Rosefield Solar Farm

Applicant's Response to Relevant Representations

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February 2026
Rosefield Energyfarm Limited

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1. Introduction

1.1. Overview

1.1.1. This report provides Rosefield Energyfarm Limited's (the 'Applicant') response to the matters raised in the Relevant Representations submitted by Interested Parties concerning Rosefield Solar Farm (the Proposed Development).

1.1.2. A total of 288 Relevant Representations were submitted by Interested Parties within the Relevant Representation period (5 November – 12 December 2025). Of these:

- 1 was submitted by a local authority
- 10 were submitted by statutory consultees
- 8 were submitted by parish councils
- 9 were submitted by non-statutory organisations and individuals
- 260 were submitted by members of the public, landowners and businesses.

1.1.3. A further Relevant Representation made by Thames Water Utilities Limited was accepted by the Examining Authority on 9 January 2026.

1.1.4. All Relevant Representations have been reviewed, summarised and tabulated according to the nature of their interest in the Proposed Development. To avoid repetition, similar issues raised by members of the public, landowners and businesses have been grouped using thematic analysis.

1.1.5. The 'Reference Number' column in the table refers to the reference assigned to each Relevant Representation in the Examination Library. Interested Parties can search within this document using their allocated Representation Number (as provided within the Examination Library) to find a response to their Representation.

1.1.6. The documents submitted with the DCO Application are also referenced in this report, using the reference number [APP-X], where the numbers are the application documents number, as set out in the Examination Library.

1.1.7. All Relevant Representations have been responded to by setting out the Applicant's position on the matter at the time of writing.

1.2. Structure of this Report

1.2.1. The document is structured as follows:

- Section 2.1 – Local authorities
- Section 2.2 – Statutory consultees
- Section 2.3 – Parish councils
- Section 2.4 – Non-statutory organisations
- Section 2.5 – Members of the public, landowners and businesses.

Table 1-1: List of local authorities who submitted Relevant Representations and table number within this report

Reference Number	Local authority	Table number
RR-026	Buckinghamshire Council	Table 2-1

Table 1-2: List of statutory consultees who submitted Relevant Representations and table number within this report

Reference Number	Statutory consultee	Table number
RR-012	Anglian Water Services	Table 2-2
RR-018	Bedford Group of Drainage Boards	Table 2-3
RR-081	Environment Agency	Table 2-4
RR-109	Historic England	Table 2-5
RR-191	Ministry of Defence, Safeguarding Department Defence Infrastructure Organisation	Table 2-6
RR-200	National Grid Electricity Distribution (East Midlands) plc	Table 2-7
RR-201	National Grid Electricity Transmission Plc	Table 2-8
RR-202	National Highways	Table 2-9
RR-203	Natural England	Table 2-10
AS-032	Thames Water Utilities Limited	Table 2-11
RR-276	UK Health Security Agency	Table 2-12

Table 1-3: List of parish councils who submitted Relevant Representations and table number within this report

Reference Number	Parish council	Table number
RR-028	Calvert Green Parish Council	Table 2-13
RR-070	East Claydon Parish Council	Table 2-14
RR-072	Edgcott Parish Council	Table 2-15
RR-099	Granborough Parish Council	Table 2-16
RR-101	Grendon Underwood Parish Council	Table 2-17
RR-165	Little Horwood Parish Council	Table 2-18
RR-175	Marsh Gibbon Parish Council	Table 2-19
RR-275	Twyford Parish Council	Table 2-20

Table 1-4: List of non-statutory organisations who submitted Relevant Representations and table number within this report

Reference Number	Non-statutory organisation	Table number
RR-020	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	Table 2-21
RR-025	Buckinghamshire Business First	Table 2-22
RR-027	Callum Anderson MP	Table 2-23
RR-049	Claydon Solar Action Group Ltd	Table 2-24
RR-054	CPRE Bucks	Table 2-25
RR-100	Greg Smith MP	Table 2-26
RR-208	North Bucks Bat Group	Table 2-27
RR-252	Statkraft UK Limited	Table 2-28
RR-270	The National Trust	Table 2-29

1.2.2. For ease of reference, a table of acronyms used is provided in **ES, Volume 1 Chapter 0: Glossary [EN010158/APP/6.1] [APP-043]**.

2. Applicant's Response to Relevant Representations

2.1. Local authorities

2.1.1. The tables below set out the responses to the Relevant Representations from local authorities and the response from the Applicant.

2.1.2. The Applicant intends to submit a Statement of Common Ground with Buckinghamshire Council at Deadline 1.

Table 2-1: Buckinghamshire Council

Reference	Theme	Matter raised	Response
RR-026	Overall position	Comment that the Application is a scheme which Buckinghamshire Council cannot support, based on three key strands which are expanded upon in its Relevant Representation: 1) Inadequacy of assessments in the Environmental Statement 2) Potential harmful impacts of the Proposed Development substantially outweigh its benefits 3) That the Proposed Development has not properly responded to key constraints and has not been designed in accordance with the mitigation hierarchy.	The Applicant respectfully disagrees with Buckinghamshire Council's (BC) position on the three key strands. Responding to each strand in turn: 1) The Applicant has carried out the Environmental Statement in line with best practice and in accordance with the EIA Scoping Opinion received from PINS. The assessment has been informed by a breadth of surveys and desk-based information and has been undertaken based on the reasonable worst case to ensure a robust assessment. 2) As set out in section 10 of the **Planning Statement [EN010158/APP/5.7.2]** **[AS-027]** the combined nature of the benefits of the Proposed Development outweighs any residual effects and that the planning balance is firmly in favour of approval.

Reference	Theme	Matter raised	Response
			The Proposed Development has been designed in accordance with the mitigation hierarchy and any mitigation proposed has directly responded to key constraints in the surrounding area. Detail of this is set out in each technical chapter of the ES.
RR-026	Biodiversity – Existing wildlife	Comment that the Proposed Development has the potential to cause long-term significant harm to the functionality of the ecological network that is important to biodiversity of a national level of importance. Specific reference made to the role of the Bernwood area in supporting nationally important assemblages of bats (including three breeding colonies of Bechstein's bat) and colonies of black hairstreak butterfly, and that the Order Limits includes land important for breeding birds, wintering birds and invertebrates.	The full detailed assessment of the potential impacts on biodiversity including bats, black hairstreak butterflies, wintering and breeding birds and invertebrates is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats, along with appropriate buffers to maintain ecological connectivity and functionality of the ecological network for bats, black and brown hairstreak butterflies, other invertebrate species, breeding and wintering birds. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. Further detailed comments related to ecology receptors are given in responses below.
RR-026	Biodiversity - Bats	Comment that the Proposed Development would have a	The conclusion that the Proposed Development would have a significant adverse long-term effect (national

Reference	Theme	Matter raised	Response
		significant adverse long-term effect (national level) on Bechstein's bats and that this harm has been underestimated by the Applicant. This is due to: 1) inadequacy of survey and assessment work 2) assessment has not been based on satisfactory scientific evidence 3) there is limited understanding of the effect of solar schemes of this scale in the UK which has limited confidence.	level) on Bechstein's bats appears to be solely based on a critique of the Applicant's assessment. The Applicant disagrees with the respondent's conclusion and the detailed assessment of the potential impacts of bats (in particular Bechstein's bats) is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs, and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. Where key areas of bat activity (in particular *Myotis* activity) have been identified, specific measures have been embedded into the design of the Proposed

Reference	Theme	Matter raised	Response
			Development. Solar PV modules have been removed from a number of fields, including from: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's Bat commuting route identified by Natural England along the southern end of Three Points Lane. • Field D27, adjacent to the eastern edge of Runts Wood. • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI (known to support breeding colonies of Bechstein's Bats and other bat species). Instead, these areas would be used to provide mitigation for bats including increased foraging resources, woodland edge habitat and connectivity (see **Appendix 2: Landscape and Ecological Mitigation and Enhancements** of the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6] [APP-142]**). Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and

Reference	Theme	Matter raised	Response
			hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood. Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from centre line of existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow creating a substantial linear feature at least 30m wide between Sheephouse Wood, Shrubs Wood and Decoypond Wood to reduce potential displacement effects. Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity were recorded. Early planting and habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of Fields D30, D29 and D28, and hedgerows along boundary of Fields D30, D34 and D37) ahead of construction activities starting. This strategic planting is proposed to improve foraging and commuting habitat for bats between woodland blocks; and improve connectivity across the Site and to the wider landscape. In addition, a Collector Compound has been

Reference	Theme	Matter raised	Response
			removed from Field B10 since Phase Two Consultation which was proposed to be located adjacent to Sheephouse Wood (see **Outline LEMP [EN010158/APP/7.6] [APP-142]**). The limited evidence currently available broadly suggests that adverse effects may be felt by some bat species as a result of the solar farm operation, although the exact nature and extent of these impacts is not yet clear. Therefore, while the embedded design and additional mitigation, including reinstatement of hedgerows and creation and/or improvement of foraging habitats and linear features, are considered to be effective means of minimising the impacts on Bechstein's bat, it is not possible, at this time, to definitively state that this mitigation will be fully efficacious and therefore residual impacts cannot be fully discounted. Therefore, with due consideration to the status of the Bernwood Bechstein's bat population and the assessment of its National importance, a precautionary approach has been applied and the residual effects of the operation (including maintenance) of the Proposed Development are assessed as potentially being adverse, long-term and permanent for the duration of the operation (including maintenance) phase, in light of Bechstein's bat lifespans, and therefore potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to,

Reference	Theme	Matter raised	Response
			'significant harm' as the predicted impacts would be of a scale that would not impact the overall favourable conservation status of the species as the Proposed Development design and mitigation has focused on protecting and enhancing Bechstein's bat foraging and commuting habitat. In response to the numbered points: 1) Survey work and the conclusions reached have not been undertaken in a vacuum. Detailed information from High Speed 2 as well as site-specific survey work has informed the Proposed Development design. This has also drawn on the information provided by Natural England to support the proposed designation of a wider Bernwood SSSI, taking into account the estimated core sustenance zone and home range of Bechstein's bats. It is therefore considered that the available survey information is sufficient to assess the impacts of the Proposed Development which is both robust and appropriate. 2) The assessment has taken a precautionary approach with regards the assessment of impacts on bat species, and the design of the Proposed Development has ensured that woodland features are linked by hedgerow corridors with wide buffers to protect the roosting and foraging resource whilst also ensuring connectivity across the landscape.

