be a viable approach with ultimate discharge towards a drainage field or the local ditch/watercourse network (if required via a field drain).
19	Appendix 2 p.145 Chapter 5.1	Air Quality	A desk-top study (Section 6.1.3) is unlikely to be sufficient to inform the EIA. Pollutants from the Greatmoor incinerator plant are carried on the prevailing wind towards the proposed site as are those associated with the HS2 and EWR projects, as noted at 6.1.5 of the report.	As part of the EIA Scoping Opinion **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]**, Buckinghamshire Council has confirmed that a desk-top study and the data sources listed to inform the Air Quality assessment are appropriate and, therefore, no additional air quality baseline survey was required in order to establish existing baseline air quality for the EIA. Refer to **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**.
20	Appendix 2 p.145 Chapter 5.2	Biodiversity	The extent of the negative impacts of the proposed development cannot be over-estimated. We find the studies conducted to date and the proposals for the EIA to be woefully inadequate	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the Proposed Development based on full baseline surveys with

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			for the purpose of accurately and transparently assessing those impacts.	appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects, detailed within and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]**, **Outline LEMP [EN010158/APP/7.6]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**.
21	Appendix 2 p.145 Chapter 5.2	Biodiversity	*Appendix F-1 PEA September 2021 Preliminary Ecological Appraisal Report May (PEA) 2022* As noted under Section 3. Definition of Site above, the total area of the site is given as 875.47 ha (2,163 acres) –However, the claimed maximum permanently affected areas are stated (Scoping Report 2.3.7) as: • Parcel 1 – 183 ha • Parcel 1a – 15 ha • Parcel 2 – 228 ha • Parcel 3 – 55 ha • Total 481 ha = 54.9% of overall site area The ecological assessment is focussed on the four parcels designated 1, 1a, 2 & 3. These roughly correspond to the currently proposed locations for the solar panels and the associated infrastructure (although we have serious doubts	A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**) which covers the entirety of the Order Limits. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the Proposed Development based on robust baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with

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			as to whether this represents the true extent of the land take – see under 3.1 Uncertainty through adoption of the Rochdale Envelope above). No assessment appears to have been undertaken on the areas scheduled for the cable runs, intra-site haulage routes or the adjoining land areas, including important ancient woodlands, some of which are designated SSSIs, and other key habitat areas. The proposed Site falls within the Claydon Estate which has managed the land, directly or through tenant farmers and other arrangements through many generations. The Estate's website includes the following statements: Biodiversity Being part of the government's Countryside Stewardship scheme, means that we are committed to managing a landscape that is rich in wildlife. Approximately 10% of our land is now wildflower-rich, through the planting of wildflower seeds, wild bird seed and pollen and nectar mixes, creating flourishing wildflower corridors that are a valuable food source for both pollinating insects and wild birds. Woodland Management Claydon Estate's 600 acres of woodland is an	relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** identifies the location of and recognises the importance of all woodland blocks including those designated as SSSI's and provides a full assessment of potential impacts and appropriate mitigation for all phases of the Proposed Development. The ES chapter also provides a full assessment of land and species associated with cable routes and access routes potential impacts and appropriate mitigation for all phases of the Proposed Development. The embedded mitigation measures include for the retention of all statutory and locally designated wildlife sites and ancient woodland with a minimum 30m offset from the fence line. Consultees and developments that are already underway and that are proposed in the local area have been contacted for information relating to ecological assessments that have been undertaken and ecological records data for the local area, along with publicly available information. The results of the data and assessments have been used to inform the

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			important habitat for flora and fauna. We have an ongoing responsibility to maintain and protect all areas of the woodland, in particular the sites of specific scientific interest (SSSI), which provide a home to an extensive variety of wildlife and rare species. These statements do not appear to be reflected in the Applicant's assessment of the site. Woodland around the proposed site has indeed many rare and unreplaceable species of flora and fauna. The animals and plant life found around these ancient woodlands have a symbiotic relationship with each other and rely on both woodland and the open arable land adjoining the woodland to sustain their own particular species requirements. The scrapes and ponds introduced by generations of farmers form part of the landscape and provide habitats which appear to go unnoticed in the ecological assessment. National and local policy requires that developments must not adversely affect wildlife corridors. By restricting ecological surveys to limited parcels of land and ignoring adjoining rich habitat areas, a full understanding of existing wildlife corridors across the 875.47 ha site	assessment of cumulative effects in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. The Proposed Development is designed with an appropriate buffer from panels to flower-rich areas, wildlife corridors and woodlands in keeping with the Estate's commitment to enhancing and protecting biodiversity. These protection measures are included within the **Outline CEMP [EN010158/APP/7.2]**. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**) considers how Biodiversity Net Gain is achieved including significant habitat-based enhancements. **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]** however, 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.

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			cannot be realised. It follows, therefore, that the impact of the proposed development will not be fully understood. As noted under 2.2 (Vale of Aylesbury Local Plan), Policy NE5 states: "*Considering development involving potentially adverse lighting impacts to wildlife, the council will expect surveys to identify wildlife corridors and ensure that these corridors are protected and enhanced where possible*." The Applicant's approach to the PEA would not allow them to comply with that policy requirement. Of course, interruption of wildlife corridors is not limited to the impacts of lighting. The physical barriers introduced by the proposed development (e.g. between areas of ancient woodland) have the potential to disrupt those corridors. The Applicant's approach to the ecological appraisal fails to capture the potential for such impacts. The PEA cannot, therefore, provide a true picture of the entire 875.47 ha site and, consequently, the impact of the solar energy installation during construction, operation and decommissioning. It is fundamentally flawed. The report is dated May 2022 and so does not necessarily represent the current status. Of particular note is the area adjacent to HS2 and	

ID	Ref	Description	Consultee's comment	Applicant's response
			EWR workings which will continue to impact on the local environment over coming years, both during extensive construction works (including the proposed HS2 maintenance depot) and eventual operation of rail services. The 'baseline' thus remains unstable and various species are likely to be displaced to surrounding areas. There is the further issue of the proposed 25 MW solar development at Tuckey Farm (63 ha; Planning Application 19/00983/APP; approved), Statera proposed 500 MW battery storage installation (25.9 ha; Scoping Opinion Request 23/01438/SO) and proposed Wings Farm 49.9 MW solar installation (70.7 ha; Scoping Opinion Request 23/01939/SO). Eauch of these adjoins land proposed for development by Rosefield Solar and so surveying discrete parcels within the 875.47 ha site is wholly inadequate. Under Section 2.2 (Vale of Aylesbury Local Plan), the Applicant cites Policy NE8 which states: "Development that would lead to an individual or cumulative significant adverse impact on ancient woodland or ancient trees will be refused unless exceptional circumstances can be demonstrated that the impacts to the site are clearly outweighed by the benefits of the development." Failure to survey the areas of	

ID	Ref	Description	Consultee's comment	Applicant's response
			ancient woodland encompassed within or adjoining the proposed development site risks unknown or unintended adverse effects were the development to proceed.	
22	Appendix 2 p.147 Chapter 5.2	Utilities	National Grid Sub-Station It is our understanding that the existing East Claydon National Grid Sub-Station does not have the capacity to accept the proposed 500 MW input from the Rosefield scheme and so would require expansion to enable the required connections. (The same applies to the proposed Statera battery storage installation [23/01438/SO]). Clearly, any expansion of the sub-station would have a very significant impact on land use, ecology, transport, overall timeframe of construction and the local population. However, our enquiries during informal consultation seeking clarification from Rosefield Solar on the requirement for any expansion were met with the response that it is an issue for the National Grid. It is self-evident that plans for expansion of the National Grid Sub-Station must form an integral part of the Scoping Report and, hence, EIA.	The requirement for National Grid East Claydon Substation to be expanded is decided upon by National Grid. The Applicant is of the understanding that the current National Grid East Claydon Substation is at its end-of-life and will require upgrading to be able to continue operating. Please see National Grid's website for further information: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-claydon-substation The Applicant has undertaken a cumulative effects assessment to assess any potential cumulative effect with the proposed expansion of the East Claydon National Grid Substation (see **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**).

ID	Ref	Description	Consultee's comment	Applicant's response
23	Appendix 2 p.147 Chapter 5.2	Biodiversity	Range of species studied. It is noted that, for the most part, the survey does not include mammalian species other than bats, badgers and otters. There is brief mention in the PEA of dormice and water voles but these are largely dismissed on the basis of perceived lack of habitats, presumably assessed only within the limited sub-parcel study areas. Given that mammalian species form an important part of the overall interdependencies of the local ecology, we are concerned that the resultant surveys do not provide a true picture of the range of species and habitats across the 875.47 ha site. Failure to survey adjoining areas of woodland further amplifies the resulting deficiencies. We submit that dependence on HS2 surveys to inform the situation on the present site is ill-advised.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The assessment does not depend upon HS2 surveys, which were used as valuable context at EIA scoping stage. Water vole surveys were undertaken of watercourses within and adjacent to the Order Limits, habitats were considered sub-optimal to support water vole and no evidence of water vole was identified. In addition, the Proposed Development includes an appropriate standoff from watercourse features detailed within and secured by the **Design Commitments [EN010158/APP/5.9], 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]**.such that any impacts on watercourses and water voles are unlikely to occur if they were present.

ID	Ref	Description	Consultee's comment	Applicant's response
				All woodland areas are retained as part of the Proposed Development. Dormice are considered likely absent however habitat suitable to support this species including woodland adjacent to the Proposed Development boundary and hedgerows within the Proposed Development boundary are present. The Proposed Development incorporates a buffer from panels to boundary features including hedgerows and woodland. Measures outlined in 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]** will safeguard hedgerow and woodland. Minor hedgerow loss to accommodate cabling routes and haul routes has been assessed within the ES and appropriate mitigation included in the **Outline LEMP [EN010158/APP/7.5]** and through a detailed biodiversity design considered in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**.
24	Appendix 2 p.147 Chapter 5.2	EIA Method and Scope	The Applicant is right to highlight the limitations inherent in desk and field study surveys and is correct in stating that "a lack of records for a particular habitat or species does not necessarily mean that the habitats or species do not occur in	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed

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			the study area." Indeed, this is apparent from the results of the studies embodied in the report. It is clear from local knowledge that some species are grossly underrepresented, and others completely missed from the survey data. Table 5,1 lists some of the species are known to inhabit land within or adjoining the overall (875.47 ha) site but, either have not been identified or reported, or are underrepresented in the various surveys.	development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects.
25	Appendix 2 p.147 Chapter 5.2	EIA Method and Scope	The whole thrust of the ecological assessment by the Applicant to date appears to be predicated on the assumption that habitats and associated wildlife can be defined as arbitrarily defined, discrete areas that are the principal focus for development. The natural flora and fauna do not respect such constraints and we submit that the Applicant's approach is fundamentally flawed and therefore misleading in its conclusions. In the absence of a clear understanding of the woodland habitats within and adjacent to the proposed development site, we have grave concerns that the impact of the proposed 25 metre buffer zones and boundary fencing will not be fully assessed or appreciated by the Applicant. It is our view that is that the	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors including Bechstein's bats and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. Where photographs and target notes have been redacted from reports this relates to confidential or sensitive information and has been redacted in line with standard practice to redact any information pertaining to the presence and

ID	Ref	Description	Consultee's comment	Applicant's response
			proposed development is highly likely to negatively impact important species having principal habitats in the woodlands but are dependent on territories outside them. Of particular note in this respect are the various populations of bats, including red-listed Bechstein's bat, known to be present in the woodland areas encompassed within or adjacent to the site. These are dependent on foraging areas across the entire 875.47 ha site. Presence of Bechstein bats was a key determinant in shaping the HS2 project in the locality. The Applicant should demonstrate close and detailed consideration to the populations resident in woodlands that would be affected by its proposed development. Appendix A: Legislation and Policy The Applicant draws attention to Paragraph 182 of the NPPF which states that "The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site". We submit that, given the limitations of the data	location of species where there is a risk of persecution. Note that the unredacted versions are submitted to the Planning Inspectorate in confidence.to ensure the protection of these species.

ID	Ref	Description	Consultee's comment	Applicant's response
			obtained from desk and field surveys to date, the Applicant is not in a position to conclude that the project will not adversely affect the integrity of the habitats within the proposed development site and adjoining areas, including ancient woodland. Appendix B: Figures It will be noted that the areas defined for Sub-Parcel 2 in Figures 1-3 differ from those in other studies. We are concerned that a number of photographs and target notes relating to Fig. 4.1-4.2 have been redacted from the report. We have not found an explanation or justification for doing so.	
26	Appendix 2 p.147 Chapter 5.2	Biodiversity	3.3 Desk Study and Field Survey Limitations The Applicant is right to highlight the limitations inherent in desk and field study surveys and is correct in stating that "a lack of records for a particular habitat or species does not necessarily mean that the habitats or species do not occur in the study area." Indeed, this is apparent from the results of the studies embodied in the report. It is clear from local knowledge that some species are grossly underrepresented, and others completely missed from the survey data.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects.

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			Table 5,1 lists some of the species are known to inhabit land within or adjoining the overall (875.47 ha) site but, either have not been identified or reported, or are underrepresented in the various surveys.	
27	Appendix 2 p.148 Chapter 5.2	Biodiversity	5.2 Constraints and Requirements for Further Survey The whole thrust of the ecological assessment by the Applicant to date appears to be predicated on the assumption that habitats and associated wildlife can be defined as arbitrarily defined, discrete areas that are the principal focus for development. The natural flora and fauna do not respect such constraints and we submit that the Applicant's approach is fundamentally flawed and therefore misleading in its conclusions. In the absence of a clear understanding of the woodland habitats within and adjacent to the proposed development site, we have grave concerns that the impact of the proposed 25 metre buffer zones and boundary fencing will not be fully assessed or appreciated by the Applicant. It is our view that is that the proposed development is highly likely to negatively impact important species having principal habitats in the	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. The Applicant understands and is aware of the presence of bats.. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes an assessment on how the land affected by the Proposed Development is currently being used by bats for foraging and commuting in order to inform the assessment. Due to the bat assemblage present within the Order Limits, and the relative importance of habitats both within the Order Limits and within the wider landscape, bat species

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			woodlands but are dependent on territories outside them. Of particular note in this respect are the various populations of bats, including red-listed Bechstein's bat, known to be present in the woodland areas encompassed within or adjacent to the site. These are dependent on foraging areas across the entire 875.47 ha site. Presence of Bechstein bats was a key determinant in shaping the HS2 project in the locality. The Applicant should demonstrate close and detailed consideration to the populations resident in woodlands that would be affected by its proposed development.	have been split into three receptors (Bechstein's bat (foraging, commuting and roosting), Barbastelle bat (foraging commuting and roosting) and other bat species (foraging commuting and roosting) (common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, Leisler's bat, serotine, brown long-eared bat, Daubenton's bat and other Myotis species)) in order to permit the nuanced assessment of impacts as a result of the Proposed Development. This has informed the comprehensive assessment of all stages of the Proposed Development presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and an assessment of intra an inter project effects of the Proposed Development on Bechstein's bats detailed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which has been prepared in collaboration with a leading UK bat specialist. Natural England has been consulted to discuss the potential impacts to foraging, commuting and roosting bat species which informed the identification of appropriate mitigation measures. The assessment of impacts to ecological receptors has informed the location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any

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				adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape. The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date. The Proposed Development has been designed to ensure the retention and protection of all designated sites and ancient woodland, other woodland area, ancient and veteran trees, 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 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. The locations of

ID	Ref	Description	Consultee's comment	Applicant's response
				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 will create a coherent ecological network that will link 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 will 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 will improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds will help to enhance the pond network in the area, provide additional bat foraging habitat and support GCN. In addition, these habitats will also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. Buffer zones and boundary fencing fall within the Order Limits of the Proposed Development and have therefore been fully assessed within **ES**

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				Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].
28	Appendix 2 p.148 Chapter 5.2	Biodiversity	Appendix A: Legislation and Policy The Applicant draws attention to Paragraph 182 of the NPPF which states that "The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site". We submit that, given the limitations of the data obtained from desk and field surveys to date, the Applicant is not in a position to conclude that the project will not adversely affect the integrity of the habitats within the proposed development site and adjoining areas, including ancient woodland.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. The assessment presented within the **HRA No Significant Effects Report [EN010158/APP/5.3]** identified no likely significant effect to international and European sites when the Proposed Development is considered alone and in-combination. As such, an Appropriate Assessment is not considered necessary.
29	Appendix 2 p.149 Chapter 5.2	Biodiversity	Appendix B: Figures It will be noted that the areas defined for Sub-Parcel 2 in Figures 1-3 differ from those in other studies. We are concerned that a number of photographs and target notes relating to Fig. 4.1-4.2 have	This information was redacted in line with standard practice to redact any information pertaining to the presence and location of badgers due to the risk of persecution. Note that the unredacted versions are submitted to the Planning Inspectorate in confidence.

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			been redacted from the report. We have not found an explanation or justification for doing so.	
30	Appendix 2 p.149 Chapter 5.2	Biodiversity	*APPENDIX F-2 WINTERING BIRD SURVEYS OCTOBER 2021 – MARCH 2022* *3.2* 3.2 Field survey The survey area is defined as that "included all habitat within the Site and a 50 m survey buffer." There being no further definition of the site, we assume that this means the four parcels 1, 1a 2 & 3, referred to previously for other field studies. By way of example, we are aware of large flocks of fieldfares and redwings that are observed each year across the entire 875.47 ha development site. We submit that the inadequacies of the surveys to date cited under 3.4 Assumptions; Field Survey are understated. The additional surveys proposed under 6. Conclusions for Parcel 2 are unlikely to provide a true picture.	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Wintering bird surveys have been completed to inform the assessment of impacts on avian species. These are reported in full in **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report 2022 [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report 2024 [EN010158/APP/6.4]**. We recognise that bird surveys represent a snapshot in time, and not all species will necessarily be recorded as birds are highly mobile especially during the winter months, therefore the large flocks of fieldfare and redwing referenced may not have been present at the time of survey. However, the level of survey effort (covering each of Parcels 1, 1a, 2 and 3 plus 50m buffer) completed is sufficiently robust to assess potential impacts on the wintering bird and breeding assemblages and determine the mitigation to be included within the Proposed Development design to offset potential significant adverse impacts.

ID	Ref	Description	Consultee's comment	Applicant's response
31	Appendix 2 p.149 Chapter 5.2	Biodiversity	*APPENDIX F-3 BREEDING BIRD SURVEYS MARCH 2022 – JUNE 2022* *1.3* 1.3 Site Description The report again confuses the definition of 'Site' which, we conclude, is not the overall development site but is limited to the four parcels of land designated 1, 1a, 2 & 3. 3.4.2.	Breeding bird surveys have been completed to inform the assessment of impacts on avian species. These are reported in full in **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]**. Survey areas for wintering bird surveys covered Parcels 1, 1a, 2 and 3 plus 50m buffer as detailed in the survey methodology and are sufficiently robust to understand the value of both the wintering and breeding bird assemblage that is present.
32	Appendix 2 p.149 Chapter 5.2	Biodiversity	3.4.2 Field survey Given the comment under 1.3 above we cannot agree with the report's statement that, "It is considered that sufficient representatives of all habitat types and species were covered within the entirety of the survey period, to allow for a comprehensive assessment of bird species and assemblages present within the Scheme boundary". It is inconceivable that "all species" could have been covered during the survey period of August and September which is not relevant for, as an example, autumn migrant birds. Table 4-1 summarises breeding status, number of territories and conservation status of	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Bird surveys represent a snapshot in time, and not all species will necessarily be recorded as birds are highly mobile especially during the winter months. However, the level of survey effort (covering each of Parcels 1, 1a, 2 and 3 plus 50m buffer) completed is sufficiently robust to assess potential impacts on the wintering bird and breeding assemblages and determine the mitigation to be included within the Proposed Development design to offset potential significant adverse impacts.