Reference	Theme	Matter raised	Response
			3) Whilst there is limited understanding of how solar farms affect bat species, there has been a number of recent papers in the scientific literature that suggest solar panel may have a displacement effect on some species of bats. The Applicant is fully aware of the recent literature (and its limitations) and a full discussion has been included within the assessment detailed **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. In addition, the Applicant has undertaken an assessment of the potential for high frequency noise from electrical infrastructure and batteries to disturb commuting and roosting bats species with the conclusion that any disturbance effects are not likely to be significant. This information will be presented within the Statement of Common Ground with Natural England (to be submitted at Deadline 1). Finally a detailed monitoring strategy is outlined within the **Outline LEMP [EN010158/APP/7.6] [APP-142]**, confirming that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats.
RR-026	Biodiversity - Bats	Comment that Parcels 1, 1a and 2 are wholly within the Core Sustenance Zone for Bechstein's	It is acknowledged that Parcel 1, 1a and 2 are within the Core Sustenance Zone defined by Natural England for Bechstein's Maps. Since Phase One Consultation, the

Reference	Theme	Matter raised	Response
		bat. The home range of Bechstein's bat encompasses much of Parcel 1, all of Parcel 1a and the southernmost parts of Parcel 2, as well as the central area for infrastructure. The placement of solar panels and other works in these areas brings the Proposed Development into direct conflict with these bats.	proposed area of Solar PV modules within the Order Limits has reduced by 37.7% including Parcel 1a which is now set aside as a biodiversity mitigation area. As set out within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and detailed in the row above, buffers within Parcel 1 and Parcel 2 would be maintained and strengthened to ensure connectivity across the wider landscape. This is alongside the significant removal of proposed solar PV in keys areas for bats (particularly Bechstein's bats), for example the fields north of Finemere Wood. As presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**, given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats along with appropriate buffers to maintain ecological connectivity and functionality of the ecological network for bats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. These measures would also potentially increase invertebrate biomass leading to an increase in bat foraging resources.
RR-026	Biodiversity - Bats	Comment that the existing citations for the Bernwood area SSSI woodlands do not include bats as	It is acknowledged that the existing SSSI citations do not include bats as cited interest features. The detailed assessment in **ES Volume 2, Chapter 7: Biodiversity**

Reference	Theme	Matter raised	Response
		an interest feature. However, it is widely acknowledged that these woodlands and surrounding land support a nationally significant population of Bechstein's bat and nationally significant assemblage of bat species.	**[EN010158/APP/6.2] [APP-050]** fully acknowledges the importance of the bat assemblage that is present and has assessed bats as an ecological feature in their own right. In it's **Relevant Representation [RR-203]** Natural England confirmed that: "*The Environmental Statement has fully considered impacts to the existing SSSIs as well as the proposed Bernwood SSSI as best it can, given the status of the proposed designation, which we welcome. The importance of the Bechstein's bat population, their sensitivity, and the potential impacts from the project have been appropriately characterized.*"
RR-026	Biodiversity - Bats	Comment that not all bat survey work completed by the Applicant was compliant with survey guidelines.	Bat activity surveys were not undertaken within some fields within the Parcels due to health and safety risks associated with monitoring within cattle-grazed fields. However, the report published by Natural England to support the Bernwood SSSI designation (The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024)[1]) clearly indicates that these fields form part of the

[1] Natural England (2024). The Bernwood population of Bechstein's Bats. A Non-Technical Summary (NECR558). Available online: https://publications.naturalengland.org.uk/file/6128248514412544

Reference	Theme	Matter raised	Response
			core sustenance zone for Bechstein's. This area of the UK (and this population of Bechstein's bats) is one of the most studied, with almost continuous survey stretching back years from 2010 (and ongoing for many more years to come the current monitoring forecast is 2039). Therefore, it is already known these areas are important for foraging bats and a re-survey is not required. 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. The Applicant also consulted with Natural England with regards to survey methodology for bats. During a meeting (11 March 2025), Natural England officers agreed that the survey effort undertaken for bats was sufficient to inform the baseline in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) and additional information from HS2. The Applicant acknowledges that the information provided in the **ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4] [APP-096]** alone is not sufficient to inform a robust assessment of the likely significant effects of the Proposed Development on foraging, commuting and roosting bats. Therefore, this is only one document that has been used to inform the ES assessment and evaluation, as indicated above. This has enabled the

Reference	Theme	Matter raised	Response
			Applicant to establish a robust baseline on which the ES assessment has been undertaken. The assessment has also been undertaken in accordance with the Bat Mitigation Guidelines.
RR-026	Biodiversity - Bats	Comment that the Applicant's survey work has been supplemented by survey work carried out for the High Speed 2 (HS2) project (as reported in Natural England report NECR588) but the survey work remains insufficient as this resource is outdated, all survey types were not collected every year between 2011 and 2022 and it does not account for significant changes to the landscape made by HS2, meaning it may not accurately reflect how the population present may be affected by the Proposed Development.	Since the PEIR was published, further bat surveys have been undertaken by the Applicant, which has fed into the final assessment undertaken for bats presented within the ES. These are detailed within **ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP/6.4] [APP-100]** and **ES Volume 4, Appendix 7.16: Paired Static Bat Detector Survey Report (2025) [EN010158/APP/6.4] [APP-102]**. The survey approach to assessing commuting and foraging bats has been developed by competent experts, informed by previous surveys undertaken by HS2 and Natural England. Together with data collected by the Applicant, this provides a robust evidence base of how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development. The Applicant consulted with Natural England with regards to survey methodology for bats. During a meeting (11 March 2025), Natural England officers agreed that the survey effort undertaken for bats was sufficient to inform the baseline in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical

Reference	Theme	Matter raised	Response
			Summary of the Evidence report (Natural England, 2024) and additional information from HS2. The Applicant acknowledges that the information provided in the **ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4] [APP-096]** alone is not sufficient to inform a robust assessment of the likely significant effects of the Proposed Development on foraging, commuting and roosting bats. Therefore, this is only one document that has been used to inform the ES assessment and evaluation, as indicated above. This has enabled the Applicant to establish a robust baseline on which the ES assessment has been undertaken. Bat activity surveys were undertaken within the areas of the Order Limits where above ground Solar PV modules are proposed. With respect to the cable route, which would result in short-term, temporary effects adjacent and between the areas of solar PV, it is considered that the data set collected was suitable to assess any effects on commuting and foraging bats.
RR-026	Biodiversity - Bats	Disagreement with the Applicant's approach to identify a 'significant impact' on Bechstein's bats and differentiate this from 'significant harm', including that significant effects on roosting, foraging and	**As stated within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** (paragraph 7.10.132 and 7.10.133), the limited evidence currently available broadly suggests that adverse effects may be felt by some bat species as a result of solar farm operation, although the exact nature and extent of these impacts is

Reference	Theme	Matter raised	Response
		commuting could lead to potential significant harm, that the data relied upon to propose mitigation is out of date and incomplete and therefore cannot be relied upon to avoid, reduce, mitigate or offset identified impacts.	not yet clear. Therefore, while the embedded design and additional mitigation, including reinstatement of hedgerows and creation and/or improvement of foraging habitats and linear features, are considered to be effective means of minimising the impacts on Bechstein's bat, it is not possible, at this time, to definitively state that this mitigation will be fully efficacious and therefore residual impacts cannot be fully discounted. Therefore, with due consideration to the status of the Bernwood Bechstein's bat population and the assessment of its National importance, a precautionary approach has been applied and the residual effects of the operation (including maintenance) of the Proposed Development are assessed as potentially being adverse, long-term and permanent for the duration of the operation (including maintenance) phase, in light of Bechstein's bat lifespans, and therefore potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts will be of a scale that will not impact the overall favourable conservation status of the species as the Proposed Development design and mitigation has focused on protecting and enhancing Bechstein's bat foraging and commuting habitat. This area of the UK (and this population of Bechstein's bats) is one of the most studied, with almost continuous