ID	Ref	Description	Consultee's comment	Applicant's response
			birds recorded within the survey area for each scheme area. Local knowledge and experience inform us that the numbers and range of species reported here are underrepresented (see also Table 5.1 above). Amongst those not reported are examples of rare and endangered species. For example, the conclusion that the presence of barn owls is only 'possible' is an extraordinary statement given the frequent sightings and known nesting sites in the area. This further highlights the deficiencies in the scope of the studies and failure to assess the overall proposed development site.	Surveys recorded Barn Owl calling along the eastern edge of Site 1, although breeding was not confirmed and no breeding sites were recorded within the Order Limits despite the presence of barn owl boxes being recorded within the Order Limits and other suitable breeding habitat also being identified. However, the habitat on site, which includes grassland margins and mature trees (some with cavities), is likely to support this species and therefore this calling bird was included as a possible territory.
33	Appendix 2 p.149 Chapter 5.2	Biodiversity	*APPENDIX A: FIGURES* The 'Distribution of territories for species of conservation concern' for the four parcels of land surveyed, as illustrated in Figs 2a-r, is further evidence of the inadequacy of the focussed areas investigated. It is clear that there will be overlap of habitats between areas not investigated, both within and outside the proposed overall development site.	The survey locations are focused on areas where permanent development is proposed plus a 50m buffer. Given that the cable works will be a short-term temporary impact, surveys have been decided upon to be proportionate to this impact given that the assessment for breeding and wintering birds has determined that there will either be no significant impact given proposed mitigation to negate impacts.
34	Appendix 2 p.150	Biodiversity	*APPENDIX B – NOTEWORTHY SPECIES RECORDS* It is not clear how negative records of presence	This comment included under comments made referring to APPENDIX F-3 BREEDING BIRD SURVEYS MARCH 2022 – JUNE 2022, assume

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	Chapter 5.2		of a species in this table relate to statements earlier in the report (e.g. confirmed presence of common toad, cinnabar moth, common frog, meadow pipit, woodpigeon, yellow wagtail, etc.).	this is an error and is actually in reference to APPENDIX F-5 PEA JUNE, JULY, AUGUST AND OCTOBER 2023. A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). Data was obtained from Buckinghamshire and Milton Keynes Environmental Records Centre for protected and noteworthy species located within the Proposed Development boundary and up to 2km from the boundary. Where records of note were identified, these have been included in the assessment.
35	Appendix 2 p.150 Chapter 5.2	Biodiversity	*APPENDIX C* Several photos/target notes have been redacted. No reason has been given.	This comment included under comments made referring to APPENDIX F-3 BREEDING BIRD SURVEYS MARCH 2022 – JUNE 2022, assume this is an error and is actually in reference to APPENDIX F-5 PEA JUNE, JULY, AUGUST AND OCTOBER 2023. It is normal practice to redact any information pertaining to the presence and location of badgers due to the risk of persecution in line with standard

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				practice. Note that the unredacted versions are submitted to the Planning Inspectorate in confidence.to ensure the protection of these species.
36	Appendix 2 p.150 Chapter 5.2	Biodiversity	*APPENDIX D – TARGET NOTES* Some of the photographs and notes have been redacted. The Applicant should state the reasons for doing so.	This comment included under comments made referring to APPENDIX F-3 BREEDING BIRD SURVEYS MARCH 2022 – JUNE 2022, assume this is an error and is actually in reference to APPENDIX F-5 PEA JUNE, JULY, AUGUST AND OCTOBER 2023. It is normal practice to redact any information pertaining to the presence and location of badgers due to the risk of persecution in line with standard practice. Note that the unredacted versions are submitted to the Planning Inspectorate in confidence.to ensure the protection of these species.
37	Appendix 2 p.150 Chapter 5.2	Biodiversity	*APPENDIX E PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT* Chapter 13 (Population) should include a detailed analysis of the local socio-economic impact of the proposed scheme. Without this, the true environmental impact cannot be assessed. (See comments under 6.9.14 Scoping questions below).	This comment included under comments made referring to APPENDIX F-3 BREEDING BIRD SURVEYS MARCH 2022 – JUNE 2022, assume this is an error. This assessment is provided in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2].**

ID	Ref	Description	Consultee's comment	Applicant's response
38	Appendix 2 p.150 Chapter 5.2	Biodiversity	*APPENDIX F-4 Great Crested Newt eDNA Survey May 2022 and April 2022* Section 1.1.3: Whilst the scope of this study covers a broader area than the other ecological surveys, the following statement is noted; "The scope of field surveys was restricted to water bodies within ownership of the Claydon Estate (the landowner). No access to any land outside of the ownership of the Claydon Estate was provided." It should be added to that some of the potential GCN habitat locations within the proposed overall development site (875.47 ha) have been excluded from the analysis on the basis that they are >250 metres from the site. Presumably this means >250 m from one of the sub-parcels of land, NOT the site overall. In any event, the entire study should be discounted because the boundaries for the individual study sites as defined in Fig 1 do not correspond to those in the Site Masterplan (the latter being significantly larger areas than those given in Fig 1).	GCN surveys have been sufficient to inform the status and extent of GCN in the local area (see **ES Volume 4, Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report 2023 [EN010158/APP/6.2]**) such that it was identified as an ecological receptor and included in the assessment, presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The Applicant has been in consultation with both NatureSpace and Natural England regarding GCN licence options. Works with the potential to affect GCN would be carried out either under the Buckinghamshire District Level Licensing Scheme through NatureSpace Partnership or under a European Protected Species licence from Natural England. The licensable works would encompass clearance, and construction works required within the intermediate and distant habitat zones of ponds (likely up to 250m) within the Order Limits.
39	Appendix 2 p.150 Chapter 5.2	Biodiversity	*APPENDIX F-5 PEA JUNE, JULY, AUGUST AND OCTOBER 2023* Section 1.1.1: As in other parts of the Ecology sections, 'Site' is referred to in the singular,	A Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES**

ID	Ref	Description	Consultee's comment	Applicant's response
			giving the impression that it refers to the entire 875.47 ha area and yet it is clear from Fig.1 of the PEA that it refers only to the four sub-parcels of land within that area. It is disingenuous to suggest that the report provides a comprehensive review of the status quo and the areas that could be affected by the development.	**Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**) which covers the entirety of the Order Limits. . All relevant areas have been surveyed for all applicable species, including appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies.
40	Appendix 2 p.150 Chapter 5.2	Biodiversity	Badgers: 3.3.27 This section has been redacted without explanation.	It is normal practice to redact any information pertaining to the presence and location of badgers due to the risk of persecution in line with standard practice. Note that the unredacted versions are submitted to the Planning Inspectorate in confidence.to ensure the protection of these species.
41	Appendix 2 p.150 Chapter 5.2	Biodiversity	Habitats and plants: 4.4.2-3 It is noted that the 'Site' is "considered to be of national importance for bat and invertebrate assemblages, and at least of county value for other fauna species." Furthermore "Loss of these habitats would also result in a loss of suitable resting, foraging and breeding habitats and ultimately potential loss of these species. These habitats should be a focus for protection and enhancement for ecological purposes." Contrary	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes

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			to this statement, the areas selected for study exclude a number of those that are quite clearly important habitats for these species.	mitigation, where appropriate, to address likely significant effects. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** provides within the assessment all proposed habitat losses, retention, creation and enhancements and identifies how a minimum 10% net gain in biodiversity will be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric. The biodiversity design of the Proposed Development is cognisant of local biodiversity priorities already identified for the areas and in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, and Buckinghamshire Council. These measures focus 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.
42	Appendix 2 p.151 Chapter 5.2	Biodiversity	Birds: 4.8.2 For reasons discussed above, the true extent of species diversity amongst breeding birds across the proposed development site overall has been underestimated.	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Breeding and wintering bird surveys have been completed to inform the assessment of impacts on avian species. These are reported in full in **ES Volume 4, Appendix 7.3: Wintering Bird**

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				Survey Report 2022 [EN010158/APP/6.4], ES Volume 4, Appendix 7.11: Wintering Bird Survey Report 2024 [EN010158/APP/6.4], 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]**. We recognise that bird surveys represent a snapshot in time, and not all species will necessarily be recorded as birds are highly mobile especially during the winter months. However, the level of survey effort completed is sufficiently robust to assess potential impacts on the avian assemblages and determine the mitigation to be included within the Proposed Development design to offset potential significant adverse impacts.
43	Appendix 2 p.151 Chapter 5.2	Biodiversity	4.14. Validity of Data We contest the validity of the data, both in terms of the limited areas surveyed and the absence of reports of species known to be present both within and adjacent to the proposed development site.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely

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				significant effects. This is detailed in and 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]**..
44	Appendix 2 p.151 Chapter 5.2	Biodiversity	Further Surveys Required – Great Crested Newts: 5.2.3 Given the scale of the proposed development, we suggest that a District Level GCN Licence should be strongly resisted. If the rationale for doing so is that mitigation for GCNs could be achieved through transfer of existing populations to sites further afield, it should be understood that it would have a significant impact on populations across the local area and should be avoided.	District Licensing is a recognised approach endorsed by Government to address the impacts of projects on GCN. The Applicant has been in consultation with both NatureSpace and Natural England regarding GCN licence options. Works with the potential to affect GCN would be carried out either under the Buckinghamshire District Level Licensing Scheme through NatureSpace Partnership or under a European Protected Species licence from Natural England. The licensable works would encompass clearance, and construction works required within the intermediate and distant habitat zones of ponds (likely up to 250m) within the Order Limits.
45	Appendix 2 p.151 Chapter 5.2	Biodiversity	Breeding Birds 5.2.6 Barn owls, little owls and tawny owls are known to inhabit the area and so proper surveys must be undertaken.	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2], 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]**.

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				Surveys recorded Barn Owl calling along the eastern edge of Site 1, although breeding was not confirmed. However, the habitat on site, which includes grassland margins and mature trees (some with cavities), is likely to support this species and therefore this calling bird was included as a possible territory. Little owl and tawny owl are relatively widespread species. The bird survey undertaken is only a snapshot in time and is unlikely to record every species. What is required is a robust data set that enables a valid assessment of the value of the avian assemblage as a whole to support the identification of sufficient mitigation; which the Applicant has achieved.
46	Appendix 2 p.151 Chapter 5.2	Biodiversity	Opportunities for Enhancement: 5.4.3 Given the extent and variety of species identified within the limited areas of study, it is likely that similar and, indeed, other species and habitats will be present in the 45.1% of the overall development site not studied, as well as the adjoining significant areas of ancient woodland. It is difficult to see how the 'lost habitat' could be replicated on the remainder of the site.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects.

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				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]** however, 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.
47	Appendix 2 p.151 Chapter 5.2	Biodiversity	Hedgerow Regulation Survey Results: Fig 4 (1-10) In these figures, hedgerows are designated as Important (Yes or No). However, on p82 of the document there is a footnote stating "N.B A hedgerow may also be classified as 'important' due to the presence/recorded presence of a particular animal and plant species (see Criteria 6 subparagraphs (1)-(4) of the Regulations for details). This has not been considered in our assessment as we do not currently have data of this type that could contribute to the assessment." On this basis, it is assumed that additional surveys are required in order to confirm the assigned Yes/No designations. In any event, this is needed to inform the assessment of the flora associated with hedgerows.	Hedgerow surveys have been undertaken as part of the Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). This assessed their value using the ecological criteria for 'Important Hedgerows'. Hedgerows will be mostly retained in their entirety with a minimum 10m offset from the fence line to existing hedgerows. However, limited removals are required to facilitate Grid Connection Cable Corridor, Interconnecting Cable Corridors and Internal Access Corridors. Cable installation and highways access proposals for visibility splays. An assessment of the likely effects on hedgerows was scoped into the assessment to determine if they support species

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				listed in Criteria 6 subparagraphs (1)-(4) of the Regulations. Assessment of impacts to species that could be supported by hedgerows is fully detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. Details of lengths of hedgerow removal proposed is shown in the **Outline LEMP, Appendix 3: Vegetation Removal Parameters [EN010158/APP/7.6]**. New hedgerow planting will be implemented across the Site. Measures to minimise the impact of construction activities are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]** and **Outline LEMP [EN010158/APP/7.6]**. 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 will 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]**).

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				The DCO secures the removal of hedgerows to be removed, including removal of important hedgerows as set out in the DCO schedules.
48	Appendix 2 p.151 Chapter 5.2	Biodiversity	*APPENDIX F-6 OTTER AND WATER VOLE SURVEYS JUNE 2023 AND AUGUST 2023* It is noted that evidence of the presence of otters was found in watercourses WC41, 43, 44 & 48. Figs 3 & 4 give the erroneous impression that the various branches of the watercourse that include WC40-53 terminate at the arbitrary 200 m boundary, whereas they form just part of a more extensive system of watercourses. Thus, given that evidence of the presence of otters was obtained within the search area, it seems likely that there is potential for a wider presence along that system complex. WC48 defines the south-eastern boundary of sub-parcel 3 and so the presence of otters here has an important bearing on the assessment of environmental impact of the proposed development. The statement in Appendix F-7 (Section 2.3.2) that "Surveyors also found the watercourse in Site 3 was largely inaccessible due to dense woodland scrub on the right bank and a steep, densely vegetated left bank. Inaccessible banks combined with a narrow channel (c.1 m width)	Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 4, Appendix 7.8: Otter and Water Vole Survey Report 2023 [EN010158/APP/6.4]**. Suitable habitat within the Proposed Development boundary and up to 200m from the site boundary were subject to survey where access was available, in line with survey guidance. The Applicant understands that watercourses do not terminate at the 200m boundary. The **Appendix 7.8: Otter and Water Vole Survey Report 2023 [EN010158/APP/6.4]** identifies that watercourses ecologically connected to the site were surveyed and no evidence of otter was recorded along these watercourses, and they offer limited foraging habitat for otter. However, as they join a large watercourse which provides suitable food sources with evidence of crayfish recorded, and the terrestrial habitat is suitable for otter to disperse across land. The assessment incorporates mitigation to prevent disturbance to otters and their resting places.

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			rendered this site unsuitable for survey," places additional caveats on the overall conclusions for this location. Under Section 2.2 (Vale of Aylesbury Local Plan), the Applicant cites Policy NE2 states: "Development proposals must not have an adverse impact on the functions and setting of any watercourse and its associated corridor." It is not clear how the Applicant proposes to comply with this policy requirement.	**ES Volume 4, Appendix 7.9: Preliminary Aquatic Survey Report 2023 [EN010158/APP/6.4]** and **ES Volume 4, Appendix 7.8: Otter and Water Vole Survey Report 2023 [EN010158/APP/6.4]** highlight that several sections of the watercourse adjacent to Parcel 3 were inaccessible due to dense vegetation and steep-sided banks (over 2 m and greater than 45 degrees in places).
49	Appendix 2 p.152 Chapter 5.3	Cultural Heritage	*APPENDIX G CULTURAL HERITAGE STAGE 1 ASSESSMENT AND FIGURES* Houses and Cottages (Section 1.2.2): The Applicant states that for "The majority of listed houses and cottages are small dwellings within settlements. … all derive significance and their principal reason for designated from the architectural and historic interest inherent in their fabric as examples of vernacular architecture. The wider rural surroundings of these buildings makes a minor contribution to their significance and in most cases the site visit undertaken on 10/10/2023 has indicated that the setting of the buildings will not be altered by the presence of the proposed development due to the distance from the Site, topography and intervening	The Stage 1 Setting Assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) has considered all listed buildings within 5km of the Order Limits including how their rural setting contributes to their significance. The assets scoped into **ES Volume 2 Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Buckinghamshire Council and Historic England.

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			vegetation or buildings". We don't agree that all of the relevant buildings have been considered in this analysis. Furthermore, as presented, the scope fails to understand that the development of these buildings and their settings over centuries was integral to their rural communities and so cannot be set aside from their surrounding environment.	
50	Appendix 2 p.152 Chapter 5.4	Land, Soils and Groundwater, and Water	*APPENDIX H LAND AND SOIL FIGURES* We are greatly concerned by the approach of limiting surveys to the sub-parcels of land. Failure to undertake studies across the entirety of the overall site risks unanticipated damage to the soil structure, hydrology and water quality.	Surveys have been undertaken across the entirety of the Site where access has been granted. The results of these have been documented in **ES Volume 4, Appendices [EN010158/APP/6.4]**. There is still a section of the Interconnecting Cable Corridor that requires an ALC survey to understand the soil quality. Based on all available sources of data, the ES assessment has assumed that the land is of 3b quality in agreement with Natural England (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**), with surveys aiming to be undertaken post-submission of the DCO Application. Consideration is given to the quality of groundwater within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**, where an assessment of the importance of

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				groundwater receptors is provided (as defined in Table 11.6) and potential effects relating to the groundwater receptors in terms of quality are assessed (see Sections 11.8.4, 11.8.8 and 11.8.12 for construction, operation (including maintenance) and decommissioning phases, respectively). Consideration is given to the quality of surface water within **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** where an assessment of the potential impacts has been provided.
51	Appendix 2 p.152 Chapter 5.5	Landscape and Visual	*APPENDIX I LANDSCAPE FIGURES* The Zones of Theoretical Visibility (ZTV) shown for solar panels, collector compounds, battery storage areas and sub-station in Figs 1-5b contradict statements in Appendix G (1.1.2) regarding intervisibility. It is extraordinary to suggest that certain heritage assets do not derive their heritage significance from their setting. The ZTVs serve to confirm the devastating extent of the potential impact of the proposed development on the whole of the Claydon Valley and beyond.	ZTV Figures presented in **ES Volume 3 [EN010158/APP/6.3]** demonstrate the maximum extents of visibility which is likely to be greater than that experienced 'on the ground'. In addition the ZTVs do not show the impact of proposed mitigation screen planting. The contribution of setting to the significance of heritage assets within the study area is considered within the Stage 1 Setting Assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). The assets scoped in for more detailed assessment (where the contribution of setting may be affected by the Proposed Development) have been agreed

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				with Buckinghamshire Council's Built Heritage Advisor and Historic England.
52	Appendix 2 p.152 Chapter 5.5	Landscape and Visual	Buckinghamshire Council has a policy to promote tourism across the county. The Claydon Valley is a very popular area for walkers and cyclists. Section 6.6.5 of the report acknowledges the various Aylesbury Vale Landscape Character Assessments relevant to the proposed development site and to the PRoWs that cross the site. It correctly identifies that "Recreational users of PRoWs would likely be some of the most sensitive visual receptors of any change in the landscape." What it fails to acknowledge is the impact of the installation of vast areas of solar panels behind high security fences, topped with CCTV cameras, on the visual amenity of the PRoWs. By way of example, the route, much loved by walkers, rising along Splash Lane towards Runts Wood with skylarks singing above would be reduced to an industrial site devoid of the rich birdlife that inhabits the area. The table at Section 6.6.8 of the report includes a series of important statements. The impact of the proposed development on areas classified under eleven Landscape Character Assessments (LCAs) and one Area of Attractive Landscape (AAL) is	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that there would be permanent significant effects on LCA 5.7, LCA 7.3 and LCA 9.1; PRoW between Botolph Claydon and Runt's Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runt's Wood); PRoW between East Claydon Road and Parcel 3; Swan's Way/Outer Aylesbury Ring, Claydon House and Hogshaw Farm and Wildlife Park. 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 secured by the **oLEMP [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), notwithstanding the fact that there would be some screening and softening of views,

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			described as "there is likely to be a direct [or indirect], large scale change to characteristics of the landscape within part of that area." Against that background, it is difficult to see how that Applicant's statement at 6.6.10 "A comprehensive landscape mitigation strategy for the entire site will be developed and will seek to deliver significant landscape as well as biodiversity enhancement" can have any credibility.	the significant effects for these receptors would remain. It is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance.
53	Appendix 2 p.153 Chapter 5.5	Landscape and Visual	Fig 6 identifies two sites as Tourist Receptors, Hogshaw Farm & Wildlife Park and Claydon House. The former attracts large numbers of visitors throughout the year. Under Section 6.6.8 of the report it is stated, that the local area LCA 5.7 Hogshaw Claylands (in which Hogshaw Farm & Wildlife Park is situated) "there is likely to be a direct, large scale of change to characteristics of the landscape within part of this LCA" but there appears to be no consideration of the impact on the centre's future prospects.	**ES Volume 2, Chapter 10: Landscape and Visual [EN10158/APP/6.2]** considers the landscape and visual effects during construction and operation of receptors including recreational attractions Hogshaw Farm and Wildlife Park and Claydon House. **ES Volume 2, Chapter 14: Population [EN10158/APP/6.2]** draws on this assessment and others across the ES to consider the potential for environmental effects on the tourist draw of the area as well as the viability of individual businesses. It is acknowledged that in terms of visual amenity, effects are reported as **moderate adverse (significant)** during construction and operation at Hogshaw Farm and Wildlife Park.