Reference	Theme	Matter raised	Response
			survey stretching back years (and ongoing for many more years to come). Radio-tracking was undertaken in 2022 and forms part of the dataset which underpins The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024). Older survey work does not become obsolete when it is part of a continuous sequence; it provides context. The survey effort is considered adequate to determine the status of Bechstein's bats. The survey approach to assessing commuting and foraging bats has been developed by competent experts, informed by previous surveys undertaken by HS2 and Natural England. Together with data collected by the Applicant, this provides a robust evidence base of how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development. The Applicant consulted with Natural England with regards to survey methodology for bats. During a meeting (11 March 2025), Natural England officers agreed that the survey effort undertaken for bats was sufficient to inform the baseline in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) and additional information from HS2. The Applicant acknowledges that the information provided in the **ES Volume 4, Appendix 7.10: Bat**

Reference	Theme	Matter raised	Response
			Activity Survey Report (2024) [EN010158/APP/6.4] [APP-096] alone is not sufficient to inform a robust assessment of the likely significant effects of the Proposed Development on foraging, commuting and roosting bats. Therefore, this is only one document that has been used to inform the ES assessment and evaluation, as indicated above. This has enabled the Applicant to establish a robust baseline on which the ES assessment has been undertaken.
RR-026	Biodiversity - Bats	Comment that significant weight should be afforded to the potential harm to Bechstein's bat in line with NPS EN-1 (paragraph 5.4.43).	The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** recognises, through Section 10.2, that the residual adverse biodiversity effects set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** are effects that are 'potentially significant'. Potentially significant effects are not synonymous with or as certain as an identified likely significant effect. These potentially significant effects have been identified as the impact of solar farms on bat species is not well understood at present, with limited research available on which to build a common consensus. Therefore, the potentially significant effects have been identified to capture the precautionary worst-case effects. However, these effects do not carry the same weight in decision-making as identified likely significant effects. Further, both Chapters confirm that the identified potentially

Reference	Theme	Matter raised	Response
			significant effects do not amount to significant harm which therefore means that the Proposed Development is compliant with Paragraphs 5.4.42 and 5.4.43 of NPS EN-1 (2024). Further information on the conclusions of the assessment of the potential effects of the Proposed Development on Bechstein's Bat is available within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** (paragraph 7.10.132 and 7.10.133).
RR-026	Biodiversity - Bats	Comment that there are issues with the Applicant's survey effort for bats in the proposed location of solar PV in fields B7, B8, B10, B11 between Shrubs Wood and Sheephouse Wood SSSI, and fields D28 and D29 between Finemere SSSI and Runts Wood, which have the greatest potential to result in significant impacts on Bechstein's bat compared to other fields. Request for a precautionary approach to be adopted due to lack of information about the impact of solar farms on bats, with removal of solar PV in these fields to	The Applicant is not intending to remove Solar PV panels from these fields. The Applicant has already undertaken a precautionary approach and setbacks from hedgerows specifically within Fields B6, B7, B8 and B10 that link Shrubs Wood, Sheephouse Wood and Decoypond Wood have been increased to 15m following consultation. Bat activity surveys were not undertaken within some fields within the Parcels due to health and safety risks associated with monitoring within cattle-grazed fields. However, the report published by Natural England to support the Bernwood SSSI designation (The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) clearly indicates that these fields form part of the core sustenance zone for Bechstein's. Therefore, it is already known these areas are important for foraging bats and therefore a re-survey is not required.

Reference	Theme	Matter raised	Response
		substantially reduce the likelihood of significant effects on Bechstein's bat, noting this approach is reliant upon the insufficient survey effort and therefore might not resolve concerns.	
RR-026	Biodiversity - Bats	Comment that the land between Finemere SSSI and Runts Wood is described as important for Bechstein's bat foraging and commuting in the Natural England report.	This comment is noted. In response to this, as outlined in the **Outline LEMP [EN010158/APP/7.6]** [APP-142], Fields D28 and D29 between Finemere and Runts Wood have had the buffer from the hedgerow increased to 30m to strengthen the habitat link and the removal of Solar PV from Fields D30 to D37 along the edge of Finemere Wood. These areas are now proposed to be managed to provide optimal bat foraging habitat.
RR-026	Biodiversity - Bats	Comment that habitat between Sheephouse Wood SSSI and Shrubs Wood is considered to be an area of relatively high bat activity, and the hedgerows connecting these two woodlands and the hedgerow leading eastwards from Shrubs Wood further supports a high percentage of trees identified as suitable for supporting maternity roosts, including for Bechstein's bat. There	Fields B6, B7, B8, B9 and B10 have a strategic location between Decoypond Wood and Sheephouse Wood, lying alongside planting which is designed to provide an alternative flight path for bats that previously used the HS2 line. Setbacks from hedgerows specifically within Fields B6, B7, B8 and B10 that link Shrubs Wood, Sheephouse Wood and Decoypond Wood have been increased to 15m following consultation with Natural England and recognising that these hedgerows provide key routes for commuting and foraging bats. Within these buffers, a mosaic of grassland and scrub is proposed, along with

Reference	Theme	Matter raised	Response
		has been no further assessment to identify whether these trees do support bat roosts, in line with Bat Conservation Trust survey guidelines to assess potential impacts.	strengthening the existing hedgerows to provide a wide corridor link between these woodlands, helping to reduce potential displacement effects from Solar PV panels to foraging and commuting bats and ensure the connectivity between these woodlands is maintained. B6 is smaller cattle-grazed field on the western boundary of Shrubs Wood. The western border of B7 (grassland) is adjacent to planting which links Sheephouse Wood and Decoypond wood with the Calvert lakes to the north. To its north (broadly) is B6, both linked via offsets to Shrubs Wood. To its east are B10 (arable) and B8 (grassland). B10 (arable) is bordered by Shrubs Wood to the north and B8 to the south; B8 also abuts Sheephouse Wood. All field boundaries are subject to a 15m offset from hedgerows and 30m offset from woodland blocks. In response to Natural England's request to remove Solar PV from B6, B7 and B8 on the basis that inadequate value has been ascribed to these fields, the Applicant has already adequately considered impacts on roosts, foraging and commuting routes. Roosts in woodlands and within hedgerows are protected with buffers; these buffers have been increased in the fields of concern (hedges along fields B3/B7, B6/B7, B7/B10, B7/B8, B10/B11, B8/B9). Natural England has stated that buffers should be measured from each hedgerow's outer limits (a variable width) and, if not, that additional width should be added to

Reference	Theme	Matter raised	Response
			each buffer. Natural England has (explicitly) not taken into account that there is an additional 5m from the security fence to the first set of panels; it has said that this is because the management differs, and therefore that width is not relevant. However, that depends on whether the buffer zones are to maintain connectivity or provide a foraging resource. The Applicant has proposed buffer zones to maintain connectivity, and specifically to minimise the risk of displacement to commuting bats. Commuting routes are protected by wide buffers that are wider than the distance over which the echolocation calls of Bechstein's bats are likely to operate, giving some indication that these buffers should be adequate/effective. In any case, the 'additional' 5m strips would not be intensively managed but sown to meadow and (where achievable) lightly grazed. For most fields under current management, the invertebrate biomass would be relatively low due to standard agricultural practices, so it is unlikely that the land adjacent to most existing hedgerows offers a hugely valuable resource. In other words, their value is the hedgerow structure and connections to the wider landscape, and this is being retained. The grassland habitat proposed to be removed would be replaced by more than twice as much grassland, of greater value. Mitigating the loss of foraging resource is therefore not dependent on the buffer zones. Much of

Reference	Theme	Matter raised	Response
			that mitigation is between Runts Wood and Finemere Wood, which is close to many more identified Bechstein's roosts than the fields targeted by Natural England. Indeed, few Bechstein's roosts are known from Sheephouse, Shrubs and Runts Woods, the woodlands closest to B6, B7, B8, B10. It is true that habitat immediately north, east and west of both Decoypond Wood and Sheephouse Wood SSSI has been identified as one of 'the most frequently used non-woodland core foraging areas'; however, this description was also given to habitat immediately north, south and west of Finemere Wood SSSI, which includes areas targeted for habitat enhancements. Mitigation is being provided at a landscape-scale within the Core Sustenance Zone of Bechstein's bat. The Applicant has strived to ensure the retention and protection of the available roost resource and the worst-case scenario is that up to 16 trees may require removal. All trees have been subject to an initial ground level roost assessment, of which only three of those threes were assessed as having features suitable to potentially support maternity roosts (PRF-M) and four as having features potentially suitable for only individual bats or very small numbers of bats (PRF-I). Trees considered to pose a risk of supporting the more important roosts, i.e. those supporting PRF-M are all located to the north-east of Runts Wood. These are within the 3km Core

Reference	Theme	Matter raised	Response
			Sustenance Zone of Bechstein's bats, but outside of their recorded home range. A final climbing survey would be conducted prior to felling. There is uncertainty over how (and in what circumstances) this displacement operates and over what distance the effect is manifest. Overall, it is considered that the approach taken with regards to mitigation is appropriate and robust, taking a whole landscape approach.
RR-026	Biodiversity - Bats	Concern that fields between Sheephouse Wood, Romer Wood and Three Points Lane, and D27 east of Runts Wood are identified for internal access corridors due to potential changes to the habitats in these areas which could significantly affect foraging and commuting Bechstein's bats. Request for more information about the nature and scale of works in these fields.	The internal access corridor from Three Points Lane via Runts Wood is for the use of an existing surfaced track to access Fields C1 to C3 which have been set aside for enhancement and mitigation, namely conversion to flower rich grassland and new scrub and hedge planting. Fields SA5 to SA8 are retained as an additional option in case use of the existing track is not possible. The only access will be occasional agricultural machinery to access Fields C1 to C3 for habitat creation and then management and maintenance purposes. Therefore, no negative impacts on foraging bats are envisaged, indeed habitat enhancement in Fields C1 to C3 is likely to improve foraging for bat species.
RR-026	Biodiversity - Bats	Comment that proposed bat activity surveys during the operation (including maintenance) phase are insufficient for monitoring potential impacts on bats (spring, summer	The **Outline LEMP [EN010158/APP/7.6]** [APP-142] outlines that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the

Reference	Theme	Matter raised	Response
		and autumn of years 1, 3, 5 and 10 (with such surveys then being reviewed)). Comment that the Applicant must monitor the use of the Order Limits by roosting, commuting, and foraging bats and that monitoring work includes monitoring of temporary flightlines.	embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats. It is proposed that further detail would be added into the **Outline LEMP [EN010158/APP/7.6] [APP-142]** at Deadline 1 of the examination to set out the methodology of the monitoring strategy. Further engagement is proposed with Natural England to discuss this in further detail. This would also confirm that the final bat monitoring programme within the detailed Landscape and Ecological Management Plan would be submitted to and approved in writing by the relevant local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development. The strategy will be developed in line with CIEEM's Bat Mitigation Guidelines (Chapter 9) to monitor the effectiveness of the mitigation proposed in relation to bats.
RR-026	Fragmentation of ecological networks	Comments that important ecological networks would be fragmented due to direct and indirect effects of the Proposed Development, including: • The loss of 2,060m of hedgerow, of which all should be considered permanent loss due to time needed for reinstatement	It is acknowledged that new hedge planting would take some time to fully establish (perhaps 10 years) but this certainly does not equate to permanent loss. The Applicant recognises the historical and ecological significance of the hedgerow network as detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Any gaps would be kept to a minimum and where possible gaps would be reinstated in a similar alignment and similar suite of

Reference	Theme	Matter raised	Response
		(where this is proposed), that many of these hedgerows are historic and some within the Order Limits meet Hedgerow Regulations criteria to qualify as 'important'. • Potential removal of up to 16 individual trees • The loss of a range of other semi-natural habitats • Indirect impacts of solar farms on biodiversity as indicated by research including altered bat behaviour, collision risks, loss of ground nesting bird habitat, altered invertebrate behaviour, impacts on food chains and ecosystems • Short term impacts of construction activities, with reference to lack of surveys completed for outside main parcel areas.	species to that being lost, with 4.17km of new and reinstated hedge planting proposed. The **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050] and Outline Construction Environmental Management Plan [EN010158/APP/7.2] [APP-138]** outline measures to ensure maintenance of the linear nature of any gaps so that bats can continue to navigate along a linear feature until the reinstated hedgerows have had time to establish sufficiently. The design of the Proposed Development has ensured that number of trees that require removal has been kept to a minimum and up to 16 individual trees (with no loss of woodland habitat) are likely to require removal. 435 new individual trees would be planted, but it is acknowledged that they would take some time to reach maturity. Each of the trees to be removed that has the potential to support roosting bats would be subject to inspection to confirm the presence or otherwise of roosting bats and inform appropriate mitigation secured via the **Outline CEMP [EN010158/APP/7.2] [APP-138]**. The loss or modification of other semi natural habitat (mainly arable farmland and modified grassland) due to the placement of Solar PV would be appropriately compensated for by the habitat enhancement and creation proposals outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** which includes

Reference	Theme	Matter raised	Response
			sympathetic management of grassland within fields where Solar PV panels are proposed. The full impacts of the proposed development on biodiversity is set out in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. The only area where detailed species-specific survey work has not occurred is the cable route corridor as the impacts are short term and temporary, and sufficient detail has been gained from the species-specific surveys elsewhere to be able to robustly assess the potential effects of the cable route works.
RR-026	Breeding birds	Comment that there is a significant assemblage of breeding birds within the Order Limits, of which 20 have amber conservation status (district, and for five species county, level importance), and that the following controls must be secured and/or information provided: • Commitment to not carry out vegetation removal during breeding bird season or that a competent person conducts surveys.	The **Outline CEMP [EN010158/APP/7.2]** [APP-138] outlines the pre-construction survey work, appropriately qualified staff and mitigation measures that would be employed to prevent significant effects on nesting bird species and already address the points raised. The **Outline LEMP [EN010158/APP/7.6]** [APP-142] outlines the proposed landscape planting, including hedgerows. The final LEMP would include a commitment to undertaking a detailed landscape assessment prior to construction to target proposed hedge enhancements and new planting to ensure interventions are appropriate and deliver a mosaic of management and growth profiles. This would be developed in consultation with stakeholders.

Reference	Theme	Matter raised	Response
		• Provision of details of proposed grassland, field margin and mixed scrub. • Provision of detail of proposed hedge enhancements and the inclusion of a mosaic of hedge management and growth profiles. • Protection measures for nesting birds during construction. • Temporary works areas to be assessed to ensure measures can be implemented to prevent harm to ground nesting birds. • A monitoring programme for all breeding birds within the Order Limits.	In addition, the **Outline LEMP [EN010158/APP/7.6] [APP-142]** outlines the detailed monitoring programme for the operational period which would include monitoring of breeding and wintering birds. The final bird monitoring programme within the final LEMP would be submitted to and approved in writing by the relevant local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development.
RR-026	Wintering birds	Comment that there is insufficient evidence that effects on wintering birds can be mitigated and request for the following: • An assessment of wintering birds in parcel 3	Wintering bird surveys are detailed within **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4] [APP-097]**. Surveys were undertaken between October 2021 and March 2022, and between November 2023 and March 2024. No survey work was undertaken in Parcel 3 during 2023-2024 as access could not be obtained. However, the Applicant had data for Parcel 3 from 2021-2022 and from adjacent

Reference	Theme	Matter raised	Response
		• Justification that 5% winter field margins is sufficient to accommodate wintering birds and details what this consists of and any management prescriptions. • A monitoring programme for wintering birds.	fields in 2023-2024. This, combined with the fact that arable and improved grassland present in Parcel 3 is well represented elsewhere on site means the Applicant has sufficient data on which to base its assessment. The assessment of potential impacts on wintering birds is set out in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. The 5% of winter field margins are where it is proposed to provide a source of winter seed for granivorous birds during the winter month. It is not intended to be the only area of habitat available to wintering birds which would instead include the retention of all woodland, the majority of hedgerows and associated buffers as well as mitigation areas without Solar PV panels: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood. • Field D27, adjacent to the eastern edge of Runts Wood, • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI. The areas where embedded mitigation has been incorporated into the design of the Proposed Development would take land out of agricultural

Reference	Theme	Matter raised	Response
			production and seek to recreate pasture habitat which would be managed appropriately for ground nesting birds, as well as for wintering birds during the operational (including maintenance) phase. The embedded mitigation secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]** includes for the creation and/or improvement of species-rich grassland, scrub, hedgerows, arable field margins and woodland, resulting in an increase of suitable foraging habitat for barn owl, red kite, hobby and peregrine falcon across the Site. All woodland and the majority of hedgerow habitat would be maintained and available for wintering birds as it is now. In addition, the mitigation areas proposed would see the creation of extensive areas of new flower rich pasture habitat which would likely provide sufficient foraging habitat for wintering bird species and be of particular value to lapwing and snipe. The proposed restoration of defunct ponds within the Order Limits would also benefit snipe. Arable margins sown with wild bird seed mix would further add to wintering bird habitat. The **Outline LEMP [EN010158/APP/7.6] [APP-142]** also details the management prescriptions for winter field margins which states retaining vegetation throughout winter, sow 1 year mixes annually and 2 year mixes every over year and re-sowing bird plots if they fail to establish.

Reference	Theme	Matter raised	Response
			The **Outline LEMP [EN010158/APP/7.6]** [APP-142]also includes a commitment to monitoring wintering birds during the operational (including maintenance) phase as well as an outline strategy. The final ornithology monitoring strategy will be agreed with stakeholders and produced as part of the final LEMP.
RR-026	Invertebrates	Comments on survey efforts for invertebrates including: • Surveys for black and brown hairstreak butterfly should be undertaken given the importance of this species, and significant survey effort will be required for sections of hedgerow proposed to be removed. Request for detail in the Outline CEMP to be expanded and include translocation. • Targeted survey work for other invertebrates should be undertaken. • Disagreement that aquatic invertebrates can be scoped out due to research indicating solar	Given that it is understood that both species are present and rely on blackthorn, the presence of both black and brown hairstreak butterflies has been assumed for the purposes of the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. In addition the **Outline CEMP [EN010158/APP/7.2]** [APP-138] makes a commitment to survey all hedgerow sections to be removed for Hairstreak species so that the sections containing overwintering eggs can be safeguarded and translocated as required. Appropriate survey work will be detailed in the final CEMP in consultation with relevant stakeholders. The **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] has not identified any significant effects on invertebrate species. Targeted survey work for other invertebrate species has not been undertaken, on the basis that habitats most likely to support specialist invertebrates have been mainly (hedgerows and individual tress) or all (ancient woodland) retained and that the habitat directly affected