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				It is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance and in the context of whether a single, localised significant visual impact would affect the overall viability of the business. 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]**.
54	Appendix 2 p.15 Chapter 5.5	Landscape and Visual	Claydon House attracts tourists from a wide catchment area, but local walkers and cyclists provide a large proportion of the visiting population. Section 6.6.8 of the report notes that there may be views of the solar installation from Claydon House. Land identified by the Applicant is part of the Claydon Estate. It is a paradox that the proposed development would have a major impact on the visual amenity of the area and therefore remove its attractiveness from a tourism perspective. The Applicant is correct in noting at 6.6.12 that other major infrastructure projects are underway	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** has assessed that there would be no significant adverse effect on the visual amenity of road users approaching Claydon House. However, users of the PRoW within the grounds of Claydon House RPG would experience significant effects. 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]**.

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			or planned in the same locality and that these must be considered in assessing the impact of the proposed scheme.	It is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance.
55	Appendix 2 p.153 Chapter 5.6	EIA Method and Scope	The definitions of Site and Site Boundary are misleading. These terms are used variously throughout the document to describe the site overall (e.g. Appendix A - 875.47 ha) or sub-parcels (designated 1, 1a, 2 & 3 in Appendix B), the latter relating to areas of land that, in themselves, are not consistently defined between the various sections of the document. The Glossary in Appendix J offers yet another definition of 'Site'.	The Site Boundary refers to the Red Line Boundary (now the Order Limits in the DCO Application). The Site is the land within the Order Limits (or Red Line Boundary) on which the Proposed Development would be carried out.
56	Appendix 2 p.154 Chapter 6	Air Quality	6.1.14 Scoping questions (Air quality) Do you agree with the proposed list of consultees? As noted by the Applicant, Buckinghamshire Council has very few, if any, air quality monitoring stations in the area. The NO2 monitoring point in Winslow is not relevant to local conditions. The Applicant should thus commission independent measurement of key determinants of air quality. Do you agree with the proposed study areas? The definition of Site is not clear and is not used consistently in the scoping documents. For the	Buckinghamshire Council confirmed in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** that the data sources listed to inform the Air Quality assessment are appropriate and therefore no additional air quality baseline survey was required to independently measure key determinants of air quality. The assessment presented in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** considers the effects of the Proposed Development on the whole proposed site area with the study area defined in line with IAQM

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			purposes of this section, is 'Site' limited to sub-parcels 1, 1a, 2 & 3? The area is subject to frequent periods of high wind speeds. This should be considered in relation to distribution of dust from any site workings. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? As noted above, there are likely to be few data sources available relevant to the local area. Are any receptors/assets/resources not identified that you would like to see included in the EIA? The cumulative impact of activities based on HS2 and EWR sites and other planned developments in the area on air quality should be included in any analysis. A company, based in Botolph Claydon, operates under stringent air quality controls. Any increase in dust or other atmospheric pollutants would seriously compromise its operations. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? The Applicant asserts that "it is considered unlikely that a significant number of vehicle movements associated with staff commuting to and from the Site will be generated	guidance. Dust and particulate matter emissions resulting from the Proposed Development activities, including earthworks, construction and trackout and the operation of the construction equipment, as well as haulage/construction vehicles and vehicles used for workers' trips to and from the Site were scoped into the assessment. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** considers the cumulative effects of the Proposed Development with others, including HS2 and EWR sites where applicable. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** includes a GHG assessment that appropriately calculates the net GHG impact of the Proposed Development in line with IEMA's (2022) Guide to Assessing Greenhous Gas Emissions and Evaluating their Significance.

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			to result in a significant effect on local air quality. This will be assessed against the EPUK screening criteria within the ES." It is important that the impact on air quality of on-site vehicle movements and other machinery as well as road traffic is included in the analysis. Do you agree with the proposed factor-specific assessment approach? Of fundamental importance to the argument advanced in support of the proposed development is an independent assessment of the net GHG emissions associated with the project overall (see under 6.3.14 below). Whilst the need to move towards genuinely renewable energy sources is recognised, this should not be undertaken without transparent analyses of those net emissions and consideration of alternatives.	
57	Appendix 2 p.154 Chapter 6	Biodiversity	*6.2.14 Scoping questions (Biodiversity)* Do you agree with the proposed list of consultees? Local specialist groups (e.g. North Bucks Bat Group) should be consulted also.	Consultation has been undertaken with a range of interested parties as described in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2].**
58	Appendix 2 p.154	Biodiversity	Do you agree with the proposed study areas? No. The focus on sub-parcels of land (the definition of which varies between the various surveys) is wholly inadequate. This approach is	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of

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	Chapter 6		fundamentally flawed on three main accounts: 1. Areas within the overall site (875.47 ha), but outside the four sub-parcels, will be used for cable runs, site roadways and possible other uses not specified (e.g. site offices, storage of equipment, materials shifted from other locations on the site, etc,). Clearly, unless the area ecological status of these excluded areas (45.1% of the total) and adjacent woodlands is fully understood, the impact of activities on those areas is unknown and unaccounted for. In any event, the Applicant's adoption of the Rochdale Principle means that future iterations of the plans could involve areas of the overall Site not currently included in the sub-parcels and, hence, not surveyed. 2. Wildlife does not operate in discrete parcels of land. The ecology of the areas not surveyed is interdependent with the areas surveyed and so activity in one parcel of land will affect adjacent areas, and vice versa. By the same token, failure to survey the areas of ancient woodland encompassed by, or adjacent to, the proposed development site (each having its own rich biodiversity, including rare and protected species) is either naïve or negligent. 3. During the period of non-statutory consultation, the Applicant's representatives	the biodiversity effects of the Proposed Development including all proposed works to be undertaken within the Order Limits, and is based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. The design of the Proposed Development has been informed by the ongoing environmental assessments and comments raised by consultees during consultation and engagement to date. The Proposed Development has been designed to ensure the retention and protection of all designated sites and ancient woodland, other woodland area, ancient and veteran trees, 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 limited value to biodiversity in comparison to retained habitats of higher value, with infrastructure located to avoid more ecologically sensitive areas.

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			indicated that areas within the main development site, but outside the sub-parcels identified for the solar panels and other infrastructure, would be reserved for biodiversity gain. No further information was provided. If this were the intended use of those areas, then it is imperative that full ecological surveys are needed. Without them, there is no basis for determining, for example, whether habitats, soil types, etc. lend themselves to provision for displaced species. Do those sites have examples of competing flora and fauna, either of the same or different species?	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. 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 will create a coherent ecological network that will link the Site to the wider landscape, reducing fragmentation across the wider landscape and supporting the movement of local wildlife, particularly bats. A detailed biodiversity design has been developed which identifies how a minimum 10% net gain in biodiversity will be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory Biodiversity metric (see **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). **ES Volume 4, Appendix 7.17 - Biodiversity Net Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals

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				secured in the **Outline LEMP [EN010158/APP/7.6]** however, 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 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.
59	Appendix 2 p.154 Chapter 6	Biodiversity	Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Reliance on data from HS2 is a risky approach. Such information may date from the period leading up to approval of the project and so fails to account for any subsequent displacement of species and habitats. Conversely, assumptions as to the existence of habitats for endangered species may no longer apply such that examples	As described in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** the assessment draws on a wide range of surveys undertaken for Proposed Development in combination with data sources and does not exclusively rely on data from the HS2 project. In addition to the results of bat surveys undertaken for the Proposed Development, the Natural England's (2024) 'The Bernwood Population of Bechstein's Bats' was also used to aid the assessment.

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			of those habitats, within or adjacent to the proposed Site, assume even greater importance.	
60	Appendix 2 p.154 Chapter 6	Biodiversity	Are any receptors/assets/resources not identified that you would like to see included in the EIA? Local knowledge is key to a full understanding of the site overall. It is unacceptable to exclude areas of ancient woodland within and adjacent to the site from the EIA.	Local knowledge has been incorporated into the assessment presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** through consultation**,** with details of consultation presented within **Table 7.1** of the chapter and also within the **Consultation Report Appendices [EN010158/APP/5.2],** **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the of the proposed development on ancient woodland located within and adjacent to the Order Limits. The ES proposes mitigation, where appropriate, to address likely significant effects to ensure the integrity and functionality of the ancient woodland sites is fully protected.
61	Appendix 2 p.154 Chapter 6	Biodiversity	Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? It is not accepted that mitigation of the adverse impacts of the proposed scheme is achievable. We are sceptical as to the feasibility of the proposal (6.2.10) "Creation of herbal 'ley' habitat	Although there is shading underneath panels, vegetation does grow and the extent of available light depends on the height of the panels, the type of panels and other factors. The assessment takes account of shading being sub-optimal for vegetation growth, and there is a large area between and around the array where vegetation

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			or similar underneath solar panels to restore soil health and create a nectar source for invertebrates - in particular pollinators." Given that the function of solar panels is to absorb radiation it is not clear how herbal-rich leys can be established underneath the panels when the area will be largely starved of meaningful sunlight. In our view, any such ley would have to be installed at least two years before siting the panels to stand any chance of success and great care would be needed at the construction stage to avoid its destruction.	growth will be more optimal. Details of habitat creation proposals underneath Solar PV modules along with management and monitoring is detailed within the **Outline LEMP [EN010158/APP/7.6]**. Refer to **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**.
62	Appendix 2 p.154 Chapter 6	Biodiversity	Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? Failure to identify certain species is used as justification for removing them from the scope. However, as is acknowledged in the report itself, failure to identify a given species through a desk search or formal survey does not preclude the presence of that species. Indeed, on the basis of local knowledge, assertions of absence in the report are clearly incorrect. Under Section 6.2.9, the Applicant is dismissive of areas of cereal crops as foraging sites for bats, remarking, "However, the value of this foraging habitat is likely to be low given the intensity of the	The approach to scoping is in compliance with the Planning Inspectorate's Scoping Opinion, where all matters required to be scoped in have been scoped in (including the Local Wildlife Sites that are located adjacent to the Order Limits) and assessed. Matters scoped out of the assessment are generally those that will be avoided and are not expected to be affected by the Proposed Development. Detailed justification for scoping out of receptors has been provided in the ES. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of

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			management and likely application of insecticides and herbicides." For the avoidance of doubt, it is important to note that most cereal crops do not receive any insecticides except for an application in late autumn to control aphids and the viruses they spread. Insect life during the spring and summer months is therefore largely unaffected and these crops are therefore potentially a rich source of foraging for bats and insect eating birds. Furthermore, regular rotation of crops contributes to biodiversity. The statement at 6.2.9 that, "Survey has indicated that there are no notable non-crop plants within the Site Boundary. Therefore, no significant effects and these have been scoped out of further assessment." is not accepted and is at variance with the Claydon Estate's own position on the matter. Furthermore, the Applicant accepts that in the assessment of hedgerow quality, there has been no attempt to undertake detailed surveys (see under Hedgerow Regulation Survey Results below). We consider the exclusion of areas of ancient woodland from the scope to be irresponsible. Definition of the Site on the basis of sub-parcels within the overall site boundary cannot lead to an understanding of the interdependencies of the ecology of the area.	the biodiversity effects of the proposed development based on full baseline surveys with appropriate buffer zones tailored to individual ecological receptors and in consultation with relevant consultation bodies. The ES proposes mitigation, where appropriate, to address likely significant effects. The assessment acknowledges the importance of foraging and commuting bats and the role of cereal crops as sub-optimal foraging habitat for bats (in comparison to other highly suitable foraging and commuting habitat identified within and adjacent to the Proposed Development boundary such as hedgerows, field margins, and woodland blocks). Targeted surveys for arable (non-crop) plants undertaken within Parcels 1, 1a, 2 and 3 did not identify any protected or notable arable (non-crop) plant species, therefore these species are considered absent from the Site, and no impacts will occur (see **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). Hedgerow surveys have been undertaken as part of the Preliminary Ecological Appraisal was initially undertaken in 2022 (**ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal 2022 [EN010158/APP/6.4]**) and

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				updated in 2025 (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]**). This assessed their value using the ecological criteria for 'Important Hedgerows'. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the of the proposed development on ancient woodland located within and adjacent to the Order Limits. The ES proposes mitigation, where appropriate, to address likely significant effects to ensure the integrity and functionality of the ancient woodland sites is fully protected. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2**] and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the biodiversity effects of the Proposed Development including all proposed works to be undertaken within the Order Limits, not just the sub-parcels.
63	Appendix 2 p.154	Biodiversity	Do you agree with the proposed factor-specific assessment approach It is inevitable that failure to take a holistic view	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**

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	Chapter 6		of the existing ecology will result in failure to understand the true impact of the proposed development.	identify and assess effects upon all relevant designated sites, habitats and species , including intra and inter project effects, and provides a robust assessment completed in line with scoping opinion (**ES Volume 4, Appendix 5.1: EIA Scoping Opinion [EN010158/APP/6.4]**), and undertaken in line with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024).
64	Appendix 2 p.156 Chapter 6	Climate	6.3.14 Scoping questions (Climate) Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? It is not sufficient under 6.3.7 for the Applicant to state, "Given the assumed operational lifespan of 40 years for the purposes of the EIA, the cumulative effect of these GHG reductions will likely [our emphasis] provide significantly beneficial effects on the stability of the climate." This superficial statement is not adequate justification for the destruction of 875.47 ha of farmland, green and blue space, livelihoods and socio-economic structure of local communities. Justification of the proposal must be evidence	**ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** includes a GHG assessment that appropriately calculates the net GHG impact of the Proposed Development in line with IEMA's (2022) Guide to Assessing Greenhous Gas Emissions and Evaluating their Significance. All relevant and material emissions sources have been accounted for and any exclusions clearly noted and justified. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] paragraph 8.8.1** lists and summarises the reporting modules used for the assessment, sourced from the Royal Institute of Chartered Surveyors (2023) guidance.

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			based. We would expect to see a complete and detailed analysis of the following: Emissions associated with: • Production of materials and components and final products over the entire life-cycle in the construction of solar panels, collectors, inverters, battery storage units, sub-station and connector cabling. • Importation of the above. • Transport to site. • Site preparation. • Installation of the various units, construction of infrastructure and connections to the National Grid. • Operation of the site once commissioned, including power losses. • Reduction in carbon capture resulting from the loss of crops, etc. • Increase in GHG consequent on loss of food production and need to source food from further afield. • Replacement of solar panels and batteries during the proposed operational life-time. • Dismantling of site and associated infrastructure. • Reinstatement of agricultural land • Recycling of all materials. Net change in GHG emissions should be set	

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			against realistic estimates of power generation over the lifetime of the installation. We agree that, ultimately, the receptor is the global atmosphere. However, construction, operation, renewal of components and decommissioning will contribute substantially to local emissions. This should be the subject of a separate calculation. Justification for a project on this scale also needs to consider other forms of renewable energy, including small scale nuclear reactors.	
65	Appendix 2 p.157 Chapter 6	Cultural Heritage	6.4.14 Scoping questions (Cultural heritage) Do you agree with the proposed list of consultees? Local communities should be consulted to determine what is important to them. Do you agree with the proposed study areas? The ZTVs for the various elements of the site are of fundamental importance. We do not agree that the rural setting of listed properties is not relevant. The impact on all Listed properties in the villages should be evaluated. Do you agree that the data sources listed to inform the EIA baseline characterisation are	Local communities have been involved in the consultation process as a whole which has included information on heritage at Phase One (non-statutory consultation), Phase Two (statutory consultation) and Targeted Consultation that has taken place. All designated heritage assets (including listed buildings) within 5km have been included within the **Stage 1 Setting Assessment (Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). The heritage assets within and around the study area are shown overlain on the ZTV in **Figures 9.2 and 9.3** within **ES Volume**

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			appropriate? Local historical expertise should be consulted also. Are any receptors/assets/resources not identified that you would like to see included in the EIA? There are examples of ridge and furrow fields within the overall site area (see under 6.5.214 below and in LCA 5.6 Claydon Valley). These should be included to protect them in compliance with Buckinghamshire Council's policies as expressed in LCA 5.6, "Encourage the preservation of historic earthworks and ridge and furrow by maintaining a continuous grass sward." Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? Mitigation of the impact of a scheme on this scale is not feasible. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? See above. Do you agree with the proposed factor-specific assessment approach? As indicated, focus on a few, selected Listed buildings is not appropriate. Heritage sites are not simply isolated assets, and they include other features, such as ridge and furrow fields. Each contributes to the overall setting and character of the individual villages	**3 [EN010158/APP/6.3]**. 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])** has identified those assets whose significance may be affected by the Proposed Development. This includes an assessment of the contribution to their significance made by setting. The heritage assets scoped into **ES Volume 2 Chapter 9 Cultural Heritage [EN010158/APP/6.2]** have been agreed with Buckinghamshire Council and Historic England. Effects to ridge and furrow earthworks have been considered both as individual groups of open fields (each associated with separate settlements) and as part of the surviving post-medieval field system and have been assessed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**. Mitigation measures to reduce the impact of the Proposed Development have included changes to the layout to avoid or minimize effects resulting from changes to the setting of heritage assets and a proposed programme of archaeological evaluation and mitigation detailed in the **Draft Archaeological Management Strategy**

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			and parishes of which they are a part. As well as considering individual sites, the overall impact on the villages and parishes must be considered.	**[EN010158/APP/7.10]** which would be secured by a DCO Requirement and would avoid, reduce or offset potential impacts on archaeological remains. These mitigation measures are set out within Table 9.8 and Table 9.12 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** and are considered to be appropriate and anticipated to be effective. The detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010158/APP/6.4])** has considered the setting and character of the villages (including East Claydon) as well as of individual assets. The relationship between the assets, individually and as groups, and their setting has also been considered within the assessment.
66	Appendix 2 p.158 Chapter 6	Land, Soils and Groundwater	6.5.14 Scoping questions (Land, soils and groundwater) Do you agree with the proposed list of consultees? The principal consultees have been identified. Do you agree with the proposed study areas? No. Agricultural Land Classification has been assessed only in sub-parcels 1, 1a, 2 & 3. It is not clear, but it would appear that other	Assessment of BMV, soils and groundwater is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation included in the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3], Outline DEMP [EN010158/APP/7.4]** and **Outline SMP [EN010158/APP/7.7**]. The Agricultural Land Classification (ALC) survey was completed in all agricultural Solar PV

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			assessments under this heading have been limited to these areas also. If that is the case, it is difficult to understand how a true picture of the site overall can be established. (See, e.g. also under 6.2.14 Biodiversity above). Do you agree with the proposed surveys? The Applicant should include consultation of records of ridge and furrow fields to identity sensitive sites (see Fig. 6.1). It is the policy of Buckinghamshire Council to protect ridge and furrow fields as part of the heritage of the area. The proposed development would have a significant impact on that heritage. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Yes. Are any receptors or resources not identified that you would like to see included in the EIA? Watercourses extend beyond the study area. It is not clear how impact on flows, especially during flood-risk periods will be affected by the proposed development. Artesian ponds feature in the area. It is important that these are identified from a hydrology perspective but also their particular ecological characteristics which may include rare species. Scrapes and ponds	development areas. There is still a section of the Interconnecting Cable Corridor that requires an ALC survey to understand the soil quality. Based on all available sources of data, the ES assessment has assumed that the land is of 3b quality in agreement with Natural England (see **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]**), with surveys aiming to be undertaken post-submission of the DCO Application. ALC survey information is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]**. Consideration of ridge and furrow fields has been included within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** Details of soil reinstatement methodologies and how topsoil temporarily moved during construction will be stored on site are presented in the **Outline Soil Management Plan [EN010158/APP/7.7]**. No topsoil will be removed from site. Flood risk, surface water drainage and impacts on watercourses are addressed in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2], ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]**.