Reference	Theme	Matter raised	Response
		panels can negatively impact these species. • Indirect effects of solar panels on terrestrial invertebrates should be assessed, and any resulting effects on bats and birds.	(arable and modified grassland) is highly unlikely to support an invertebrate assemblage of any importance. The habitat creation and enhancement measures outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** would benefit the invertebrate assemblages present. The Applicant has considered the impact of solar panels on invertebrates and any resulting effects within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**, with the main potential impact of solar panels on invertebrates cited in the available scientific literature relating to the lake effect. This is concerned with light polarisation and the potential for aquatic invertebrates to mistake Solar PV panels for water and die whilst laying their eggs on panels. However, it is important to note that modern Solar PV modules have anti-reflective coatings intended to minimise light polarisation and thereby reduce the type of effects that have been cited. In addition, individual fields with solar PV panels are broken up significantly by retained woodland and hedgerows and the associated buffers, meaning that there is less potential for fauna to mistake the development as a single large expanse of water. An assessment of the effect of the Proposed Development on aquatic invertebrates is discussed in **ES**

Reference	Theme	Matter raised	Response
			Volume 4, Appendix 7.9: Preliminary Aquatic Survey Report (2023) [EN010158/APP/6.4] [APP-095]). Well-designed and well-managed solar farms can significantly benefit invertebrates by providing valuable new habitats and food resources, especially in landscapes dominated by intensive agriculture. Studies[2] have shown that solar farms with biodiversity management plans have higher invertebrate abundance and species richness compared to traditional farmland.
RR-26	Reptiles	Comment that it cannot be concluded there would be no significant effect on reptiles as survey effort is insufficient and bespoke mitigation has therefore not been considered.	Survey work carried out has not highlighted any habitat of significant value to reptiles. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has taken a precautionary approach and assumed that a small population of species such as slow worm could be present, with safeguards outlined in the **Outline CEMP [EN010158/APP/7.2] [APP-138]** preventing any likelihood of harm during the construction phase. It should also be recognised that the design of the Proposed Development, with the retention of all woodland habitat and the majority of hedgerows with significant buffers, would likely safeguard the habitat areas most likely to be used by reptiles. In addition the

[2] Study produced by Solar UK (Solar habitat Report 2025) Available on,ine accessed 26/01/2026 https://solarenergyuk.org/resource/solar-habitat-2025/

Reference	Theme	Matter raised	Response
			habitat creation and enhancement proposals outlined in the in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** would likely benefit reptiles. Given the precautionary approach taken and the survey information gathered within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** the Applicant maintains the conclusion that the Proposed Development would likely have no significant negative effect on reptiles, and overall is likely to provide a significant benefit for reptiles.
RR-026	Embedded mitigation measures	Comment that offsets to habitat types are generic and these should be bespoke to the value and important of boundary features.	The Applicant respectfully disagrees with this comment. Proposed buffer widths are not generic and have been informed by both the results of surveys and through consultation with stakeholders. Where key areas of bat activity, in particular *Myotis* activity, have been identified, specific measures have been embedded into the design of the Proposed Development detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. This includes the removal of Solar PV modules from a number of fields, including: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor

Reference	Theme	Matter raised	Response
			between Sheephouse Wood, Shrub's Wood and Decoypond Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane. • Field D27, adjacent to the eastern edge of Runts Wood. • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI (known to support breeding colonies of Bechstein's bats and other bat species). Instead, these areas would be used to provide mitigation for bats including increased foraging resources, woodland edge habitat and connectivity. Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood. Perimeter fencing surrounding the Solar PV development would be offset at least 15m either side from centre line of existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow between Sheephouse Wood, Shrubs

Reference	Theme	Matter raised	Response
			Wood and Decoypond Wood to reduce potential displacement effects. Perimeter fencing surrounding the Solar PV development would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity were recorded. Early planting and habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of Fields D30, D29 and D28, and hedgerows along boundary of Fields D30, D34 and D37) ahead of construction activities starting. This strategic planting is proposed to improve foraging and commuting habitat for bats between woodland blocks; and improve connectivity across the Site and to the wider landscape. In addition, a Collector Compound has been removed from Field B10 since Phase Two Consultation which was proposed to be located adjacent to Sheephouse Wood (see **Outline LEMP [EN010158/APP/7.6]** [**APP-142**]).
RR-026	Offsets	Comment that there should be a minimum of 50m between ancient woodland and development in line with the Vale of Aylesbury Local Plan (VALP) Policy NE8, as	The embedded mitigation detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [**APP-050**] and secured by the **Outline LEMP [EN010158/APP/7.6]** [**APP-142**] includes a minimum 30m offset from all ancient woodland which exceeds Natural England and Forestry Commission

Reference	Theme	Matter raised	Response
		opposed to the 30m currently provided.	standing advice of 15m offsets to protect the ancient woodland sites. The 30m buffer is considered a substantial distance in which habitat creation is proposed to provide suitable commuting and foraging routes for bats, maintaining links between existing woodland blocks and providing connectivity to the wider landscape. The paired static detector surveys (see **ES Volume 4, Appendix 7.16: Paired Static Bat Detector Survey Report (2025) [EN010158/APP/6.4] [APP-102]**) indicate the importance of the hedgerow resource to the bat assemblage, including both foraging and commuting Bechstein's bat and barbastelle bat. Surveys undertaken by Natural England indicate the importance of the woodland resource for Bechstein's bat. This provides confidence that the 30m buffer from ancient woodland mitigation would be effective and that a 50m would not be required. As detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**, following the application of additional mitigation measures, no direct or indirect adverse impacts are predicted on ancient woodlands within or adjacent to the Order Limits through the lifetime of the Proposed Development. Design Commitment C1 in **Design Commitments [EN010158/APP/5.9.2] [AS-018]** secures that perimeter fencing surrounding the Solar PV development would be

Reference	Theme	Matter raised	Response
			offset at least 30m from existing ancient woodlands while Design Commitment D3 confirms that such perimeter fencing would comprise timber post and wire-mesh 'deer-proof fencing'. While not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodlands, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in the VALP. Furthermore, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance [3] makes clear that "for ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage." Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.
RR-026	Use of buffer zones	Concern that access tracks would be located within the buffer zones within the Proposed Development, which should be secured for	The design of the Proposed Development has striven to ensure access tracks would not impinge on buffers, as demonstrated on the **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]**. As set out in

[3] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions UK Governmet guidance available online accessed 26/01/2026 Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

Reference	Theme	Matter raised	Response
		ecological protection and enhancement only and not used for movement of vehicles.	the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** design commitments C3, C4, C7 and D1 are all intended to have the effect that the access track would not enter the buffers unless a hedgerow crossing or a ditch or ordinary watercourse crossing is required.
RR-026	Fencing	Request for mammal passes to be designed into the fencing strategy rather than the current assumption that as fencing would not be buried, mammals would push under the fencing at low points.	There is already a commitment within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** for the provision of badger gates if required. The exact location of gates would be dictated by the pre-construction surveys. However, based on experience of solar farms in the Bristol vale it's apparent that muntjac, hares and badgers do push under the fence, often adjacent to carefully sited gates.
RR-026	Biodiversity Net Gain	Comment that the Applicant has complied with trading rules changing the baseline habitat type from 'arable field margins game bird mix' to 'other neutral grassland' in poor condition which will require further study.	The Applicant notes this. The use of Other neutral grassland in place of Arable field margin tussocky is appropriate as the habitats have the same distinctiveness score and generate the same number of units. This is discussed further in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]**.
RR-026	Arboricultural Impact Assessment	Comments on the Arboricultural Impact Assessment (AIA) (**ES Volume 4 Appendix 7.13 [EN010158/APP/6.4] [APP-099]**) including:	For discussion in relation to VALP Policy NE8 please see detailed response above. The AIA has been prepared in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction. This approach is fully consistent with

Reference	Theme	Matter raised	Response
		• That it is not compliant with national (NPPF) or local (VALP Policy NE8) policy. • That it relies on drone surveys instead of BS5837 compliant topographical data which results in an unreliable baseline. • That the AIA should be fully revised based on accurate ground-derived data. • That a revised Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) should be produced ensuring protection measures and construction methodologies reflect accurate tree positions and constraints based on the corrected baseline.	Planning Practice Guidance on implementing the NPPF, which expects tree impacts to be assessed using proportionate, recognised good practice. The Applicant would welcome clarification of the precise policy wording relied upon to support the statement that the AIA is not compliant with the NPPF and the alleged gap in the assessment, so that this can be considered and, where necessary, further clarified in the Examination. The current British Standard (BS 5837:2012) distinguishes woodland from groups but does not explicitly require the use of any particular suffix (such as "W") to define woodland parcels. The existing data table (Annex A) within **[APP-099]** already notes which groups are woodland parcels and which are ancient semi-natural woodland, so these areas are readily identifiable both on the plans (by their extent) and within the schedule. While aerial (drone) survey information was used, it did not replace BS 5837-compliant ground-based assessment. By using a high density of ground control points, the drone survey delivers survey-grade mapping with an accuracy of 6 cm (XY) and 9 cm (Z), producing high-resolution orthomosaics and digital surface models suitable for detailed constraints analysis. For the Proposed Development, this provides a far finer data resolution (around 3 cm/pixel) than a typical ground topographical survey (often 5–10 m between points), the