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			created by farmers over generations should also be mapped and surveyed. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? The Applicant states, "No significant effects to soil are anticipated." Given the predominantly clay character of the soil, the damaging nature of compaction through the use of heavy machinery/road vehicles on-site needs careful consideration. It is not clear to what extent topsoil will be removed from the site and its ultimate fate. How would the area be reinstated after the proposed 40-year lifecycle? Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? Assurances on the unlikelihood that impacts on groundwater would occur are not accepted. The area is known to flood and so any changes in the fate of surface water have significant potential to exacerbate the problem. What is the impact of cable trenches on the hydrology of the area?	
67	Appendix 2 p.159	Landscape and Visual	6.6.14 Scoping questions (Landscape and visuals)	Local communities have been involved in the ongoing consultation process which has included in-person public consultation events and on-line

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			Do you agree with the proposed list of consultees? The most important consultees are local residents and visitors to the area. Do you agree with the proposed study area? The ZTV areas provide an important aspect of this analysis. However, the scope for assessing impact on individual properties is too limited and should include views from upper as well as ground floor aspects. It is our understanding the number of residents contacted to determine the potential impact from their homes is very limited. How does the Applicant plan to assess visual impact from those areas identified in the ZTV analyses? Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? See above. Are there any specific viewpoints to consider? • The Mushroom Shelter, East Claydon • East/Botolph Claydon Village Hall • Hogshaw Road • Church Lane, Granborough • Denham View, Granborough • Sovereign Road, Granborough Are any receptors/assets/resources not identified that you would like to see included in the EIA?	opportunity to respond to proposals. Local communities have been involved in the consultation process as a whole which has included information on heritage at Phase One (non-statutory consultation), Phase Two (statutory consultation) and Targeted Consultation that has taken place (see the **Consultation Report [EN010158/APP/5.1]**). The study area extents have been selected to encompass the area that the proposed development may influence in a significant manner. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** takes into account the information from the ZTVs, GIS mapping, discussions with consultees and extensive site visits to determine receptors to be scoped in or out of the study. With regard to specific properties, the study has taken a precautionary approach, taking into account buffers from the various built structures to determine which properties should be included in the RVAA presented in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]**. All residents of properties included in the RVAA were offered a home visit in order to undertake a detailed assessment from

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			See above. Impact of glint and glare from solar panels on the visual landscape needs to be assessed from a human, livestock and wildlife perspective and from multiple viewpoints. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? Mitigation for destruction of the local landscape and environment on this scale is not possible. We refer to the statement under 6.6.11, "However, there are situations where the effect on the outlook/visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before." This, of course, applies not only to residential properties but to other assets, such as Public Rights of Way (PRoWs). Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? The impact on isolated dwellings within or adjacent to the overall site cannot be overemphasised. Are there any specific developments to be considered for the cumulative assessment? The impact of other proposed solar/battery storage	their dwelling and its curtilage. The RVAA takes into account both upper and lower storey views of the Proposed Development. The proposed additional viewpoints have been considered as follows: • Mushroom Shelter in Viewpoint 40; • East/Botolph Claydon Village Hall in Viewpoint 13; • Hogshaw Road in Viewpoints 18, 20 and 27; • Church Lane, Denham View, Sovereign Road in Viewpoint 28. A full glint and glare technical assessment is provided in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** has identified landscape and visual receptors which would experience significant effects and identifies mitigation measures to minimise these effects - it is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance. An assessment of the inter-project cumulative effects with other existing and/or approved

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			developments in the locality must be taken into consideration, together with the HS2 and EWR projects. Do you agree with the proposed factor-specific assessment approach? This should not remove the need for a holistic assessment of the impacts.	developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
68	Appendix 2 p.160 Chapter 6	Noise and Vibration	6.7.14 Scoping questions (Noise and vibration) Do you agree with the proposed list of consultees? The impact of noise and vibration on livestock and wildlife must be considered. Owners/managers of any livestock that are not evicted from the site must be consulted on this issue. Do you agree with the proposed study areas? If the study area is limited to sub-parcels 1, 1a, 2 & 3, No. This would vastly underestimate the area affected. Certain activities (e.g. piling) would be heard over a much larger area. The nature of the local landscape is such that sound travels over considerable distances (e.g. noise from HS2 and EWR construction work can be heard across the entire valley). Do you agree that the data sources listed to inform the EIA baseline characterisation are	Owners/managers of livestock have been consulted, where appropriate, about the noise levels generated by the Proposed Development. The Applicant has been in ongoing discussions with the landowner and consultation with the local community has occurred during Phase One and Phase Two Consultation (see the **Consultation Report [EN010158/APP/5.1]**). Community liaison and communication throughout the construction phase would also be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. This typically serves to understand concerns from local residents and enable them to be addressed where feasible, thereby reducing the likelihood of complaints. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works. This is

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			appropriate? Third party noise would be expected from the continuing works associated with HS2 and EWR. Are any receptors/assets/resources not identified that you would like to see included in the EIA? See under livestock and wildlife above. The impact on noise-sensitive species in the area needs to be assessed, both during construction, operation and decommissioning. This further emphasises the need for full ecological assessments of adjoining areas, especially the woodland areas. We understand that significant magnetic fields can be associated with inverter units. The impact of this must be assessed also (e.g. on bats). Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? It is difficult to see how mitigation can be applied to a development on such a large scale in this setting. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? See above. Do you agree with the proposed factor-specific assessment approach? A holistic view is	secured in the **Outline CEMP [EN010158/APP/7.2]** and **Outline DEMP [EN010158/APP/7.4]**. The study area adopted for the noise and vibration assessment extends beyond the sub-parcels. The noise and vibration study area for the assessment of the construction and decommissioning phases of the Proposed Development considers noise and vibration sensitive receptors that are located within 300m of the Order Limits. This has been determined based on the guidance set out in BS 5228-1, BS 5228-2 and other related guidance documents, including DMRB LA 111. For the assessment of noise levels during operation (including maintenance), the study area extends out to the nearest or most exposed noise-sensitive receptors to the noise-producing elements of the Proposed Development, as shown in **ES Volume 3, Figure 13.1**: **Study Area and Receptors [EN010158/APP/6.3]**. Research has found that some species are impacted by electromagnetic fields, however, there is limited research into the effects of electromagnetic fields from equipment used in solar farms on wildlife. Electric fields are produced

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			required in addition to factor-specific assessment.	by voltage (voltage is the pressure behind the flow of electricity), they are easily blocked for example by fences, shrubs and buildings. Magnetic fields occur naturally; the Earth's magnetic field, which is caused mainly by currents circulating in the outer layer of the Earth's core, is approximately 50 microTeslas (μT) in the UK. Magnetic fields are produced by the current, which is the flow of electricity along the cable, unlike electric fields, most materials do not readily block magnetic fields. However, the intensity of both electric fields and magnetic fields diminishes with increasing distance from the source. The electrical equipment associated with the transformers and PV inverters at the Proposed Development will conform to the safety, health, and environmental protection requirements of the European Union and the United Kingdom, respectively. The CE marking will ensure that electrical and electronic equipment does not generate, or is not unintentionally affected by, electromagnetic disturbance. PV inverters will produce magnetic fields at levels lower than the underground cables, thus, considering all sources of electromagnetic radiation and their relative locations, it is predicted that the cumulative magnetic and electric fields are likely to be below

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				the acceptable exposure limits. The Proposed Development has incorporated significant buffers from the fence lines where equipment that produces electromagnetic fields is proposed, with habitat creation proposed within these buffers including grassland and scrub to help facilitate the movement of wildlife including bats. Monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the embedded mitigation. Details of the biodiversity enhancements, mitigation, monitoring surveys for bats and reporting are set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and secured within the **Outline LEMP [EN010158/APP/7.6]**. An EMF Assessment (see **ES Volume 4, Appendix 5.6: EMF Assessment (Electromagnetic Field Assessment) [EN010158/APP/6.4]**) has been undertaken to assess to potential impact of EMF on human health. It was concluded that there would not be a significant impact.
69	Appendix 2 p.161	Transport and Access	6.8.14 Scoping questions (Transport & access) Do you agree with the proposed list of consultees? We are concerned that desk-top	Wear and tear to the public road network is addressed by a proposed agreement contained in

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	Chapter 6		analyses of haulage routes will fail to understand local issues. This leads to such fanciful statements (Section 2.3.16 of the report) as "Parcels 1 and 2 are bordered by a main road, Calvert Road, which provides direct access to Botolph Claydon and Calvert." This 'main road' is a country lane already seriously damaged by HGV traffic associated with HS2 and EWR. Importantly, the proposed haulage routes involve narrow lanes totally unsuited to HGV traffic. Experience with HS2 and EWR construction traffic has been catastrophic, leading to the complete destruction of our local road infrastructure. For example, one of the roads by-passing Quainton village, identified as part the principal haulage route for the proposed Rosefield development, has been rendered virtually impassable by car as a result of HS2 construction traffic. We anticipate the same would result across our road network were the proposed project to proceed. Do you agree with the proposed study areas? We are not satisfied with assurances that all traffic would be limited to a single route. Experience with other infrastructure projects is that individual vehicles adopt their own routes to the detriment of the local communities. The	the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Construction traffic will be regulated to an approved route using the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].** Cumulative assessments have been included for committed schemes and is provided in **Appendix 15.1: Transport Assessment [EN010158/APP/6.4].** New traffic survey data has bene collected, following discussion with Buckinghamshire Council. Livestock are not classified as a protected or notable species and are therefore not considered in the Biodiversity assessment. During construction, vehicle movements on-site will be managed in line with the **Outline CTMP [EN010158/APP/7.5]** and **Outline CEMP [EN010158/APP/7.2]** to ensure works are undertaken safely. Vehicle movements during operation are minimal and are not considered to have an impact on agricultural livestock.

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			cumulative impact of any other approved solar/battery storage development in the area should be considered also. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Full traffic surveys are required but it should be understood that there are important seasonal variations in local traffic for a variety of reasons. Are any receptors/assets/resources not identified that you would like to see included in the EIA? The cumulative impact of other infrastructure projects must be taken into account. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? From previous experience, we are not confident that these measures will be successful. In any event, the damage caused by HGVs using unsuitable, country lanes cannot be prevented. HS2 and EWR haulage routes have destroyed the local road network, the substructure of the roads being totally inadequate to cope with the number and size of these vehicles. The suggestion that improvements could be made to PRoWs, given that the visual amenity associated with them	

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			would be destroyed by the proposed development, is frankly patronising. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? See above. Do you agree with the proposed factor-specific assessment approach? The impact resulting from movement of vehicles on any remaining livestock across the site must be assessed.	
70	Appendix 2 p.162 Chapter 6	Population	6.9.14. Scoping questions (Population) Do you agree with the proposed study areas? The study area is not clearly defined. What is the 'Site' in this context? The analysis should cover all of the individual communities within the ZTVs, the collective impact on the villages bordering the proposed overall development site (to include the cumulative impact accruing from HS2, EWR and other development programmes in the area) and a wider catchment area to consider the effects (e.g.) on recreational activities. We are dismayed by the superficial approach adopted as regards impacts on the population. The proposed development area consists of a number of relatively small, rural communities in villages that have developed around the largely agricultural economy of	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** presents an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. This chapter therefore considers effects on the interaction between people, community facilities and social infrastructure, commercial land and property. Due to the varying different types of effects and scale of sensitive receptors for population, there are a number of different study areas within the assessment. These are generally determined by the extent of the potential effect and the sensitivity and scale of the receptor. The study area used for each scoped in receptor is detailed in the chapter,

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			centuries. Strong, long-established interdependencies between local populations and the immediate environment are fundamental to the socio-economic survival of those communities. The report wrongly implies that there are no businesses located within the area. In order to fully understand the implications of the proposed development, a full socio-economic analysis should be undertaken. This should include, but is not limited to, the impact of the consequential eviction of tenant farmers from their farms (and, hence, livelihoods) and the associated collapse of their contribution to management of the land, which extends beyond their own agricultural businesses. There are three significant employers that are either based in the villages, or close by. All three would be negatively impacted by the proposed development since they rely on land that is either earmarked for use as part of the solar development or is bordered by it. One business is a local tourist attraction, while the other two should be considered critical suppliers to the life science sector, including key reagents to the National Health Service. These businesses employ circa. 100 people between them. Their jobs could be placed at risk as a result of this development. In the main, employees are from	and effects are considered at the 'economic' or 'population' scale, and in some cases at the 'community' scale. 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 presents how the Zone of Influence (ZoI) has been determined for certain topic areas considered within the Population cumulative impact assessment, and has considered other NSIPs in the principal study areas for population and socio-economic effects where cumulative projects are within the Proposed Development's wider study areas, including HS2. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** presents an assessment of likely significant effects on businesses, for example the agricultural economy and on the employment capacity and output of the agricultural economy. It also considers effects on tourism and the tourist economy, the value and volume of the tourist economy and its components, and on the availability of

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			the local area, with an overwhelming majority living in the surrounding villages, including East and Botolph Claydon, Steeple Claydon and Winslow. These businesses rely on local service providers and contractors, accounting for an equivalent number of livelihoods. Loss of land, reduction of production capacity and a reduction in the number of tourists/visitors to the area as a result of the proposed development are realistic negative impacts on these businesses and therefore pose a legitimate risk to the jobs of their employees. The disruption, congestion and damage to the road infrastructure should also be considered, as this will significantly impact travel for employees and customers to and from these sites. The amenity value of the area is not limited to the local population. The area attracts walkers and cyclists from a huge catchment area. It is disingenuous of the Applicant to suggest that PRoWs could be 'enhanced' when it is proposed to install huge areas of solar panels surrounded by high security fencing alongside the footpaths and bridleways that provide recreational facilities for hundreds of individuals on a weekly basis. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Given the limited resources	accommodation in the tourist accommodation sector. As set out in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]**, the Planning Inspectorate stated that an estimate of the number and types of jobs created should be provided in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. Furthermore, consideration of potential impacts should include the availability of local accommodation and services. These matters were therefore scoped into the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** assessment. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** assesses any potential impacts to agricultural land and soil quality by the Proposed Development including consideration of changes of land use of agricultural land for the duration of the Proposed Development. Wear and tear to the public road network is addressed by a proposed agreement contained in the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5].**

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			proposed and the absence of any intention to undertake surveys in the area, No. Are any receptors/assets/resources not identified that you would like to see included in the EIA? Given that the analysis appears to be limited to the 'Site' (whatever that means in this context), it is clearly inadequate for the reasons provided under comments on the Study Area. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? The adverse impact of the proposed development cannot be mitigated in the true sense of the word. The Applicant's suggestions fail to appreciate the scale of the impact on the environment and local communities. Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA? No. The Applicant appears to be limiting the scope of Receptors to the 'Site' whereas the negative impacts of the proposed development, catastrophic in themselves, are far-reaching and extend well beyond that area. Do you agree with the proposed factor-specific assessment approach? The proposed 'enhancements' to the environment have no	Construction traffic will be regulated to an approved route using the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5]**. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** also includes an assessment of effects on walkers, cyclists and horse riders and their ability to use PRoW and Permissive Paths for recreational use and community connectivity. It is reported that the creation of new permissive paths would increase community accessibility and recreational opportunities in an area that is currently inaccessible. The 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. This is considered to result in a not significant beneficial residual effect.

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			meaning in the context of the overall destructive effects of the Applicant's proposals. The proposed Socio-Economic Statement seems to be based on simple spreadsheet analyses of jobs created vs jobs lost. This fails to understand the human costs, not only to individuals, but also to the whole structure of communities. As noted elsewhere, the communities affected by the proposed development have suffered over many years (and will continue to do so) through major projects such as HS2, EWR and the Grendon Underwood prison and local solar and battery storage projects. The cost in human terms, degradation of the environment and infrastructure, that has resulted from these schemes is incalculable. It cannot and should not be ignored when considering the consequences of yet another major infrastructure project in the same area.	
Environment Agency				
1	Appendix 2 p.165	EIA Method and Scope	Thank you for consulting us on the EIA Scoping Opinion for the above project. We have reviewed the Scoping Report, referenced EN010158 and dated 13 November 2023, and have the following advice: We disagree with the topics to be scoped in and out of further assessment	These topics have been subsequently scoped into the EIA.

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			within the Environmental Statement (ES). Flood risk, hydrology and climate resilience should be scoped in. We have provided our advice on the topics within our remit below. These are in the order prescribed by the Scoping Report for ease of reference.	
2	Appendix 2 p.165	Water	In line with NPPF, the lifetime of a non-residential development depends on the characteristics of that development, but a period of at least 75 years is likely to form a starting point for assessment. If flood risk is scoped into EIA, this ensures its early consideration in designs. This would not be the case if flood risk was scoped out of the EIA, and they only considered it through the FRA as part of DCO application. The developer will need to consider the effects of climate change in the context of flood risk through the lifetime of the development. Whilst we understand that a parameter-based approach is being applied to the assessment of uncertainty and that spatial matters are yet to be finalised. The Environment Agency believe it would be of benefit for the developer to commit to a minimum offset from watercourses both horizontally and vertically. This will help to manage future flood risk and erosion. Despite there being no main rivers	Water (including flood risk, surface water drainage and water quality) was subsequently scoped into the EIA and these comments are addressed in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2], ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]**. **ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4]** assesses climate change resilience for the construction, operation, and decommissioning phases of the Proposed Development. **Appendix 5: Sequential and Exception Tests** of the **Planning Statement [EN010158/APP/5.7]** sets out how the Applicant has followed the sequential and exception test.

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			intersecting the Order Limits, there is fluvial flood risk which must be managed (see section 2.3.14). If the developer is proposing to build infrastructure within Flood Zones 2 or 3 e.g., as suggested in Appendix B Concept Masterplan, they will need to consider the following: • Application of the Sequential Test and Exception Test. • Flood storage compensation which must be localised, level-for-level, and volume-for-volume. • Sensitive electrical equipment at least 600mm above the design flood with consideration of climate change (Climate change - GOV.UK (www.gov.uk)). • SuDS for all stages of the development. • The proximity of works to assets. • Consideration of hydrodynamics in the context of flood risk and sedimentation of the watercourse(s) e.g., from spoil storage for excavations • An assessment of future flood risk within the lifetime of the development. 5.9.21. states that: "Changes in flood risk from the construction of the Proposed Development will be managed by the good practice principles which will be documented in the Outline Construction	

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			Environmental Management Plan, which will include a construction surface water management plan and awareness training/talks for construction workers so that they are aware of the risks and how to mitigate them through working practices. It is also anticipated that a temporary drainage system will be implemented during construction (as outlined above). "We will require assessment of the flood risk to allow for appropriate mitigation of risks throughout the lifetime of the development. The CEMP or FRA, which is proposed to be submitted in support of the DCO, should provide a detailed assessment of surface water runoff hydrodynamics for all stages of the development. Notably, the storage of spoil from excavations (see 2.4.71.) may have a significant influence on the flow regime if not adequately avoided or mitigated within the proposal. We note that section 5.9.18 mentions possible mitigation measures such as: "Earth movement would be controlled to reduce the risk of silt combining with the site run-off." "Cut-off ditches and/or geotextile silt-fences would be installed around excavations and exposed ground, stockpiles to prevent the uncontrolled release of sediments from the Site." These would need to be implemented on the	

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			basis with an understanding of the existing flow regime and how the proposal will affect the hydrology. We would expect the supporting evidence to detail on evidence-based management of the flood and erosion risks. Flood risk and Hydrology 5.9.27. The developer is likely to change the flow regime with the proposal which may adversely affect flood risk. 5.9.42. The developer is proposing to address environmental impacts relating to water, flood risk and hydrology through the Flood Risk Assessment and the Management Plan(s). The assessment of flood risk and hydrology as part of the EIA will help to inform further discussions. 2.4.71. Please note our anti-culvert policy. We would oppose the culverting of any watercourses and instead prefer the installation of a temporary clear-span bridge crossing. This is in line with the Environment Agency's anti-culverting policy. We will normally only grant a permit for a culvert if there is no reasonably practical alternative, and if the detrimental effects would be sufficiently minor that a more costly alternative would not be justified or there are reasons of overriding public/economic interest. The developer should consider the effects of proposed crossings on	

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			hydrology and geomorphology. The developer will need to model the hydrology of culvert installation and how this relates to flood risk. 2.4.58. Trenchless techniques for the crossing of watercourse(s) would likely minimise interference to hydrology. 2.4.60. The proposed palisade fencing may inhibit flow paths and consideration needs to be given to the hydrodynamics which may require modelling. 2.4.63. The developer needs to consider the possible alterations to the hydrology from the interruption to land drainage as part of the EIA Scoping Report as this may adversely affect flood risk. 5.9.27. Any reduction in the natural infiltration of water into the ground will require the implementation of SuDS/surface water management to manage flood risks. 5.9.42. We should first assess the risks from and to water adequately before agreeing possible mitigations. The developer should model flood risk for the lifetime of the development with consideration of the effects of climate change. Climate Resilience Chapter 6 "Environmental factors proposed to be scoped into further assessment" also includes	

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			environmental impacts to be scoped out which were not addressed in Chapter 5 "Environmental factors proposed to be scoped out of further assessment". For example, Climate Resilience is proposed to be scoped out. We consider it appropriate to scope in Climate Resilience for operation and decommissioning. This will allow consideration of future flood risk within the lifetime of the development. Please note that the lifetime of the development should be assumed to be at least 75 years. Use of third-party models/data 4.3.1 and 4.5.5. If the developer utilises an existing model, it is important to check that it: • Represents current risk. • Uses the latest available datasets. • Complies with current modelling standards. • Is at a scale suitable for the assessment being undertaken. • Captures the detail required for a site-specific assessment. • Makes use of current climate change allowances. Please be aware that: • Environment Agency models are not designed to assess third-party developments. The developer should not assume that the model is suitable for assessing the flood risk associated	

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			with the proposed development. • It is the developer's responsibility to assess the suitability of a model for the project. • The developer should provide evidence of any modelling checks and subsequent updates and document these in the FRA model reporting.	
3	Appendix 2 p.168	Air Quality	Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and	Noted. Refer to paragraphs 6.8.4 to 6.8.6 in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** for list of Non-Road Mobile Machinery proposed. The plant would be used intermittently during construction programme, and would move across the Site as the Proposed Development is built out. Setback distances from residential properties and environmental designated sites are included within the Design Commitments **[EN010158/APP/5.9].** These distances, as well as the temporary nature of the plant to be used, and the low levels of air pollution at the Site in future years means it is unlikely there would be a risk of emissions (either in isolation or combination) that could result in an exceedance of the Air Quality Standards.

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			support their net zero objectives. We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit. Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.	
4	Appendix 2 p.169	Biodiversity	We support the applicant's intention to provide Biodiversity Net Gain as part of the proposals. New developments should not only protect watercourses and their riparian corridors but also provide overall net gain for biodiversity. Net gain for biodiversity is defined as delivering more or	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** identifies how a minimum 10% net gain in biodiversity will be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric. The

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			better habitats for biodiversity and demonstrating this through use of the Defra Biodiversity Metric. It encourages development that delivers biodiversity improvements through habitat creation or enhancement after avoiding or mitigating harm. This approach is supported by section 4.5 of National Policy Statement EN-1 and also paragraphs 174 and 179 of the National Planning Policy Framework (NPPF). The enhancement of biodiversity in and around development should be led by a local understanding of ecological networks, and should seek to include: • habitat restoration, re-creation and expansion; • improved links between existing sites; • buffering of existing important sites; • new biodiversity features within development; and • securing management for long term enhancement. The Environment Act 2021 looks to ensure that the overall impact from development on the environment is positive. The Act includes measures to strengthen local government powers in relation to net gain and a minimum	biodiversity design of the Proposed Development is cognisant of local biodiversity priorities already identified for the areas and in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, and Buckinghamshire Council. These measures focus 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. Although not yet mandatory for Nationally Significant Infrastructure Projects (such as the Proposed Development), the Applicant is still committing to achieving this as a minimum level of BNG, which will be secured by the **Outline LEMP [EN010158/APP/7.6]**. **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]** however, 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.

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			requirement of 10% biodiversity net gain. Although we recognise that provision of BNG is not yet mandatory for Nationally Significant Infrastructure Project, we encourage the applicant to consider an approach to development that results in measurable net gains in biodiversity, having taken positive and negative impacts into account. The Planning Practice Guidance (PPG) provides guidance on the application of net gain and Institute of Ecology and Environmental Management, together with CIRIA and the Institute of Environmental Management and Assessment have published guidance on how to deliver net gain in practice. These can be downloaded here.	
5	Appendix 2 p.169	Climate	Whatever final design or location is chosen the likely life span of the site will mean that it will need to operate within a changing climate. Therefore, a robust design and sensitive final location selection to accommodate future climate change impacts should be pursued. This will need to consider issues such as flood risk, increased heat, and drought, all of which could impact on the efficient running of the site. Climate change impact risk assessment and adaptation measures should include the potential	A robust design and location selection for the Proposed Development have been undertaken. Impacts including fluvial flood risk, tidal flood risk, pluvial flood risk, groundwater flood risk, sewer flood risk, and reservoir flood risk (among others) are considered in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]**. Tables 9, 10, and 11 of **ES Volume 4, Appendix 8.2: Climate Change Risk Assessment [EN010158/APP/6.4]** assess the risk of a range of potential climate hazards,

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			impact of a changing climate for the expected duration of site operations.	including increased summer temperatures, heat waves, and high heat days, increased magnitude and frequency of wildfires, increased winter precipitation, increased risk of drought (among others) on the key receptors relating to the Proposed Development, alongside the mitigation measures specific to each hazard. The embedded (Section 2.2) and additional (Section 2.5) mitigation measures also highlight the steps taking to ensure the Proposed Development is resilient to the effects of climate change.
6	Appendix 2 p.169	Land, Soils and Groundwater	The bedrock geology beneath the site consists of the West Walton Formation, Weymouth Mudstone Member, Stewartby Member and Peterborough Member all of which are mudstones and classified as unproductive strata. Superficial deposits at the site include alluvium, till, glaciofluvial deposits and glacial deposits. These deposits are classified as secondary A aquifers or secondary aquifers (undifferentiated). The site does not lie within a Source Protection Zone. We are satisfied with the matters that are proposed to be scoped in and out of the Environmental Impact Assessment and provide further comments in relation to section 6.5 and general environmental considerations of the scheme below with some general informatives	Noted. Refer to **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** and **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** for further information on these issues, as detailed below. Section 11.12.1 includes a note that any monitoring relating to potential contamination from landfill sites, if required further to consultation with the local planning authority, should not adversely affect the existing monitoring infrastructure at Calvert Pit. Calvert Pit landfill site is considered as one of the potentially contaminative pollutant sources within the conceptual site model provided in **ES Volume 4, Appendix 11.1: Preliminary Risk**

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			about the scheme at the end. Section 6.5: Land, soils and groundwater A preliminary risk assessment (PRA) report will be completed to assess the contamination potential of the potential historical landfilling in parcel 3. There is a permitted landfill site adjacent to the south-western site boundary at Calvert Pit. Construction works near this landfill must not impact on any landfill leachate or groundwater quality monitoring boreholes that may be associated with the permitted site. It would therefore be prudent to include this site within the PRA. Section 6.5.11 states that this report will, "assesses the potential risks on the existing land, soil and groundwater baseline, including contamination issues. The Preliminary Risk Assessment report conclusions and results of ground investigations will determine necessary mitigation measures to ensure that the construction, operation and decommissioning of the Proposed Development do not result in significant effects on the receiving land, soil and groundwater environment." We welcome this proposal. We are satisfied with the guidance that has been listed in section 6.5.11 in relation to the proposed assessment methodology. Groundwater has (apart from the land contamination aspect mentioned above) been	**Assessment [EN010158/APP/6.4]** (see Table 6.1). Groundwater quality has been scoped in for all phases of the proposed development, further to consultation with the local planning authority (see Table 11.2 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**), therefore this issue is considered within the chapter, with appropriate mitigation measures provided in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3, Outline DEMP [EN010158/APP/7.4]** and **Outline BSMP [EN010158/APP/7.9]**. The mitigation measures included in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** are relevant to all groundwater receptors, and strategies are provided for dealing with leaks and spills, as well as issues relating to firewater associated with the BESS (for summaries, see Sections 11.9.2 to 11.9.3 for construction, Sections 11.9.5 to 11.9.6 for operation (including maintenance) and Sections 11.9.8 to 11.9.9 for decommissioning). With respect to protection of groundwater and surface water from incidents involving firewater at the BESS, this will be addressed in multiple ways, including the adherence to mitigation measures

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			scoped out of further assessment. Instead, pollution prevention is mentioned as a means of protecting groundwater from contamination. Pollution prevention measures will be included in the Outline Construction Environmental Management Plan and Outline Decommissioning Environmental Management Plan. These measures should include all groundwater receptors and include a requirement for a remediation strategy if, for instance, any leaks or spills occur. If contamination is identified as part of the land contamination assessment works a foundation works risk assessment may be required. In relation to this, please note that the EA guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination' is currently being updated so please ensure that the most up to date version is used. Other environmental considerations BESS and firewater Battery Energy Storage Systems (BESS) have the potential to pollute the environment. Applicants should consider the impact to all environmental receptors during each phase of development. Particular attention should be applied in advance to the impacts on groundwater and surface water from the escape of firewater/foam and any contaminants that it may contain. Suitable environmental protection	listed above, as well as the **Outline Drainage Strategy [EN010158/APP/7.11]**. A piling risk assessment will be undertaken before the start of construction, as detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**. This will minimise impacts on groundwater as a result of piling activities. This will give consideration to the updated version of the EA guidance, as referred to in this consultee comment. The **Outline CEMP [EN010158/APP/7.2]** will include details relating to undertaking HDD works, including an HDD Fluid Breakout Plan (see Appendix 3).

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			measures should be provided including systems for containing and managing water run-off. The applicant should ensure that there are multiple 'layers of protection' to prevent the source-pathway-receptor pollution route occurring. We would expect risks to groundwater to be included in this management plan. Horizontal Directional Drilling (HDD) Cables for the new scheme will be laid in trenches. Where the placement of these cables takes place in land affected by contamination the management of the waste material will need to be carefully managed. Paragraph 2.4.58 states that horizontal directional drilling may be used at some locations where traditional trenching methods are not feasible. This work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. The proposed use of directional drilling techniques should be included in the Outline Construction Environmental Management Plan.	
7	Appendix 2p.171	Material Assets and Waste	Waste on site Excavated materials that are recovered via a treatment operation can be re-used onsite under the CL:AIRE Definition of Waste: Development	The Applicant has prepared an Outline Site Waste Management Plan (**Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**) in support of the DCO Application.

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			Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to our: • Position statement on the Definition of Waste: Development Industry Code of Practice and; • website at https://www.gov.uk/government/organisations/environment-agency for further guidance. Waste to be taken off site Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: • Duty of Care Regulations 1991	

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			• Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.	

ID	Ref	Description	Consultee's comment	Applicant's response
8	Appendix 2 p.172	Land, Soils and Groundwater	If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk) If they don't meet the exemption and require a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here, Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk) Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning. The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here, Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk) The use of drilling muds for the directional drilling may require a groundwater activity permit unless the	Noted. Any future requirement for environmental permits (including groundwater activity permits, in relation to HDD works) will be addressed by the Principal Contractor in accordance with the **Outline CEMP [EN010158/APP/7.2]**. It should be noted that groundwater abstraction is not proposed as part of the Proposed Development. See also **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			'de minimis' exemption applies. Early discussion about this is also recommended. If the applicant is intending to seek to disapply any of the Environment Agency's legislation, they should contact us as early as possible. Further information on this can be found here, https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advicenotes/an11-annexd/	
Fulcrum Pipelines Limited				
1	Appendix 2 p.174	N/A	NO COMMENT	Noted.
Grendon Underwood Parish Council				
1	Appendix 2 p.175	EIA Method and Scope	Due to the malleability of the design, which seeks to incorporate recommendations following various reports, the glint and glare assessment should not be excluded from the EIA scope, since the de facto impacts of the development cannot truly be ascertained until such time that the design has been finalised.	A full glint and glare technical assessment is provided in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**.
2	Appendix 2 p.175	Water	Water in every aspect, but not limited to: run off, flood risk, water quality and contamination should not be excluded from the scope of the EIA. Water and Vegetation dynamics must be	Water (including flood risk, surface water drainage and water quality) was subsequently scoped into the EIA and these comments are addressed in **ES Volume 2, Chapter 16: Water**

ID	Ref	Description	Consultee's comment	Applicant's response
			considered and cannot simply be overcome by mitigation (drainage networks) due to the flood risks identified and the elevation of the site, which will likely have an increased runoff. It appears that due consideration has not been given to hydrodynamics as a result of the reduction of biomass, specifically affecting neighbouring land (with consideration to the mineral safeguarding and flooding), heritage sites and conservation areas.	**[EN010158/APP/6.2], ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]** and **Outline Drainage Strategy [EN010158/APP/7.11]**.
3	Appendix 2 p.175	Biodiversity	It is of utmost importance that decommissioning is considered within the EIA and to suggest that its impact will be the same as construction is absurd. It is clear that there will be changes within the ecosystem, and a reduction in biomass within the area following the lifespan of the development, and as such due consideration should be required following the development's lifecycle.	Effects of decommissioning on biodiversity are detailed within are assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**. The working methods to decommission the Proposed Development would be similar to those used during construction, and would be undertaken in accordance with best practice, legislation and industry guidance at the time of decommissioning. Many of the mitigation measures required for the construction phase are also likely to be required during the decommissioning phase. The **Outline DEMP [EN010158/APP/7.4]** details and secures measures to mitigate and manage decommissioning related effects on biodiversity, including measures to prevent air, water, light and noise pollution and avoid disturbance to sensitive

ID	Ref	Description	Consultee's comment	Applicant's response
				species. Given the proposed embedded mitigation measures to improve the biodiversity value of fields within the Order Limits, the biodiversity uplift gained during the operation (including maintenance) phase may be lost if fields are returned to intensive agricultural use at decommissioning. Therefore, the likely effects of the decommissioning phase on habitats may potentially be greater than those experienced during construction. Prior to decommissioning, updated surveys, where required, would be undertaken in sufficient time in advance of works to ensure that appropriately timed mitigation can be carried out. Appropriate mitigation measures would be based on the results of the updated ecology surveys. detailed in and secured by the **Outline DEMP [EN010158/APP/7.4]** would mitigate any significant adverse effects.
4	Appendix 2 p.175	Major Accidents and Disasters	Considering but not limited to the high flood risk and the nature of the development, it would be unethical to exclude major accidents and disasters from the EIA due to the proximity to footpaths, bridleways and residents. We insist that this should be completed within the scope of the EIA since not to do so would be of detriment to our community.	**ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out the Applicant's assessment on Major Accidents and Disasters.

ID	Ref	Description	Consultee's comment	Applicant's response
5	Appendix 2 p.175	Human Health	Human and Health impacts should not be excluded on the grounds that this development should not be considered in isolation since the effects of other large scale construction projects currently underway in the local area will be compounded by the proposed development	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the development of the Project. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health.
6	Appendix 2 p.175	EMF	It is unclear why it is proposed to exclude electric, magnetic, and electromagnetic considerations from the scope of the EIA, in addition to Heat and Radiation considering its scale and proximity to highways, permanent residence and neighbouring businesses/heritage sites which are often frequented by tourists. These effects could be of detriment to residents and non-residents alike as so these effects should be given due consideration. It is known that electric devices & installations interfere and influence each other, and such surveys intend to understand and mitigate those effects under reasonable control.	**ES Volume 4, Appendix 5.6: EMF Assessment [EN010158/APP/6.4]** sets out the assessment of EMF and any potential impacts on local receptors. **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** sets out the Applicant's assessment on Heat and Radiation.
Health and Safety Executive				
1	Appendix 2 p.176	Major Accidents and Disasters	Will the proposed development fall within any of HSE's consultation distances?	The Applicant can confirm that Proposed Development is not located within the HSE

ID	Ref	Description	Consultee's comment	Applicant's response
			According to HSE's records, the proposed application boundary for this Nationally Significant Infrastructure Project is not within the consultation zones of any major accident hazard sites or major accident hazard pipelines. This is based on the site boundary 'redline' in drawing Figure 1 Rev 02 in Appendix A of the EIA Scoping Report Volume 2 Appendices downloaded from infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010158/EN010158-000011-ROSE - Scoping_Report_Appendices.pdf. HSE's Land Use Planning advice [HSE: Land use planning - HSE's land use planning methodology] is dependent on the location of areas where people may be present within HSE's land-use planning zones. As the project area 'redline' is not within any of HSE's land-use planning zones, under HSE's existing policy for providing land-use planning advice, HSE would not advise against the development. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.	consultation zone of any major accident hazard sites or major accident hazard pipelines.

ID	Ref	Description	Consultee's comment	Applicant's response
2	Appendix 2 p.176	Major Accidents and Disasters	Would Hazardous Substance Consent be needed? Based on the Scoping Report Volume 1 Main Report published 13/11/2023, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances. Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Part 4 of Schedule 1 for below-threshold substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.	This has been noted and the Applicant can confirm that no hazardous chemicals are proposed to be present at the Proposed Development. Should there be any instances of contamination, this would be disposed of in line with the hazardous waste regulations and measures set out within the Outline Site Waste Management Plan (**Appendix 1** of the **Outline CEMP [EN010158/APP/7.2]**).

ID	Ref	Description	Consultee's comment	Applicant's response
3	Appendix 2 p.177	Major Accidents and Disasters	Consideration of Risk Assessments Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G on the Planning Inspectorate's website [Advice notes | National Infrastructure Planning (planninginspectorate.gov.uk)] - Annex G – The Health and Safety Executive. This document includes consideration of risk assessments under the heading "Risk assessments". In Scoping Report Volume 1 Main Report published 13/11/2023 Section 5.5 some possible major accidents and disasters are given however the text states that they "are not considered within the scope of the existing technical assessment and will continue to be reviewed and addressed as part of the design process". It was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents. HSE would advise this is considered further in line with	Major Accidents and Disasters has been scoped out of the Environmental Statement as agreed with PINs (see response in **Section 1** above). Consideration of the risks associated with major accidents and disasters is included in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. Impacts of major accidents and disasters are considered within the **BESS Plume Assessment [EN010149/APP/7.13]**, **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**, **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**, and **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. Any relevant mitigation measures are detailed in and secured by the **Outline CEMP [EN010149/APP/7.2]**, **Outline OEMP [EN010149/APP/7.3]**, **Outline LEMP [EN010158/APP/7.6]**, and **Outline Battery Safety Management Plan [EN010158/APP/7.9]**. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** also explores health impacts in relation to 'Major Accidents and Disasters'.