Reference	Theme	Matter raised	Response
			drone survey offers a robust and reliable baseline for the arboricultural assessment. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** secures the need for a site specific Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to be produced which will detail the exact location and nature of protective fencing, tree pruning, signage, methods of work and protection measures.
RR-026	Arboriculture	Comment that there should be safeguards for hedgerows with 10-metre buffers and future crown spread modelling. Comment that trees growing in and/or alongside hedgerows are likely to impact adjacent solar panels over time, creating pressure for tree reduction/felling, leading to a loss of trees and decline in hedgerow quality.	The **Outline LEMP [EN010158/APP/7.6] [APP-142]** already provides a commitment to a minimum 10m buffer between hedgerows and the security fence, and a further 5m from the security fence to the edge of the Solar PV panels. Furthermore, these trees already form part of actively managed agricultural boundaries confirming post development pressure would not significantly change in relation to tree management. Any localised shading that may occur can be managed through sensitive pruning in line with British Standard 3998 Tree work – Recommendations, rather than creating an unavoidable need for significant tree reduction or felling.
RR-026	Arboriculture	Comment that for veteran and potentially veteran trees enhanced buffers should be proposed with an appropriate management plan in	The Applicant recognises that veteran and potential veteran trees are irreplaceable features that warrant enhanced protection beyond standard British Standard 5837 buffers. In developing the current layout, these trees have already been treated as primary constraints and set back from proposed Solar PV development in line

Reference	Theme	Matter raised	Response
		line with standing advice and best practice.	with the current guidance from Natural England and the Forestry Commission. No veteran trees would be removed, with mitigation measures to protect these trees detailed and secured within the **Outline CEMP [EN010158/APP/7.2]** [APP-138].
RR-026	Arboriculture	Request to strengthen requirements in the **draft DCO [EN010158/APP/3.1]** [APP-013] to provide for a detailed Arboricultural Method Statement and Tree Protection Plan being approved and implemented prior to commencement of any works (including 'preliminary works' which could affect trees, hedgerows or woodland).	The **Outline CEMP [EN010158/APP/7.2]** [APP-138] secures the need for a site specific Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to be produced which would detail the exact location and nature of protective fencing, tree pruning, signage, methods of work and protection measures. The commitments in the Outline CEMP are secured via Requirement 11 of the **draft DCO [EN010158/APP/3.1.2]** [AS-010]. Prior to commencement of construction including preliminary works which could affect trees, hedgerows or woodland, the Applicant would submit the detailed Construction Environmental Management Plan to Buckinghamshire Council for approval to discharge this requirement, which would include further detail on the AMS and TPP.
RR-026	Arboriculture	Comment that rare black poplar and traditional orchard habitats have not been assessed, including genetic testing.	The group of trees with potential to be black poplar are entirely unaffected by the Proposed Development and therefore, assessment is not considered to be required. DNA testing to confirm the presence of native black poplar (Populus nigra subsp.betulifolia) is a specialist process that requires laboratory analysis and falls outside

Reference	Theme	Matter raised	Response
			the scope of standard baseline arboricultural survey requirements. The Applicant does not agree that traditional orchard habitat has been "failed" in the assessment. The plantation/orchard at the north-western end of the site has been identified and described as being in generally poor condition, with many trees in visible decline. However, this feature lies well outside the footprint of any proposed development works, at a separation distance of approximately 260m from the nearest works. Given this stand-off, there is no realistic pathway for direct or indirect arboricultural impact (for example from construction access, ground disturbance or shading), and the orchard would remain physically unaffected by the Proposed Development. On that basis, the AIA appropriately treats the orchard as part of the wider baseline rather than as a constraint requiring specific mitigation.
RR-026	Arboriculture	Request to provide a quantified assessment of the cumulative effect of loss of arboricultural features.	British Standard 5837 assessments are, by design, scheme-specific, and the quantification of cumulative effects across multiple developments is addressed at Environmental Statement level (for example, within the cumulative landscape, biodiversity and land-use assessments), rather than by attempting to merge disparate datasets from other projects.

Reference	Theme	Matter raised	Response
			For the Proposed Development, arboricultural losses have been quantified and are clearly reported within the AIA. For other schemes, compatible survey information (tree categories, RPAs, precise removals) is generally not available in a form that would allow a robust combined numerical total and attempting one would risk being misleading. The Applicant therefore considers the current approach proportionate and consistent with EIA practice, while still allowing the Examining Authority to understand the contribution of the Proposed Development to any wider pattern of change in tree, hedgerow and woodland cover.
RR-026	General comment	Comment that the Proposed Development would have an industrialising effect on a rural landscape and the landscape effects are not justified, with particular reference to areas of raised elevation, areas nearby to existing rural villages like Botolph Claydon, and the Aylesbury Vale Area of Attractive Landscape. Request for the Applicant to address landscape impacts, including the proposed mitigation with reference to the LCA and the	The Applicant recognises the concerns regarding landscape change but does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development. An assessment to determine the likely significant effects on landscape and visual amenity is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill.

Reference	Theme	Matter raised	Response
		report 'Defining the special qualities of local landscape designations in the Aylesbury Vale District' (2016).	It is acknowledged that the character and appearance of the landscape within the Order Limits would therefore change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules, Satellite and Main Collector Compounds, BESS, Rosefield Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The extent of manufactured metallic and glass structures introduced into the landscape will be more than exists in the landscape at present, but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings. The relevant extracts from local landscape character studies (LCT/LCA), including the special qualities of the Quainton-Wing Hills Area of Attractive Landscape (as identified in '*Defining the special qualities of local landscape designations in the Aylesbury Vale District'*) are presented in **ES Volume 4, Appendix 10.2: Rosefield Extracts from Published LCA [EN010158/APP/6.4] [APP-111]**. As set out in the **Design Approach Document [EN010158/APP/5.9] [APP-038]** this information has been used to inform the approach to good design. The assessment includes

Reference	Theme	Matter raised	Response
			evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors, through new hedgerow and tree planting and the sowing of wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site as secured in the **Outline LEMP [EN010158/APP/7.6] [APP-142]**.
RR-026	Fields B28 and B29	Request for Fields B28 and B29 to be removed from proposed solar PV development and the BESS relocated due to the industrialising effect of infrastructure within the Aylesbury Vale Area of Attractive Landscape.	This is understood to be a request for the removal of Solar PV modules from Fields **D28** and **D29** which are located to the small flat ridge to LCA 9.1: Finemere Hill, which itself forms a small part of the Quainton-Wing Hills Area of Attractive Landscape (as set out in '*Defining the special qualities of local landscape designations in the Aylesbury Vale District'* presented in **ES Volume 4, Appendix 10.2: Rosefield Extracts from Published LCA [EN010158/APP/6.4] [APP-111]**). **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation over a localised extent (primarily Fields D28 and D29) of LCA 9.1: Finemere Hill (paragraphs 10.10.433 to 10.10.446). These limited effects would not however, amount to a significant effect on the wider Quainton-Wing Hills Area of Attractive Landscape.

Reference	Theme	Matter raised	Response
			Whilst it is acknowledged that there would be some indirect effects on Quainton-Wing Hills Area of Attractive Landscape as a result of the development of the BESS in Fields D8 and D9, such effects would be indirect and not significant. The Applicant has undertaken a thorough site selection and design development process as detailed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** and **Design Approach Document [EN010158/APP/5.8] [APP-038].** Factors such as the proximity to Sion Hill Farm, offset requirements from overhead lines and pylons and presence of areas of higher flood risk led to the discounting of fields in Parcel 3 suitable for the BESS. Section 10 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** concludes with a consideration of the Planning Balance and justifies how the urgent need for an unprecedented capacity of new solar generation, as demonstrated in the **Statement of Need [EN010158/APP/5.6] [APP-036]** outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited. In this regard, the Proposed Development is fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target by seeking to deliver a substantial benefits from the available land and grid

Reference	Theme	Matter raised	Response
			connection. Removing fields would reduce the benefits arising from the Proposed Development.
RR-026	Design of the Proposed Development	Comment that the design of the Proposed Development has exacerbated its visual impacts, including introduction of a noise barrier and higher solar panels to avoid flood areas within the Proposed Development contrary to VALP NE4.	The Applicant maintains that the mitigation proposals as presented in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** are appropriate. In both specific examples raised in the response, the noise barrier and higher solar panels are located in low lying areas of the Order Limits with proposed mitigation hedgerow planting. The assessment of landscape and visual effects presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** takes into account the location of noise barriers and higher solar panels and reports the likely significant effects.
RR-026	Impact on PRoW	Concern that PRoWs are particularly sensitive to landscape and visual amenity impacts and these have been underestimated by the Applicant, with reference made to other sensory impacts on PRoW users such as noise of the BESS, and that such effects do not protect and enhance public rights of way (NPPF, para 105).	An explanation of how sensitivity has been determined is provided in **ES Volume 4, Appendix 10.1: LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]**. Sensitivity (described as 'high', 'medium' or 'low') is judged by combining component judgements about the value and susceptibility of the receptor, as illustrated in Table A10.2. Detailed visual susceptibility and value criteria are set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. All PRoW users have been described as high susceptibility visual receptors which is the highest level of susceptibility. When combined with the value of the view, all PRoW users