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			Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive taking account of the following: "it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.". Note, there are no additional requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.	
4	Appendix 2 p.177	N/A	Explosives sites CEMHD 7's response remains the same as previous response in November 2023. No comment to make regarding this development as there are no HSE licenced explosives sites in the vicinity of the proposed development. Electrical Safety No comment from a planning perspective.	Noted.
Historic England				

ID	Ref	Description	Consultee's comment	Applicant's response
1	Late Response p. 1	Cultural Heritage	Dear Ms Down Thank you for consulting us on the scoping report for the Rosefield Solar Farm. This development could, potentially, have an impact upon a number of designated heritage assets and their settings. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets. We note the summary of designated and undesignated assets in the scoping report and the assets specifically scoped into the report under paragraph 6.4.8. Whilst we are pleased to see that these assets have been included, we are concerned that the report seeks to scope out all other assets under paragraph 6.4.9.	All non-designated heritage assets within the 1km study area and all designated heritage assets within the 5km study area have been considered within **Stage 1 Setting Assessment (Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). A detailed assessment of their significance, the contribution made by setting to this significance and the impacts of the Proposed Development on this significance are included within **Annex D** of **ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4].** Following this assessment and further engagement with Historic England and Buckinghamshire Council the assets scoped into **ES Volume 2 Cultural Heritage [EN010158/APP/6.3]** have been agreed.
2	Late Response p. 1	Cultural Heritage	We are particularly concerned that two Scheduled Monuments in close proximity to the application site have been scoped out. The Scheduled Monument known as 'Preceptory of the Knights Hospitallers, associated fishponds, medieval settlement of Hogshaw and the site of	These scheduled monuments are considered within **Stage 1 Setting Assessment (Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). A detailed assessment of

ID	Ref	Description	Consultee's comment	Applicant's response
			the medieval church of St John the Baptist, 200m south of Hogshaw Farm' (1405586) is located just outside the application, whilst the deserted village at Fulbrook Farm Scheduled Monument (List Entry Number: 1006939) lies within 1km of the site. Both these assets take some of their significance from the surrounding agricultural fields which reflect their original rural setting. Depending on the layout of the Proposed Development, there is the potential for the setting of these assets to be affected and therefore we recommend these are brought within the scope of the assessment.	their significance, the contribution made by setting to this significance and the impacts of the Proposed Development on this significance are included within **Annex D** of **ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4].** Following this assessment and further engagement with Historic England these assets have been scoped into **ES Volume 2 Cultural Heritage [EN010158/APP/6.3]** although no significant effects are predicted.
3	Late Response p. 1	Cultural Heritage	We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. Assessment and evaluation of the historic should be carried out at as early stage as possible so that the information can feed into your design. For the below-ground archaeological remains we understand a programme of geophysical survey	The potential impacts on non-designated features of historic, architectural, archaeological or artistic interest are identified within **ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). The results of the geophysical survey (**ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4]**) and subsequent trial trenching (**ES Volume 4, Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4]**) have informed the baseline used in **ES Volume 2 Cultural Heritage [EN010158/APP/6.3]** The scope of further

ID	Ref	Description	Consultee's comment	Applicant's response
			and trial trenching will be undertaken to fully assess the archaeological potential of the site.	intrusive investigation is set out in the **Draft Archaeological Management Strategy [EN010158/APP/7.10]**
4	Late Response p. 2	Cultural Heritage	We would strongly recommend that you involve the Conservation Officers and the archaeological staff at Buckinghamshire Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Engagement with Buckinghamshire Council's Archaeological Advisor (BCAS) and Built Heritage Advisor has been undertaken and this is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**
5	Late Response p. 2	Cultural Heritage	A large proportion of the proposed solar development would sit on hills and a ridgeline, which give a subtle undulating characteristic to the landscape. This is visually important in its own right because the coherence of long-ranging views over fields of varying shapes and sizes and ancient wood banks, set within a network of driveways and sunken lanes, enables us to understand the lengthy agricultural history of the area. West of this ridgeline the landscape is relatively low lying and so there is the potential	ZTVs of the Proposed Development are presented in **ES Volume 3, Figures 10.7-10.12 [EN010158/APP/6.3]** which extend to a study area of 6km as agreed with Buckinghamshire Council. This is considered sufficient to review all sensitive potential landscape and visual receptors with no significant landscape and visual effects beyond the study area adopted (as detailed within **ES Volume 2 Chapter 10 Landscape and Visual [EN010158/APP/6.2]**).

ID	Ref	Description	Consultee's comment	Applicant's response
			for the development to have far reaching impacts when looking back towards the site from the west. As well as expected viewpoints as identified in the scoping report, it's important therefore that wider views are also assessed. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	Setting effects on heritage assets are considered within the **Stage 1 Setting Assessment (Annex C and Annex D of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**). This has included consideration of long range views and visualisations presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]**. The assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Historic England and Buckinghamshire Council.
6	Late Response p. 2	Cultural Heritage	With that in mind we agree with the comments recently made by Buckinghamshire's conservation officer that there may be heritage assets, including highly graded assets that derive significance from views over wide expanses of rural landscape (e.g. Grade I Waddesdon Manor RPG). or borrow the wider rural landscape, far beyond the defined boundaries of the asset, to terminate important vistas (e.g. Grade I Wotton House RPG). We therefore recommend where there is intervisibility between heritage assets and the proposed development or the development changes the experience of the asset in the	All designated heritage assets within the 5km study area have been considered within the **Stage 1 Setting Assessment (Annex C of ES Volume 4, Appendix 9.1. ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4].** This included consideration of Waddesdon Manor and Wotton House Registered Parks and Gardens (and associated listed buildings). The assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** have been agreed with Historic England and Buckinghamshire Council.

ID	Ref	Description	Consultee's comment	Applicant's response
			landscape, those assets should be scoped into the assessment process.	Engagement with BC is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**
7	Late Response p. 2	Cultural Heritage	It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. In particular, photographs with wirelines/ shaded areas showing location of solar array and other above ground units from key points should be included. Where there is possibility that glint and glare from the solar array could be visible within sensitive historic views, we recommend a glint and glare assessment takes place and is included in submission documents.	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been prepared with refence to the **Works Plans [EN010158/APP/2.3], and** Vegetation Removal Plans within the **Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6]**, and to ensure that all impacts are understood. **ES Volume 4, Appendix 5.4 Glint and Glare Assessment [EN010158/APP/6.4]** concludes that **"**The elevation angle for the Solar PV modules will be constrained between [10 and 30 degrees], as specified in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and secured via the **Design Commitments [EN010158/APP/5.9]**…For ground-based receptors, reflections will occur very close to direct sunlight from a viewer's point of view due to the timings (dawn and sunset) and the low tilt (between 10-30 degrees). This means that the reflection will not catch the viewer unprepared and any potential impacts will be less

ID	Ref	Description	Consultee's comment	Applicant's response
				intense". No significant effects to heritage asset as a result of glint and glare are predicted. Visualisations prepared within the 3D Model were used to supplement the LVIA Visualisations throughout the EIA.
8	Late Response p. 2	Cultural Heritage	The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.	The potential impacts of construction, operation (including maintenance) and decommissioning as a result of traffic movements have been considered within the setting assessment (**ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4]**) and within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].** **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** concludes that there is a negligible risk of effects to geological units or groundwater from spills, refuelling, mobilisation of contamination HDD, piling, earthworks, excavations, construction of access tracks or fire events associated with the BESS. As such significant effects on heritage assets (including archaeological remains or deposits of geoarchaeological interest or subsidence affecting listed or non-listed buildings) are not anticipated.

ID	Ref	Description	Consultee's comment	Applicant's response
9	Late Response p. 3	Cultural Heritage	The EIA should be cross-referenced and internally coherent - the cultural heritage chapter should not be a stand-alone exercise but should refer to and make use of the findings of the landscape and visual assessment. Significant heritage assets should be considered in the LVIA as sensitive receptors.	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has been prepared with reference to **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2].** The LVIA assessment concludes that there would be significant adverse effects on three landscape character units (LCA5.7 Hogshaw Claylands, LCA 7.3 Claydon Bowl and LCA 9.1 Finemere Hill) and to users of the North Buckinghamshire Way / Midshires Way (until mitigation planting is established), Bernwood Jubilee Way, the PRoW between Calvert Road and HS2, the PRoW between Botolph Claydon and Runt's Wood, and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3, It also concludes significant adverse effects to Claydon House and to Hogshaw Farm and Wildlife Park (which lies north of the Preceptory of Knights Hospitaller scheduled monument). It should be noted that although the LVIA concludes a significant effect on these receptors due to the magnitude of change to the landscape that would be perceived from these locations, the Cultural Heritage assessment concludes that the impact (i.e. the harm to the heritage significance) as a result of this visual change would result in an effect that is not significance. This apparent

ID	Ref	Description	Consultee's comment	Applicant's response
				discrepancy in the conclusions is due to the different methodologies employed for the assessments (which follow their own established guidance) and that heritage assets derive significance primarily from their physical remains which means that changes within their setting result in lower levels of harm / adverse impact.
10	Late Response p. 3	Cultural Heritage	The applicant's heritage consultants have contacted Historic England to initiate discussions and pre-application advice - we welcome this.	Engagement with HE to date is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**
11	Late Response p. 3	Cultural Heritage	Please note these specific points from the scoping report. 6.4.6 - It does not seem that the possibility of damage particularly to archaeological deposits during decommissioning can be dismissed, especially at a distance of 40 years into the future. Some consideration should be given to this.	Impacts during decommissioning are assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]**, this includes direct impacts to archaeological remains. Mitigation for impacts will be secured through the programme of archaeological work outlined in the **Draft Archaeological Management Strategy [EN010158/APP/7.10]** and the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]** and **Outline DEMP [EN010158/APP/7.4]**. **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** has included consideration of decommissioning phase impacts on archaeological remains.

ID	Ref	Description	Consultee's comment	Applicant's response
12	Late Response p. 3	Cultural Heritage	6.4.9 - We do not think the setting of heritage assets can be defined to their immediate environs or is necessarily restricted to if there is intervisibility between the asset and the development at that time. Our published guidance The Setting of Heritage Assets; Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) (page 6) sets out that the setting of heritage assets are the 'surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. It goes on to add that as well as visual considerations, our experience of assets is influenced by other factors such as 'noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places'. To give an example, the contribution that rural environs make to a heritage asset's significance (e.g. to medieval rural parish church) is not negated because a hedge separates the asset from those environs. Therefore, a change to those rural environs is a potential impact on the significance of the asset.	The Setting of Heritage Assets; Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) guidance has been followed for the assessment **(Annex C** and **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-based Assessment and Setting Assessment [EN010157/APP/6.4].** Following this assessment and engagement with Historic England and Buckinghamshire Council the list of heritage assets scoped into **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** for effects resulting from changes to their setting has been agreed with both parties.

ID	Ref	Description	Consultee's comment	Applicant's response
13	Late Response p. 3	Cultural Heritage	6.4.10 If land for mitigation is to include new planting and screening consideration should be given to if this would have its own visual impacts and is appropriate for the historic character of the landscape. Landscaping usually remains after the solar array has been disassembled and therefore should be considered a more permanent impact. Also, such planting could potentially be damaging to archaeological remains and the land may therefore require geophysical survey.	Engagement with Historic England and National Trust has included discussion about impacts of the Proposed Development (including any proposed mitigation planting) on the historic character of the landscape. The **Works Plans [EN010158/APP/2.3]** and **Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6]** have been developed having regard to the outcomes of this engagement, in particular to avoid planting and other mitigation that would alter the character and appearance of Knowl Hill in views from Claydon House listed building and Claydon registered park and garden. The proposed programme of further evaluation set out within the **Draft Archaeological Management Strategy [EN010158/APP/7.10]** includes investigation of any areas of proposed planting or ecological mitigation that have potential to impact on archaeological remains. Consultation and engagement carried out to date is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**

ID	Ref	Description	Consultee's comment	Applicant's response
14	Late Response p. 3	Cultural Heritage	6.6.1 We are pleased that an LVIA and series of photomontages will be produced. Historic England would be happy to be consulted and aid in the selection of these viewpoints, alongside Buckinghamshire Conservation officers.	Engagement with Historic England and National Trust has included sharing viewpoints created in the 3D model. The LVIA visualisations and images from the 3D model have informed the assessment. Consultation to date is set out within Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2].**
Middle Claydon Parish Council				
1	Appendix 2 p. 178	Population Landscape and Visual Biodiversity	Executive Summary It is our view that for most people the document is too long and should have had summaries of salient points to make it more digestible. It is the opinion of our Council that the Rosefield Energyfarm Ltd proposal to develop a solar power station on 875.47 ha (2,163 acres) of farmland across the East Claydon Valley will have a huge impact on the environment, biodiversity, the farming community, local businesses and the well-being of our neighbouring communities. It is our view that the Scoping Report fails to address many of the key issues implicit in its proposals. The Applicant seems to suggest that it is "likely" that installation of a solar energy station is beneficial to the	Noted. The Applicant has set out the full ES assessment in Part 6 of the DCO Application (see **ES Volume 1 to 4 [EN010158/APP/6.1-6.4]**). A Non-Technical Summary is also provided which summarises the results of the ES assessment (see **Non-Technical Summary [EN010158/APP/6.4]**). Consideration of alternative approaches and sites is summarised in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** with further detail provided in **Appendix 1: Site Selection Report** of the **Planning Statement [EN010158/APP/5.7]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			environment but provides no evidence of this, nor is there consideration either for alternative approaches to energy generation or for alternative sites for the proposed scheme.	
2	Appendix 2 p.179	Population Landscape and Visual	<u>The Scoping Report</u> 1. A comprehensive socio-economic study must be undertaken to examine the effects of such a large scale development on the residents of all the villages (both the Claydon Parishes and all surrounding villages) which will be affected by traffic, noise, visual impact, recreational opportunities and employment. No thought has been given to the long- term effects on the community from being decimated by the loss of the farms and farmers around whom those communities have evolved over many decades. Without the farms the farmers will move away or will be forced to retire, and that important community cohesion will be lost. Scant mention was made of one local business which will be severely affected. It is the major employer in our community of skilled local staff, and this business will be severely compromised by the loss of rented land. The loss of three local farms will cause a severe impact on other businesses	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** presents an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. This chapter considers effects on the interaction between people, community facilities and social infrastructure, commercial land and property. 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 users of main roads or the majority of residents in the villages surrounding the Site as a result of the Proposed Development. The same assessment reports that there would be permanent significant effects on LCA 5.7, LCA 7.3 and LCA 9.1; two residential properties; PRoW between Botolph Claydon and Runt's Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert

ID	Ref	Description	Consultee's comment	Applicant's response
			further afield which have been suppliers of goods and services for many years. 2. Further studies must be undertaken to assess the effect on the wider population of Buckinghamshire. So far, our unspoilt landscape has been an escape and a lung for people living in built up, densely populated areas, i.e. Aylesbury, Buckingham, Milton Keynes, Oxford who come to walk the Public Footpaths for enjoyment of the open countryside, exercise and recreation. There can be no mitigation for obliterating this precious landscape with solar panels.	Road and the line of HS2; PRoW to Finemere Hill (including the permissive route to Runt's Wood); PRoW between East Claydon Road and Parcel 3 (including North Buckinghamshire Way/Midshires Way); Swan's Way/Outer Aylesbury Ring, Claydon House and Hogshaw Farm and Wildlife Park. 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 significant effects would remain for all the above locations, apart from North Buckinghamshire Way/Midshires Way and public rights of way between East Claydon/East Claydon Road to the eastern boundary of Parcel 3. It is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance.

ID	Ref	Description	Consultee's comment	Applicant's response
3	Appendix 2 p.179	Landscape and Visual Cumulative impacts	3. We acknowledge the need for renewable energy but this proposal for such a huge tract of land in an area of landscape beauty is unsustainable for the community. Smaller areas might be assimilated more easily, but the sheer scale of these 2,163 acres of solar panels, battery storage and the associated infrastructure will overwhelm the villages of Botolph and East Claydon to such an extent that they will lose their identity and become an industrial landscape. Rosefield seems to have ignored the magnitude of the impact that the development will have on the villages and their inhabitants. In some places the panels will be sited within meters of village houses, many of them listed. The scale of change will be enormous and Rosefield seems to have failed to appreciate that. 4.There are other solar developments which are pending in the same area. No consideration seems to have been given to the cumulative impact that these, together with the Statera Battery Storage installation in East Claydon and the Rosefield proposal will have on both the village residents and the wider population.	The design of the Proposed Development has undergone removal of large areas of Solar PV modules following public consultations. Following Phase Two Consultation, the removal of the option for the Rosefield Substation, BESS or Main Collector Compound in Field E23, and the commitment for Solar PV development only to be located in E23, was a direct response to feedback from the local community. 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 properties, roads and PRoW and green infrastructure proposals have been developed which include a considerable amount of proposed new hedgerow and native woodland as identified in the **Outline LEMP, Appendix 3 [EN010158/APP/7.6]**. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** reports that this has resulted in the mitigation of significant effects identified in the PEIR and that there would be no significant adverse effect on the visual amenity of users of main roads or residents in any of villages surrounding the Site as a result of the Proposed Development. The same assessment reports that

ID	Ref	Description	Consultee's comment	Applicant's response
				there would be permanent significant visual effects on Sion Hill Farm and Bernwood Farm. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** presents an assessment of likely significant cumulative effects.
4	Appendix 2 p. 179	Landscape and Visual Transport and Access Cultural Heritage	5. We have been affected by our experience of the HS2 and EWR projects and their contractors not adhering to many of their undertakings to preserve the landscape and wildlife, so we are naturally sceptical about similar promises from Rosefield. Moreover, having borne the extreme inconvenience and upheaval caused by the building of the EfW and the two rail projects for more than ten years, the population of the Claydons is dismayed at the prospect of several more years of the same. Rosefield does not seem to have been sufficiently concerned about the routes proposed for construction vehicles. The HS2 and EWR construction traffic has already caused untold damage to our fragile local roads. Several local roads are impassable except at very low speeds and both Snake Lane and Claydon Road are narrow roads, unsuitable for a large volume of HGVs. Experience from HS2 and EWR lead us to realise that HGV	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** presents an assessment of likely significant effects on archaeology and heritage. This assessment includes a study area of up to 5km surrounding the Order Limits that has been used for consideration of effects on designated heritage assets, and a 1km study area surrounding the Order Limits for consideration of effects on non-designated heritage assets. The proposed construction routes have been assessed in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** and any mitigation is secured in the **Outline CTMP [EN010158/APP/7.5]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			drivers will deviate from designated routes and cause damage elsewhere. 6. No archaeological studies have been mentioned. This is a historically significant area and Rosefield should undertake an extensive study over the whole site and not just limit it to the four parcels designated for solar panels.	
5	Appendix 2 p. 180	Air Quality	7. We feel that more investigation should be done on air quality. The only local sensor in Winslow is irrelevant and the cumulative effect of pollution from the EfW plant at Greatmoor, the construction of EWR HS2 and now Rosefield, with possibly the mega prison at Grendon Underwood as well will no doubt have a major effect on air quality, especially during the summer months.	Buckinghamshire Council has confirmed in **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.2]** that the data sources listed to inform the Air Quality assessment are appropriate and therefore no additional air quality baseline survey was required. Cumulative effects on air quality with other developments in the area on the short list (that was agreed with Buckinghamshire Council and includes EWR, HS2, and Grendon Prison) have been assessed in Section 7.7 in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
6	Appendix 2 p. 180	General	In conclusion we feel that Rosefield has concentrated its study on too restricted an area. It should be required to look at the whole area in detail to learn how the elements which make up our community environment are interdependent	Noted. The Applicant has prepared an ES assessment which looks at the whole area in detail and assesses the potential impact Rosefield Solar Farm would have (see **ES Volume 2, Chapters 6-17 [EN010158/APP/6.2]**).

ID	Ref	Description	Consultee's comment	Applicant's response
			and are not just isolated to one area. It should also be required to consult with the local population as well as specialist local wildlife groups for valuable firsthand knowledge. Our Council fully supports the East and Botolph Claydon Council's Consultation Response and we join with all our neighbours in holding the view that this application should fail.	Consultation has been ongoing with stakeholders and the local community since Phase One Consultation started in September 2023. Full details on the consultation undertaken to date can be found in the **Consultation Report [EN010158/APP/5.1]**.
Ministry of Defence				
1	Appendix 2 p. 181	N/A	Thank you for consulting the MOD on Scoping application reference EN010158. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other defence	Noted. Further consultation occurred with the MOD during Phase Two Consultation where it was noted that "This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding concerns to this proposal." (see the **Consultation Report [EN010158/APP/5.1]**). No further engagement has occurred.

ID	Ref	Description	Consultee's comment	Applicant's response
			interests. The MOD, therefore, has no objection to the development proposed. The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the National Infrastructure Planning - Planning Inspectorate website as of the date of this email. Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets. In the event that any: • revised plans; • amended plans; • additional information; or • further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.	

ID	Ref	Description	Consultee's comment	Applicant's response
National Grid Electricity Transmission Plc				
1	Appendix 2 p.182	Utilities EMF	I refer to your letter dated 13th November 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary. NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation form an essential part of the electricity transmission network in England and Wales. <u>Existing Infrastructure Substations</u> • East Claydon 400 kV Substation • Associated overhead and underground apparatus including cables <u>Overhead Lines</u> • 4YH 400 kV OHL - Cowley to East Claydon - Cowley to Leighton Buzzard to Sundon • 4YJ 400 kV OHL - East Claydon to Leighton Buzzard to Sundon - Cowley to Leighton Buzzard to Sundon	Noted.

ID	Ref	Description	Consultee's comment	Applicant's response
			Cable Apparatus • Associated cable fibre	
2	Appendix 2 p. 183	Utilities EMF	New Infrastructure Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd' NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we	The Applicant thanks NGET for the provision of the plan showing the location of NGET's apparatus in the scoping area. The Applicant and National Grid Electricity Transmission Plc have had regular discussions to co-ordinate the design of the Proposed Development with the existing National Grid Electricity Infrastructure. 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. This includes agreements on future investigations to verify asset locations, use of existing and future NGET guidance and feedback into 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.

ID	Ref	Description	Consultee's comment	Applicant's response
			use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricitytransmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity. These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed. I enclose a plan showing the location of NGET's apparatus in the scoping area.	
3	Appendix 2 p. 184	EMF Utilities	Specific Comments – Electricity Infrastructure: • NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	The Applicant and National Grid Electricity Transmission Plc have had regular discussions to co-ordinate the design of the Proposed Development with existing and future National Grid Electricity Infrastructure. The relevant National Grid standards have been adopted within the design of the Proposed Development for

ID	Ref	Description	Consultee's comment	Applicant's response
			• Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004) • If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances. • The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance. • Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse	clearances and easements that would be required within the Order Limits. The Applicant is engaging with NGET on protective provisions for their apparatus within the works area. In any event, the Applicant has included standard NGET protective provisions in the **Draft DCO [EN010158/APP/3.1**] to ensure appropriate protection for NGET assets.

ID	Ref	Description	Consultee's comment	Applicant's response
			conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above. • If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances. • Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	
4	Appendix 2 p.184	EMF Utilities	• NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent/temporary structures are to be built over our cables or	The Applicant and National Grid Electricity Transmission Plc have had regular discussions to co-ordinate the design of the Proposed Development with existing and future National Grid Electricity Infrastructure. The relevant National Grid standards have been adopted within the design of the Proposed Development for clearances and easements that would be required

ID	Ref	Description	Consultee's comment	Applicant's response
			within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place. • Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented. To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm	within the Order Limits. The Applicant is engaging with NGET on protective provisions for their apparatus within the works area. In any event, the Applicant has included standard NGET protective provisions in the **Draft DCO [EN010158/APP/3.1]** to ensure appropriate protection for NGET assets.
5	Appendix 2 p. 185	EMF Utilities	<u>Further Advice</u> We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application. Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions	The Applicant and National Grid Electricity Transmission Plc have had regular discussions to co-ordinate the design of the Proposed Development with existing and future National Grid Electricity Infrastructure. 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. The Applicant is engaging with NGET on protective provisions for their apparatus within the works area. In any event, the Applicant has included standard NGET protective

ID	Ref	Description	Consultee's comment	Applicant's response
			until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below. Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com I hope the above information is useful. If you require any further information, please do not hesitate to contact me. The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.	provisions in the **Draft DCO [EN010158/APP/3.1]** to ensure appropriate protection for NGET assets. The Applicant also assess the cumulative impact of the Proposed Development and National Grid East Claydon Substation development within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which sets out the Applicants assumptions around NGET apparatus.
NATS En-Route Safeguarding				

ID	Ref	Description	Consultee's comment	Applicant's response
1	Appendix 2 p. 203	Aviation	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	Noted. Further consultation was undertaken during Phase Two Consultation which was between 18 September – 5 December 2024.
Natural England				

ID	Ref	Description	Consultee's comment	Applicant's response
1	Appendix 2 p. 204	Biodiversity	Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 13 November 2023, received on the same day. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. Natural England have had pre-application engagement with the project. An initial meeting was undertaken on 14th September 2023, and we have since provided feedback on the proposed ecological survey effort (dated 16th October 2023).	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects upon all relevant designated sites, habitats and species and provides a robust assessment completed in line with scoping opinion (**ES Volume 4, Appendix 5.1: EIA Scoping Opinion [EN010158/APP/6.4]**), and undertaken in line with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024). The assessment of impacts to ecological receptors has informed the location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape. The Applicant has had regular discretionary advice service (DAS) meetings with Natural England throughout the Proposed Development programme, details of meetings are provided in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**.

ID	Ref	Description	Consultee's comment	Applicant's response
				Consultees and developments that are already underway and that are proposed in the local area have been contacted for information where possible, relating to ecological assessments that have been undertaken and ecological records data for the local area, along with publicly available information. The results of the data and assessments have been used to inform the assessment of cumulative effects in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**.
2	Appendix 2 p. 204	Biodiversity	Bernwood Forest The proposal could have significant impacts on Bernwood Forest. We advise that a robust assessment of the potential impacts is undertaken. Bernwood is identified as a Biodiversity Opportunity Area (BOA) and encompasses a suite of 7 local Sites of Special Scientific Interest (SSSI). In addition, the area is particularly important for Bechstein's bats which are a protected species under the Habitats and Species Regulations, 2017 (as amended). Natural England is considering the renotification, amalgamation and enlargement of the SSSIs within Bernwood under Section 28C of the Wildlife and Countryside Act 1981. E7Bernwood	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 impacts and measures to protect the ecological network. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** includes an assessment on how the land affected by the Proposed Development is currently being used by bats for foraging and commuting in order to inform the assessment. Due to the bat assemblage present within the Order Limits, and the relative importance of habitats both within the Order

ID	Ref	Description	Consultee's comment	Applicant's response
			Forest is home to nationally and regionally important bat populations; thirteen bat species are present including two Annex II species (Bechstein's and Barbastelle). The Bernwood Bechstein's population is unique for several reasons. It is located at the edge of the species range and is geographically isolated. Genetic structuring between the southwestern and northern populations of Bechstein's has been identified, within which the Bernwood population is genetically unique. The loss of this population would reduce the genetic variation of the species nationally. A report by Wright et al (2018) states: "*The identification of a population showing signs of inbreeding and low genetic diversity is of concern. This is particularly relevant to populations on the extreme edges of the British range for instance the Bernwood population, in Buckinghamshire. Such populations are likely to be more sensitive to the continual expansion of built developments and other threats that cause habitat fragmentation and loss*". In addition, a recent report concluded that although common bat species that are successfully adapted to anthropogenic environments were detected frequently on solar farms, species of conservation concern (e.g. Myotis spp. and *Barbastella barbastellus*) do not	Limits and within the wider landscape, bat species have been split into three receptors (Bechstein's bat (foraging, commuting and roosting), Barbastelle bat (foraging commuting and roosting) and other bat species (foraging commuting and roosting) (common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, Leisler's bat, serotine, brown long-eared bat, Daubenton's bat and other Myotis species)) in order to permit the nuanced assessment of impacts as a result of the Proposed Development. This has informed the comprehensive assessment of all stages of the Proposed Development presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and an assessment of intra an inter project project effects of the Proposed Development on Bechstein's bats detailed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** which has been prepared in collaboration with a leading UK bat specialist. Natural England has been consulted to discuss the potential impacts to foraging, commuting and roosting bat species which informed the identification of appropriate mitigation measures. The locations of mitigation areas have been chosen to ensure the connections between the existing SSSIs and ancient woodland adjacent to

ID	Ref	Description	Consultee's comment	Applicant's response
			use solar farms frequently Based on the information provided, the site boundary for the solar farm is directly adjacent to the woodland areas currently moving forward for designation for maternity colonies of Bechstein's bat. The fields in between these areas are used for commuting and foraging by this species, this has been shown through extensive radio-tracking and other surveys, such as dietary analysis undertaken by HS2 ecologists since 2012. We advise that the evidence base will need to identify how the land is currently being used by bats to inform your assessment of the potential impacts.	the Site would be enhanced to create a coherent ecological network that will link the Site to the wider landscape, reducing fragmentation across the wider landscape and supporting the movement of local wildlife, particularly bats.
3	Appendix 2 p. 205	Land, Soils and Groundwater	Best and Most Versatile Agricultural Land We consider the retention and safeguarding of Best and Most Versatile (BMV) Agricultural Land to be an important consideration for this project. It is recognised that due to the nature of the development a good proportion of the agricultural land affected by the development will not be permanently lost. However, the large development area and 40-year development lifetime give rise to additional concern with regard to agricultural productivity.	An assessment of BMV and soils is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation is included in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4]** and **Outline SMP [EN010158/APP/7.7]**. It is not anticipated that there would be any issues with agricultural productivity after Rosefield Solar Farm is decommissioned. The land classification on which the Proposed Development will be built is illustrated in **ES Volume 3, Figure 12.1:**

ID	Ref	Description	Consultee's comment	Applicant's response
				Agricultural Land Classification [EN010158/APP/6.3].
4	Appendix 2 p. 205	Land, Soils and Groundwater/ Biodiversity	Ancient Woodland Natural England consider that a robust assessment of the implications for ancient woodland to be of importance for this project due to the scale of the project, potential for loss of connectivity at the landscape scale and habitat fragmentation. Detailed advice on scoping the Environmental Statement, including further advice on ancient woodland and BMV land, is available below in Annex A.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and accompanying **Figures [EN010158/APP/6.3]** and **Appendices [EN010158/APP/6.4]** present a full assessment of the proposed development on ancient woodland located within and adjacent to the Order Limits. The ES proposes mitigation, where appropriate, to address likely significant effects to ensure the integrity and functionality of the ancient woodland sites is fully protected. Natural England has been consulted on potential impacts to areas of ancient woodland to inform appropriate mitigation measures.
5	Appendix 2 p.207	EIA Method and Scope	*Annex A – Natural England Advice on EIA Scoping* 1. General Principles Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes: • A description of the development – including physical characteristics and the full land use	The information that is required to be include in the ES as per the EIA Regulations 2017 is set out in **ES Volume 1, Chapters 1-5 [EN010158/APP/6.1]** and the assessment of environmental factors are set out in **ES Volume 2, Chapters 6-17 [EN010158/APP/6.2]**.

ID	Ref	Description	Consultee's comment	Applicant's response
			requirements of the site during construction and operational phases. • Appropriately scaled and referenced plans which clearly show the information and features associated with the development. • An assessment of alternatives and clear reasoning as to why the preferred option has been chosen. • A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided. • Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development. • A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors. • A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and	

ID	Ref	Description	Consultee's comment	Applicant's response
			negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment. • A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment. • An outline of the structure of the proposed ES. From the Scoping report provided, Natural England consider that these general principles have been, or will be, appropriately addressed through the EIA process.	
6	Appendix 2 p. 207	EIA Method and Scope Cumulative Effects	2. Cumulative and in-combination effects The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** provides an assessment of both intra-project combined effects and inter-project cumulative effects. The short-list of developments that is assessed with the Proposed Development for the inter-project cumulative effects was agreed with Buckinghamshire Council.

ID	Ref	Description	Consultee's comment	Applicant's response
			a. existing completed projects b. approved but uncompleted projects c. ongoing activities d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. Natural England are aware of a number of other Solar projects in the surrounding area. These should be included within the in-combination assessment and the approach to in combination assessment should be described including the distance criteria selected. The scope of an in-combination assessment should include plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include: 1. The incomplete or non-implemented parts of plans or projects that have already commenced; 2. Plans or projects given consent or given effect but not yet started;	

ID	Ref	Description	Consultee's comment	Applicant's response
			3. Plans or projects currently subject to an application for consent or proposed to be given effect; 4. Projects that are the subject of an outstanding appeal; 5. Ongoing plans or projects that are the subject of regular review and renewal; 6. Any draft plans being prepared by any public body; and 7. Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application.	
7	Appendix 2 p. 208	EIA Method and Scope Cumulative Effects	Plans or projects that Natural England are aware of that might need to be considered in the ES. - HS2 - Project has commenced - East West Rail - Project has commenced - Calvert Waste Management Complex - Project has commenced - Calvert Solar Farm - Application awaiting decision (Application ref: CM/0007/23 - Fox Covert Solar Farm, Adstockfields, Adstock, Buckingham, MK18 2JE - Project has been approved (Application Ref: 20/02582/APP) - Energy Park (Wind/Solar) at Littleton Manor Farm, Bicester Road, North West of Waddesdon, HP18 0JR - EIA Scoping Accepted (Application	An assessment of the cumulative effects of the Proposed Development with other projects is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** This includes the projects listed with the exception of Fox Covert Solar Farm as it is currently under construction/constructed and therefore does not meet the criteria required to be on the long or short-list. The Applicant has agreed the short-list with Buckinghamshire Council.

ID	Ref	Description	Consultee's comment	Applicant's response
			Ref: 22/00410/SO) Application awaiting decision (Application Ref: 22/03384/AOP)	
8	Appendix 2 p.208	Other Biodiversity	3. Environmental data Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx. Detailed information on the natural environment is available at www.magic.gov.uk Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.	Data held by Natural England has informed the EIA. Data has also been obtained from Magic, including the SSSI Impact Risk Zones dataset, and from the Buckinghamshire and Milton Keynes Environmental Records Centre for protected and noteworthy species located within the Proposed Development boundary and up to 2km from the boundary. Consultation has also been undertaken with local wildlife groups and other nearby development schemes to identify relevant data to the assessment and to obtain relevant ecology data. This has been used in combination with ecology surveys undertaken specifically for the proposed Rosefield Development to provide a robust baseline on which the ES assessment has been undertaken. The data has also helped to inform potential cumulative impacts of the proposed Rosefield development in combination with other nearby developments to ensure any potential direct and indirect impacts are appropriately mitigated for and will be detailed within the ES.

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9	Appendix 2 p. 209	Biodiversity	4. Biodiversity and Geodiversity The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account. We advise this include the emerging Local Nature Recovery Strategy (LNRS) for Buckinghamshire which will be the key mechanism for planning and mapping local delivery of the Nature Recovery Network (NRN). The NRN refers to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife Local nature recovery strategies GOV.UK (www.gov.uk). Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).	The biodiversity assessment in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** has been undertaken in line with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine v1.3 (2018, updated September 2024). Refer to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]**). A detailed biodiversity design has been developed which identifies how a minimum 10% net gain in biodiversity will be achieved in accordance with the Environment Act 2021 and NPPF, using the most up to date Defra Statutory metric, and in fact, is expected to substantially exceed this. Although not yet mandatory for Nationally Significant Infrastructure Projects (such as the Proposed Development), the Applicant is still committing to achieving this as a minimum level of BNG, which will be secured by the **Outline LEMP [EN010158/APP/7.6]**. **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**

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			Many public authorities e.g. National Highways, National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy or have agreed approaches to BNG. Further information around general duties is available here. Remember to refer to the relevant sector specific information within National Policy Statements here and our own sector specific guidance on the SD Toolkit.	**LEMP [EN010158/APP/7.6]** however, 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. All BNG mitigation and enhancement would be delivered within the Order Limits, negating the need to compensate further 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. The biodiversity design is also cognisant of local biodiversity priorities already identified for the areas and 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

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				colonise in the future given the surrounding landscape.
10	Appendix 2 p.209	Biodiversity Landscape and Visual	5. Designated nature conservation sites 5.1 International and European sites European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216 Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available here. Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.	The background data search for international and European sites identified no sites within a 10km buffer of the Proposed Development Site and no potential impact pathways to sites located further than 10km from the Proposed Development Site. The assessment presented within the **HRA No Significant Effects Report [EN010158/APP/5.3]** identified no likely significant effects to international and European sites when the Proposed Development is considered alone and in-combination. As such, an Appropriate Assessment is not considered necessary.
11	Appendix 2 p.210	Biodiversity Landscape and Visual	5.2 Nationally designated sites Sites of Special Scientific Interest Sites of Special Scientific Interest are protected	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the direct and indirect effects of the Proposed Development on

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			under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov. Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. The development site is within or may impact on the following Sites of Special Scientific Interest: Sheephouse Wood SSSI, Finemere Wood SSSI, Grendon and Doddershall Woods SSSI and Ham Home-Cum-Hamgreen Woods SSSI. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.	the citation features of SSSIs referred to by Natural England and identifies appropriate mitigation measures where necessary to avoid, minimise or reduce likely significant effects.

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12	Appendix 2 p. 210	Biodiversity Landscape and Visual	**Table 2: Potential risks to nationally designated sites:** the development is within or may impact on the following **Site name with link to citation** / **Features which the ES will need to consider** / **Potential impact pathways where further information /assessment is required** Sheephouse Wood SSSI SSSI detail (naturalengland.org.uk) — Lowland and mixed deciduous woodland; Population of nationally scarce butterfly species: • Black Hairstreak *Strymonidia pruni* — Habitat Fragmentation; Loss of supporting habitat Finemere Wood SSSI SSSI detail (naturalengland.org.uk) — Lowland and mixed deciduous woodland; Invert assemblage: • A1 arboreal canopy • F2 grassland and scrub matrix; Population of nationally scarce butterfly species: • Wood White *Leptidea sinapis*; and • Black Hairstreak *Strymonidia pruni* — Habitat Fragmentation; Loss of supporting habitat	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the direct and indirect effects of the Proposed Development on the citation features of SSSIs referred to by Natural England and identifies appropriate mitigation measures where necessary to avoid, minimise or reduce likely significant effects.

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13	Appendix 2 p.211	Biodiversity Landscape and Visual	<table><tr><td>Grendon and Doddershall Woods SSSI SSSI detail (naturalengland.org.uk)</td><td>Lowland mixed deciduous woodland Population of nationally scarce butterfly species: • Purple Emperor *Apatura iris* • Wood White *Leptidea sinapis*; • Black Hairstreak *Strymonidia pruni; and* • Brown Hairstreak *Thecla betulae*</td><td>Habitat Fragmentation Loss of supporting habitat</td></tr><tr><td>Ham Home-Cum-Hamgreen Woods SSSI SSSI detail (naturalengland.org.uk)</td><td>Lowland mixed deciduous woodland Population of nationally scarce butterfly species: • Wood White *Leptidea sinapis*; • White-letter Hairstreak *Satyrium w-album*; and • Black Hairstreak *Strymonidia pruni*</td><td>Habitat Fragmentation Loss of supporting habitat</td></tr></table>	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the direct and indirect effects of the Proposed Development on the citation features of SSSIs and identifies appropriate mitigation measures where necessary to avoid, minimise or reduce likely significant effects. 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]** and assesses the direct and indirect effects of the Proposed Development on the citation features of SSSIs and identifies appropriate mitigation measures where necessary to avoid, minimise or reduce likely significant effects.
14	Appendix 2 p. 211	Biodiversity Landscape and Visual	5.3 Regionally and Locally Important Sites The Environmental Statement should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the direct and indirect effects of the Proposed Development on non-statutory designated sites designated for nature conservation and identifies appropriate mitigation measures where necessary to avoid, minimise or reduce likely significant effects.