Reference	Theme	Matter raised	Response
			have been described as being of high/medium visual sensitivity. As set out in the **ES Volume 4, Appendix 10.1: LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]**, only users of PRoW within National Landscapes are described as being of overall high sensitivity; there are no National Landscapes within the study area. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** considers the impacts on the users of PRoW. The assessment concludes that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PRoWs between Botolph Claydon and Runts Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runts Wood); PRoW between East Claydon Road and Parcel 3; and Swan's Way/Outer Aylesbury Ring. It is noted that no noise effects are identified as being significant within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]** and it is therefore considered that any such non-significant effects would not add further to the judgement of high susceptibility afforded to users of PRoW. The Applicant therefore maintains that such 'sensory impacts' have

Reference	Theme	Matter raised	Response
			been considered in both the assessment and mitigation of effects on PRoW users.
RR-026	Mitigation measures	Comment that proposed mitigation measures are generic and too small to minimise harms, and the Applicant should explore opportunities to soften the Proposed Development through additional hedgerow planting, utilisation of strategically placed tree belts and the undulating topography of the site.	Proposed embedded mitigation is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] and associated figures in **ES Volume 3 [EN010158/APP/6.3]** [APP-069]. This includes reference to the method by which the embedded mitigation is secured, which is generally the **Outline LEMP [EN010158/APP/7.6]** [APP-142] or the **Design Commitments [EN010158/APP/5.9.2]** [AS-018] 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]** [APP-038] 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'. The mitigation proposals respond directly to specific guidelines in the Aylesbury Vale Landscape Character Assessment and are based on robust baseline surveys

Reference	Theme	Matter raised	Response
			tailored to local landscape and visual receptors and consultations with relevant consultation bodies. The proposed extensive new hedgerow and structural planting would be planted in accordance with **Outline LEMP, Appendix 1: Green and Blue Infrastructure Parameters [EN010158/APP/7.6]** [APP-142]. The total length of new structural hedgerow (approximately 4,336 linear metres) and structural woodland planting (approximately 8.78 ha) proposed within the Order Limits would far exceed the amount removed during construction. Nevertheless, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] reports that there would be a number of significant adverse landscape and visual effects. It is acknowledged that residual effects cannot always be mitigated and such effects will be weighed in the planning balance.
RR-026	Cumulative effects	Comment that the Proposed Development in combination with other projects in the area (including surrounding solar farms, prison and other NSIP railway projects) imposes unacceptable kinetic and sequential cumulative landscape character impacts across the district which must weigh against	An assessment of the inter-project cumulative effects, including sequential effects, with other existing and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060] and **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4]** [APP-135]. There is potential for an increase in significant effects as a result of combined effects on Landscape Character Area 9.2:

Reference	Theme	Matter raised	Response
		the Proposed Development in the decision-making process and go beyond expected landscape and visual amenity harms as acknowledged in the NPSs. Comment that as such the Proposed Development departs from the starting point for Critical National Priority Infrastructure in NPS EN-1 and assessment of the impacts of the Proposed Development must take into account the impact of other developments.	Quainton Hill and Station House during operation (including maintenance) (Year 1 and Year 10); on the residents of Granborough during construction, operation (including maintenance) (Year 1); and for significant effects to extend for the full duration of operation from the North Buckinghamshire Way and The Midshires Way. Of these significant cumulative effects, only those for the North Buckinghamshire Way and The Midshires Way would be sequential. It is considered that these cumulative effects would extend to a defined area, no more than approximately 2km beyond the Order Limits to the southeast of Parcel 2, which would not amount to '*impacts across the district*'. The Applicant therefore maintains that the potential cumulative impacts are not atypical considering the scale of the Proposed Development. Paragraph 4.1.7 of NPS EN-1 (2024) sets out that: 'For projects which qualify as CNP infrastructure, it is likely that the need case will outweigh residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or

Reference	Theme	Matter raised	Response
			onshore to flood and coastal erosion risk'. The Applicant does not consider that the residual effects on landscape and visual are an exceptional case so as to depart from being CNP, and the Proposed Development does not present an unacceptable risk to or interference with any of the listed matters. As such, the Proposed Development does benefit from being CNP infrastructure.
RR-026	LVIA	Comments on the landscape and visual assessment, including: • That there should be a site-specific LVIA with an indicative worst case and winter views • That the sensitivity values for various character areas appear low and these should be robustly checked • That sensitivity values for users of recreational routes (including public rights of way) should be measured as high sensitivity. • That comprehensive tree surveys and impacts on trees have not been addressed and therefore the LVIA is flawed.	• A site specific LVIA is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and has considered the maximum parameters for each element of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and **Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]**; the removal of all vegetation shown in **Appendix 3: Vegetation Removal Parameters** of the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and winter views as a basis for photomontages as illustrated by the visualisations in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] [APP-117] [APP-118]**. • A detailed assessment of landscape sensitivity is provided for each landscape character area in **ES Volume 4, Appendix 10.3: Rosefield Landscape**

Reference	Theme	Matter raised	Response
			Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]. • As described above in response to 'Impact on PRoW' all recreation routes have been assessed as of high/medium sensitivity. The exception to this are users of the National Cycle Network assessed as of high sensitivity. • A comprehensive tree survey is provided in **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4] [APP-099]**.
RR-026	Heritage assets	Disagreement with the approach to scope out individual assessment of listed buildings within conservation areas as the two designations have specific and separate policy tests, with this approach giving insufficient weight to impact and harm being given to listed buildings.	The list of assets scoped into the Environmental Statement was agreed with Buckinghamshire Council's built heritage advisor as noted in Table 9.1 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]**. All assets scoped in (including listed buildings within conservation areas) have been assessed individually within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** where intervisibility or in combination views of the Proposed Development are predicted by the Zone of Theoretic Visibility (ZTV). All listed buildings within conservation areas were also assessed individually within the stage 1 setting assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting**

Reference	Theme	Matter raised	Response
			Assessment [EN010158/APP/6.4] [APP-106]) and for those where potential significant effects were identified more detailed assessment was carried out within **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**.
RR-026	Approach to assessment	Comment that that the approach to assessment reduces the significance of effect for grade II listed buildings identified as being of medium importance with major magnitude impacts, as the significance of effect table states that this can cause moderate or large effect. Statement that a moderate effect would be inappropriate for a grade II listed building suffering a major impact.	As noted within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]**, where the matrix allows for two potential options for significance of effect professional judgement is used with reference to where on the scale of magnitude the impact is considered to lie – impacts closer to the threshold for lower or higher magnitudes of impact may result in lesser or greater significance of effect as a result. The assessment methodology notes that moderate effects are significant, this applies regardless of the importance of the asset. The Applicant maintains its position regarding the assessment of impacts which is evidenced within the detailed setting assessment at **Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**. No major magnitude impacts have been identified to any designated heritage assets, the only major impact identified within the assessment is the precautionary assessment of physical

Reference	Theme	Matter raised	Response
			impacts to currently unknown below ground archaeological remains.
RR-026	Setting of heritage assets	Comment that the Proposed Development would impact the rural setting of heritage assets by industrialising the landscape, with consideration of cumulative effects of the Proposed Development with the number of other solar and large-scale infrastructure projects in the local area. Specific reference made to Botolph Claydon Conservation Area, East Claydon village, Claydon RPG and listed buildings such as Pond Farmhouse where setting impacts on heritage assets are underassessed, with some contributory qualities not identified.	The impacts on heritage significance resulting from changes to the rural qualities of the setting of heritage assets have been considered within the detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106]). This has included consideration of the contribution that the current agricultural use makes to the significance of the heritage assets, and other contributory qualities such as tranquillity which are acknowledged to be altered during construction and decommissioning phases. It has considered approaches to and between as well as static views of and from the assets. The Applicant recognises the concerns regarding the impact on rural setting and has undertaken a detailed landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053]. It is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale solar PV development. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site and, notwithstanding

Reference	Theme	Matter raised	Response
			some significant landscape and visual effects, the Applicant does not consider that these changes would result in the industrialisation of the countryside. Cumulative effects have been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. The assessment of effects on Botolph Claydon Conservation Area and Claydon Registered Park and Gardens have been agreed with Historic England as detailed within its **Relevant Representation [RR-109]**.
RR-026	Location of the BESS	Comment that the location of the proposed BESS compound locations (Fields D8 and D9) have the potential to cause heritage harms to the Botolph Claydon Conservation Area and East Claydon village above those reported in the ES. Suggested relocation to Field SA59 would mitigate some harm if designed to avoid other listed buildings in this area.	The potential impacts on Botolph Claydon Conservation Area and East Claydon village and the listed buildings within both of these areas have been considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]**. The Applicant has concluded that the harm to significance would be less than substantial and that the effects would be not significant. Field SA59 is one of six fields where the Order Limits was extended to the west of the existing National Grid East Claydon Substation prior to Phase Two Consultation, to facilitate the Grid Connection Cable Corridor. The assessment has been based on the assumption that some, or part, of the new National Grid East Claydon