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			for delivering beneficial environmental outcomes. These are contacts for the relevant local body in this area who will be able to provide further information. **Table 3: Conservation Body Contacts** Contact / Email / Telephone Buckinghamshire & Milton Keynes Environmental Records Centre / erc@buckscc.gov.uk / 01296382431 Buckinghamshire and Milton Keynes Natural Environment Partnership / nep@buckinghamshire.gov.uk / N/a BBOWT / info@bbowt.org.uk / 01865 775476	
15	Appendix 2 p. 212	Biodiversity	6. Protected Species The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System. Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's (NE) charged service Pre Submission Screening Service for a review of a draft wildlife licence	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses all potential impact pathways and assesses any impacts arising from the Proposed Development across all phases which are likely to result in significant effects on protected species. The assessment is based upon up-to-date survey data collected for the Proposed Development with surveys undertaken during optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants (see **ES Volume 4, Appendix 7.1 to 7.17 [EN010158/APP/6.4]**). The survey data in combination with data collected as part of other nearby development schemes provides a robust

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			application. NE then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning For details of the LONI process. The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area. The area likely to be affected by the	baseline. Full justification for scoping out any ecological receptors is provided in the ES. The Applicant has had regular discretionary advice service (DAS) meetings with Natural England throughout the Proposed Development programme to discuss the potential impacts to habitats and species that could arise from the Proposed Development, the Proposed Development design evolution, embedded mitigation design and the potential need for EPS licenses (details of meetings are provided in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]**).The Applicant acknowledges and is aware it would need to apply for an EPS licence should the Proposed Development result in impacts or circumstances to protected species that cannot be mitigated for and would not otherwise be permitted to occur without first obtaining the relevant licence, in consultation with Natural England. The layout and embedded mitigation of the Proposed Development has been designed to ensure good connectivity is retained and protected. 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

ID	Ref	Description	Consultee's comment	Applicant's response
			development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Please note Natural England provided feedback to the applicant on the proposed survey effort (dated 16th October 2023).	solar infrastructure 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 will help to create a coherent ecological network that will link the Site to the wider landscape, supporting the movement of local wildlife, particularly commuting and foraging bats.
16	Appendix 2 p.212	Biodiversity	7. District Level Licensing for Great Crested Newts Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must	To date habitat suitability index (HSI) and environmental DNA (eDNA) surveys for GCN have been undertaken, the results of the assessment are presented in **ES Volume 4, Appendix 7.5: Great Crested Newt Habitat Suitability Index and Environmental DNA Report 2023 [EN010158/APP/6.2]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses the effects of the Proposed

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			include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider. The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent). If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required. By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural	Development on GCN. Nature Space and Natural England have been consulted regarding District Level Licensing for GCN as referred to in the ES. If the DLL approach is undertaken for the Proposed Development, then this is sufficient survey effort to inform this application. If the traditional licensing route through Natural England is decided upon then population estimate surveys will be undertaken pre-construction to inform the European Protected Species Licence.

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			England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.	
17	Appendix 2 p.213	Biodiversity	8. Priority Habitats and Species Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.	Data was obtained from Buckinghamshire and Milton Keynes Environmental Records Centre for protected and noteworthy species located within the Proposed Development boundary and up to 2km from the boundary. Where records of note were identified, these have been included in the assessment. UKHab surveys, hedgerow surveys and botanical surveys were undertaken as part of **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal 2025 [EN010158/APP/6.4]** to classify all habitats present within the Order Limits, to assess the value of hedgerows using the ecological criteria for 'Important Hedgerows' and identify any notable or scares arable non-crop plants. No open mosaic habitat or brownfield sites were recorded within or adjacent to the Order Limits. 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 appendix reports (see **ES Volume 4, Appendix 7.1 to 7.17 [EN010158/APP/6.4]**. In

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			An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of: • Any historical data for the site affected by the proposal (e.g. from previous surveys) • Additional surveys carried out as part of this proposal • The habitats and species present • The status of these habitats and species (e.g. whether priority species or habitat) • The direct and indirect effects of the development upon those habitats and species • Full details of any mitigation or compensation measures • Opportunities for biodiversity net gain or other environmental enhancement	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. This includes 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]**). Ornithological surveys are presented within **ES Volume 4, Appendix 7.4: Breeding Bird Survey Report (2022) [EN010158/APP/6.4]**, **ES Volume 4, Appendix 7.12: Breeding Bird Survey Report (2024) [EN010158/APP/6.4]**, **ES Volume 4, ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4]** and **Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** and associated figures **[EN010158/APP/6.3]** and appendices **[EN010158/APP/6.4]** identify and assess effects

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				upon all relevant designated sites, priority habitats and species including, where applicable, identifying where the Proposed Development layout has avoided these areas. It 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 including priority habitats and species. Full justification for scoping out any ecological receptors is also provided. The assessment of impacts to ecological receptors including priority habitats and species has informed the location and type of mitigation incorporated within the Proposed Development to avoid, minimise or reduce any adverse significant effects and ensure that ecological functionality and connectivity is maintained with links to the wider landscape. Consultees and developments that are already underway and that are proposed in the local area have been contacted for information relating to ecological assessments that have been undertaken and ecological records data for the local area, along with publicly available information. The results of the data and assessments have been used to inform the assessment of cumulative effects in **ES Volume**

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				2, Chapter 17: Cumulative Effects [EN010158/APP/6.2].
18	Appendix 2 p.213	Biodiversity Landscape and Visual	9. Ancient Woodland, ancient and veteran trees The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement. Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. The Environmental Statement should include details of where impacts might occur from this development proposal on the local ancient woodland and how these can be mitigated. Information that might require consideration to inform this work includes: • Any historical data for the site affected by the proposal (e.g. from previous surveys); • Additional surveys carried out as part of this proposal, likely to include detailed habitat and	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].** The Ancient Woodland Inventory, Wood Pasture and Parkland Inventory and Ancient Tree Inventory provides have been consulted as part of the assessment presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]. ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** assesses any impacts arising from the Proposed Development which are likely to result in significant effects on ancient woodland, ancient trees and veteran trees. Measures to minimise the impact of the Proposed Development to ancient woodland, ancient and veteran which takes into consideration Natural England and the Forestry Commission standing advice on ancient woodland, ancient and veteran trees are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]**, **Outline SMP [EN010158/APP/7.7]**, **Outline OEMP**

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			species surveys; • The habitats and species present; • The status of these habitats and species (e.g. whether priority species or habitat); • The direct and indirect effects of the development upon those habitats and species; and • Full details of any mitigation or compensation that might be required. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.	**[EN010158/APP/7.3], Outline DEMP [EN010158/APP/7.4]** and **Outline LEMP [EN010158/APP/7.6].**
19	Appendix 2 p.214	Biodiversity	10. Biodiversity net gain Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. It is anticipated that major development (defined in the NPPF glossary) will be required by law to deliver a biodiversity gain of at least 10% from January 2024 and that this	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** identifies how a minimum 10% net gain in biodiversity will 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**

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			requirement will be extended to smaller scale development in April 2024. For nationally significant infrastructure projects (NSIPs) it is anticipated that the requirement for biodiversity net gain will be implemented from 2025. Further information on the timetable for mandatory biodiversity net gain can be found here. Further general information on biodiversity net gain can be found here. The ES should use the Government's Biodiversity Metric together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain. The metric should be used to: • assess or audit the biodiversity unit value of land within the application area; • calculate the losses and gains in biodiversity unit value resulting from proposed development; and • demonstrate that the required percentage biodiversity net gain will be achieved. We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will	**Gain Assessment [EN010158/APP/6.4]** is based on the indicative habitat creation proposals secured in the **Outline LEMP [EN010158/APP/7.6]** however, 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 of the Proposed Development is cognisant of local biodiversity priorities already identified for the areas and in consultation with Natural England, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, and Buckinghamshire Council. These measures focus 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.

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			need to be considered. Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120,174, 175 and 180). Opportunities for enhancement might include Incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife. Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the Biodiversity Metric and is available as a beta test version. Further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain can be found in government Planning Practice Guidance.	
20	Appendix 2 p.215	Landscape and Visual	11. Landscape and visual impacts Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act,	The Chilterns National Landscape has been scoped out as detailed within **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4]** and confirmed within **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** as it is situated over 18km

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			2000 for AONBs). Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty. The National Policy Statement for the relevant sector might have stronger protections. The Energy National Policy Statement EN-1 gives significant protection including within the setting of the protected landscape. The latest versions should be checked as they are currently going through a review process. Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA. The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity. The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice	from the Site and there would be no intervisibility at this distance. Assessment has been undertaken with regard to the relevant National Character Areas, Landscape Character Types and Landscape Character Areas using the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) as presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]**. A detailed cumulative assessment is provided in **Chapter 17: Cumulative Effects [EN010158/APP/6.2].** Landscape and visual considerations have been one of the critical drivers for design decisions at all stages. The placement and height of infrastructure within Rosefield Solar Farm has been considered carefully to mitigate potential significant effects as far as practicable. 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

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			guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character. A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping	Principles (Principle 6.1) which has been used to guide the design. The **Design Approach Document [EN010158/APP/5.8]** also considers the design of the Proposed Development against relevant national and local policy and guidance, including reference to the National Infrastructure Commission 'Design Principles for National Infrastructure' and assessment against the criteria in Annex A to the Planning Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice on Good Design'.

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			stage. To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit. The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.	
21	Appendix 2 p.216	Human Health	12. Connecting People with nature The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** presents an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. This chapter considers effects on the

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			paragraph 100 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	interaction between people, community facilities and social infrastructure, commercial land and property. Effects on community and recreational facilities, land and assets and their users were assessed, whereby community land includes common land, village greens, open green space, allotments and sport pitches. This also includes an assessment of effects on walkers, cyclists and horse riders and their ability to use PRoW and Permissive Paths for recreational use and community connectivity.
22	Appendix 2 p.216	Land, Soils and Groundwater	13. Soils and Agricultural Land Quality It is recognised that due to the nature of the development a good proportion of the agricultural land affected by the development will not be permanently lost. However, the large development area and 40 year development lifetime give rise to additional concern with regard to agricultural productivity. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its important functions and services (ecosystem services) as possible. Soils are a valuable, finite natural resource and	An assessment of BMV and soils is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation included in the **Outline CEMP [EN010158/APP/7.2]**, **Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4]** and **Outline SMP [EN010158/APP/7.7]**. This demonstrates the Applicant's compliance with applicable planning policy. The scope of the surveys undertaken were agreed in consultation with Natural England, and the assessment undertaken used guidance published by Natural England for BMV agricultural land. Surveys undertaken were in accordance with the scope agreed with Natural England (a

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			should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land. The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES): • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted. This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk. • Where an ALC and soil survey of the land is	semi-detailed survey (1 auger per 2 hectares (ha) plus representative pits) where the Site is expected to comprise non-BMV land and a detailed survey (1 auger per ha) where the Site is expected to comprise BMV land). An assessment of BMV and soils is presented in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2]** and mitigation is included in the **Outline CEMP [EN010158/APP/7.2], Outline OEMP [EN010158/APP/7.3]**, **Outline DEMP [EN010158/APP/7.4]** and **Outline SMP [EN010158/APP/7.7]**. This includes assessment of any potential impacts to agricultural land and soil quality by the Proposed Development including consideration of changes of land use of agricultural land for the duration of the Proposed Development.

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			required, this should normally be at a detailed level, e.g., one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. • The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance	

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			Note Benefitting from Soil Management in Development and Construction.	
23	Appendix 2 p.217	Air Quality	14. Air Quality Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.	Impacts on ecological site was screened into the local air quality assessment, as in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**. A qualitative assessment of the likely significant effects of dust and particulate matter at designated sites within the study area during the construction and decommissioning phases has been undertaken following Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction.

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			The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001 Information on air pollution modelling, screening and assessment can be found on the following websites: • SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/	

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			• Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-yourenvironmental-permit • Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmentalpermit • Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm	
Network Rail Infrastructure Ltd.				
1	Appendix 2 p. 219	N/A	Network Rail have no comments to make at this stage and note that the impact of any glint/glare on the railway will be fully assessed. We would appreciate an opportunity to review and comment on the detailed design once the scheme reaches that stage.	A full glint and glare technical assessment is provided in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4].** A draft has been issued to Network Rail for consultation.
South Oxfordshire District Council				
1	Appendix 2 p. 220	N/A	Thank you for consulting South Oxfordshire District Council in respect of the above. I can confirm that we have no comments to make in respect of this consultation.	Noted.

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Three Rivers District Council				
1	Appendix 2 p. 221	N/A	This Council has considered the above application and has NO COMMENTS to make on the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained within the National Planning Policy Framework.	Noted.
United Kingdom Health Security				
1	Appendix 2 p.222	EIA Method and Scope	Environmental Public Health We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health.	The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** summarises how health has been considered in the development of the Project. It sets out where individual topic assessments have considered health effects and reports their significance from a health lens, and demonstrates regard and consideration of guidance on the assessment of effects on health. This document includes a health and wellbeing policy context and evidence base which summarises relevant policy and baseline information, a summary of all significant and minor significance effects (including in-combination and cumulative effects) reported in the ES, a description of these effects in terms of their relevance to health, and some contextual

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			Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted. In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental statement. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.	information on the Applicant's consideration of mental health and wellbeing effects, health determinants and pathways and receptors. When looking at Environmental Effects and Health Pathways, relevant health pathways, determinants and vulnerable population groups are identified for each topic area, in addition to both mitigation and enhancement measures that are of relevance to each environmental effect. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** is also compliant with National Policy Statements and 2022 IEMA guidance on the scoping of human health within the EIA process and determining significance for human health within EIA.
2	Appendix 2 p. 223	Air Quality	<u>Air Quality</u> The applicant states that construction phase site-specific dust mitigation measures will be recommended based on the results of pre-mitigation dust impacts assessment, which will also be applied in the decommissioning phase where relevant. The mitigation measures will be	Noted. Refer to section 6.8 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** for assessment of likely effects and Table 6.16 for dust emissions mitigation measures incorporated into the **Outline CEMP [EN010158/APP/7.2]** and **Outline DEMP [EN010158/APP/7.2]**.

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			incorporated into the Outline Construction Environmental Management Plan (OCEMP) and Outline Decommissioning Environmental Management Plan (ODEMP). UKHSA agrees that both dust and particulate emissions and traffic exhaust emissions should be scoped in for further assessment for the construction and decommissioning phases of the project owing to the proximity of human receptors to the site. <u>Recommendation</u> Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e. an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to nonthreshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.	Pollutants associated with road traffic have been assessed see paragraph 6.9.5 and 6.9.5 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2].** A qualitative assessment of the likely significant effects of dust and particulate matter at sensitive receptors during the construction and decommissioning phases has been undertaken following Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction. Construction traffic routes are planned to avoid passing sensitive villages and residential receptors where possible, to minimise the exhaust emission impacts from the Proposed Development to residential properties. Refer to Table 6.13 in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2].** Pollutants associated with road traffic or combustion was scoped out of the assessment for the operation (including maintenance) phase. Given the nature of the Proposed Development, no site activities resulting in significant emissions to air quality are anticipated during operation. No significant combustion sources such as combined heat and power plant or biomass boilers are proposed as part of the Proposed Development. The exception to this is the inclusion of two

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				backup diesel generators, which will run for one hour per month for testing purposes. As the 1-hour NO2 objective allows for 18 exceedances per year, it is considered highly unlikely that the 12 hours of operational use will combine with other nearby sources to cause an exceedance of the 1-hour NO2 objective. Therefore, the assessment has not considered emissions related to stationary combustion emissions. Refer to Table 6.3 in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2].**
3	Appendix 2 p.224	Land, Soils and Groundwater	<u>Land Contamination</u> UKHSA agrees that the assessment of potential land contamination associated with the old railway line in land parcel 3 should be scoped in for further assessment to determine the extent and severity of land contamination. However, the applicant has elected to scope land contamination associated with former agricultural activities to be scoped out. The applicant does not provide details regarding the risk assessment approach and possible mitigation measures for construction works encountering former agricultural activities such as foot and mouth pits, waste pits, pesticides, asbestos containing material (ACM).	Further to consultation with the local authority as part of the scoping process, the Applicant has scoped in contamination in all land parcels, for all three phases of the Proposed Development as detailed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** (see Table 11.2). The potential for land contamination in association with the historical railway line in land parcel 3 is therefore covered by the assessment. Further details of the historical site usage are provided in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]**. **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** assesses

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			Recommendation A risk assessment and proposed mitigation measures for if land contamination associated with former agricultural activities should also be scoped in for further assessment alongside the further assessment of the old railway line in land parcel 3.	potential risks from contamination from all sources (including the historical railway line in land parcel 3, and including potential for impacts from activities such as foot and mouth burial pits, waste pits, pesticides and asbestos-containing material), and for all development phases. Mitigation measures are considered within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** in relation to encountering existing contamination connected to the historical railway line or agricultural site use (see Sections 11.9.2 for construction, 11.9.5 for operation (including maintenance) and 11.9.8 for decommissioning).
4	Appendix 2 p.224	Major Accidents and Disasters	Major Accidents and Incidents The applicant does not consider the risk or potential impacts of chemical/fuel storage or spillages as part of the incidents and accidents section (Section 5.5) of the Scoping Report. Additionally, the applicant elects to scope out further assessment of the risk of fires and the potential impacts on local receptors. The applicant does however suggest that a plume assessment will be undertaken, and this will be submitted in support of the Development Consent Order (DCO) and will be referenced in	Major Accidents and Disasters has been scoped out of the Environmental Statement as agreed with PINs (see response in **Section 1** above). Consideration of the risks associated with major accidents and disasters is included in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**. Impacts of major accidents and disasters are considered within the **BESS Plume Assessment [EN010149/APP/7.13]**, **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]**, **ES Volume 4, Appendix**

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			the air quality chapter of the ES. The applicant also states that the Fire and Rescue Service will be consulted as part of the DCO process. Recommendation Due to our experience with lithium-ion battery fires, the associated risks, and that there are receptors within 250m of the site, we would recommend fire is scoped in for further assessment. Therefore, it would be beneficial to see the outcome of the consultation with the Fire and Rescue Service alongside the plume assessment included in the ES rather than as a separate report. Additionally, the potential risk and mitigation of chemical/fuel storage and spillages should also be considered within the incidents and accidents chapter. It is therefore recommended that incidents and accidents are scoped in for further assessment.	**16.1: Flood Risk Assessment [EN010158/APP/6.4]**, **ES Volume 2, Chapter 10: Land and Groundwater** and **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]**. Any relevant mitigation measures are detailed in and secured by the **Outline CEMP [EN010149/APP/7.2]**, **Outline OEMP [EN010149/APP/7.3]**, **Outline LEMP [EN010158/APP/7.6]**, and **Outline Battery Safety Management Plan [EN010158/APP/7.9]**. The **Health and Wellbeing Summary Statement [EN010158/APP/6.4]** also explores health impacts in relation to 'Major Accidents and Disasters'. The risk or potential impact of chemical/fuel storage or spillages has been assessed in **ES Volume 2, Chapter 10: Land and Groundwater** and **Chapter 16: Water [EN010158/APP6.2]** with the **Outline CEMP [EN010158/APP/7.2]** securing the mitigation. A **BESS Plume Assessment [EN010158/APP/7.13]** has been undertaken to assess the potential impact on air quality in the unlikely case a fire occurs. The Fire and Rescue Service has been consulted as part of the DCO process. Details on this can be

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				found in the **Consultation Report [EN010158/APP/5.1]**.
Winslow Parish Council				
1	Appendix 2 p. 225	N/A	Thank you for consulting Winslow Town Council on the information to be provided in this Environmental Statement. I write to confirm that the Town Council does not have any comments.	This has been noted.

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

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Planning Inspectorate Scheme Ref: EN010158