Reference	Theme	Matter raised	Response
			Substation could be located within this field thus precluding the consideration of BESS development.
RR-026	Draft Archaeology Management Strategy	Comments on the **Draft Archaeology Management Strategy [EN010158/APP/7.10]** [APP-146] including: • Clarification that all archaeological field work would be completed prior to construction work in the relevant area should be provided. • Concern about coverage of trial trenching which should be 4% of areas of infrastructure or where geophysical survey indicated potential archaeological sites, and 2% otherwise. • Requested provision for the Council's Historic Environment Record to be supplied with copies of all of the trial trenching reports which have been approved by Buckinghamshire Council and Historic England in hard and digital format.	The Applicant welcomes ongoing engagement with the Buckinghamshire Council archaeological advisor and will provide clarification on the timing of the archaeological fieldwork, within an updated Draft Archaeological Management Strategy to be submitted by Deadline 1. This updated document will also include provisions: that the HER will be supplied with copies of all approved trial trenching reports; that methodologies for preservation in situ will be agreed with Buckinghamshire Council; for public engagement (the scope of which will be agreed with Buckinghamshire Council at each stage of work); and that methodologies for decommissioning will be agreed with Buckinghamshire Council and Historic England. The CEMP and DEMP will also be updated to include the archaeological mitigation. The Applicant is concerned by the request for blanket percentage trial trenching coverages, which does not accord with the emerging best practice guidance published by CIFA, FAME, ALGAO and Historic England in 2025. The Applicant considers that a more bespoke approach to evaluation for the detailed design stage – similar to that which was agreed with Historic England and Lincolnshire County Council for Springwell Solar Farm – where site specific research questions determine

Reference	Theme	Matter raised	Response
		• Requested provision for methodologies for preserving archaeology in situ to be demonstrated to be appropriate and agreed with Buckinghamshire Council and Historic England. • Requested provision for public engagement including podcasting, local community presentations, field visits and participation in excavations. • Request for provision for methodologies for decommissioning to be agreed with Buckinghamshire Council and Historic England, with the presence, significance and vulnerability of heritage assets made clear in the OEMP and DEMP.	the scope of further evaluation to inform the detailed design, would be more appropriate.
RR-026	Approach to assessment	Comments that the Environmental Statement and accompanying materials do not present a clear, integrated assessment of the likely significant effects on population	The Applicant considers that the approach taken within the Environmental Statement to consider health and wellbeing effects is in compliance with the EIA Regulations (2017).

Reference	Theme	Matter raised	Response
		and human health, including indirect and cumulative effects: • Health related information is dispersed across technical chapters of the ES and then summarised qualitatively, rather than assessed through a health lens making it difficult to support conclusions of overall significance of health effects for defined populations. • That the approach does not follow EIA Regulations and latest ISEP guidance. • The ES has not followed the latest guidance from former IEMA (now ISEP). This undermines confidence that impacts, and their significance have been correctly identified. • Request for a standalone Population and Human Health chapter within the ES which follows a determinants-pathways-receptor groups approach supported by	The Applicant is also content that the approach accords with the EIA Scoping Opinion (see **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [APP-080]** (Item 2.3.6)), which states that: "*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, Noise and Vibration, Traffic and Access and Population; and in the standalone glint and glare assessment. The Inspectorate is content with this approach…*" The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. It is noted that the EIA Scoping Opinion goes on to say: a) "*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*"; and b) "*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*".

Reference	Theme	Matter raised	Response
		demographic analysis, health specific significance criteria, explicit consideration of health inequalities and commentary on how proposed mitigation and enhancements relate to local health outcomes.	To this end, the Applicant has also produced **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**. That document: a) Addresses the concern about dispersal of effects across the ES, providing a comprehensive and accessible single summary of all health and wellbeing considerations with clear cross-references; b) Draws on and has regard to IEMA Guidance referenced by the Council (noting that ISEP Guidance was not published at the point of submission), which is important to ensure transparency in the approach to identification of receptors and sensitivity, and to consider environmental effects directly through a health lens; and c) Follows a determinants-pathways-receptor groups approach supported by demographic analysis, health specific significance criteria, explicit consideration of health inequalities and commentary on how proposed mitigation and enhancements relate to local health outcomes. In response to Buckinghamshire Council's concern on the level of assessment undertaken in relation to health, the Applicant will provide a separate report which will draw together the health information already submitted within the DCO Application and clearly articulate the approach

Reference	Theme	Matter raised	Response
			taken to derive the significance of health effects. This will draw on standard guidance produced by Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP)) as is referred to in the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083].** This report will be submitted into examination at Deadline 1.
RR-026	Assessment of human health (air quality)	Comment that **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** frames health narrowly e.g. meeting statutory thresholds for NO_2, PM_{10} and $PM_{2.5}$ and managing construction dust risk but does not address broader wellbeing outcomes (such as stress, perceived risk, or cumulative exposure alongside other environmental stressors), and sensitivity is defined by proximity and receptor type rather than by demographic characteristics or health vulnerability.	The Applicant notes that Paragraph 4.4.7 of the National Policy Statement for Energy (EN-1) (2024) states that "*Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008*" Health has not been framed narrowly in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]**. The assessment follows the standard approach to applying health-related thresholds to concentrations and distribution of specific emissions as dictated by policy and legislation. It is recognised that there may be some indirect health pathways relating to stress, perceived risk,

Reference	Theme	Matter raised	Response
		Comment that while monitoring and complaints logging are mentioned, there is no commitment to transparent communication of monitoring data to affected communities.	or cumulative exposure alongside other environmental stressors which are not directly related to the air quality assessment methodology, but have been accounted for through **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** (described below). As such, the scope of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** takes account of inherent thresholds linked to health outcomes. The approach taken is compliant with the **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]** in this regard. Air Quality Standards applied in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** are standard practice, legally mandated limits placed on the concentrations of specific air pollutants in the ambient air, specifically designed to protect public health and welfare. These standards represent the maximum level of pollution deemed acceptable, based on extensive scientific research on the health effects of various pollutants. The approach taken to defining sensitivity in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** is standard practice, dictated by legislative and policy thresholds. The sensitivity criteria used within **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** specifically references the duration of

Reference	Theme	Matter raised	Response
			exposure as well as the type of receptor including demographic characteristics, whereby (for example) schools and elderly care homes are given a higher sensitivity rating. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** summarises the assessment at **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** at Section 3.3, and frames this in terms of relevant health pathways/determinants & sensitivities of populations/sub-populations, considering in turn construction and operational (including maintenance) effects and the significance of those effects in relation to IEMA guidance, and then summarising the approach to mitigation. An additional assessment within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** applies sensitivity criteria through a health lens, noting that vulnerable sub-populations are influenced by demographic characteristics, including age. Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** provides specific commentary on mental health and wellbeing, including perceptions of effect and stress related to environmental change.

Reference	Theme	Matter raised	Response
			Effects relating to the in-combination environmental impacts as such as they relate to health determinants and pathways are considered at Section 4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]** [APP-083]. **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** [APP-049] and the **Outline CEMP [EN010158/APP/7.2]** [APP-138] commit to monitoring and complaints logging in regards to dust and air quality. A Dust Management Plan will be prepared as part of the detailed CEMP(s) prior to construction of the Proposed Development. Furthermore the Applicant proposes to update the **Outline CEMP [EN010158/APP/7.2]** [APP-138] at Deadline 1 to commit to producing and sharing dust monitoring reports on a three monthly basis.
RR-026	Assessment of human health (landscape and visual)	Comment that discussions of impacts on tranquillity in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] remains landscape focused and should be translated into population level mental health outcomes or proposing monitoring linked to wellbeing indicators.	**ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4]** [APP-083] summarises the assessment at **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] at Section 3.5, and frames this in terms of relevant health pathways/determinants & sensitivities of populations/sub-populations, considering in turn construction and operational (including maintenance) effects and the significance of those effects in relation to IEMA guidance, and then summarising the approach to mitigation.

Reference	Theme	Matter raised	Response
			Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** provides specific commentary on mental health and wellbeing, including perceptions of effect and stress related to environmental change. The Applicant notes that assigning an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective interpretation of the landscape as a whole, and of individual views by an individual and collective set of receptors (if considered at the population scale). Notwithstanding this, there are multiple receptors which would contribute to recreation and perception of landscape which would experience significant adverse effects. The Applicant has sought to provide embedded and additional mitigation to reduce the significance of adverse effects as far as is reasonably practicable – this is described within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** (paragraphs 3.5.24 to 3.5.27).
RR-026	Assessment of human health (noise and vibration)	Comment that the wider wellbeing pathways, annoyance, chronic stress, in combination effects with air quality and visual change, are not developed in **ES Volume 2,**	Section 3.4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** summarises the assessment within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**, and frames this in

Reference	Theme	Matter raised	Response
		Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056] and PRoW users are treated as transitory with no narrative on amenity loss or recreational experience.	terms of relevant health pathways/determinants & sensitivities of populations/sub-populations, considering in turn construction and operational (including maintenance) effects and the significance of those effects in relation to IEMA guidance, and then summarising the approach to mitigation. Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** provides specific commentary on mental health and wellbeing, including perceptions of effect and stress related to environmental change. It could be expected that users of PRoW within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre-construction ambient noise levels. However the construction activities affecting an individual route would often be localised, and the transitory nature of PRoW users would mean that they are not exposed to construction noise for an extended period. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** acknowledges at paragraph 4.2.9 that "*engagement and consultation has resulted in the understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the*

Reference	Theme	Matter raised	Response
			construction and operational (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing." Amenity and recreational experience would be temporarily and intermittently changed, though not to a significant level in terms of noise thresholds, which inherently include a consideration of the relationship between noise and health. The Applicant has sought to provide embedded and additional mitigation to reduce the significance of adverse effects as far as is reasonably practicable – this is described within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** (paragraphs 3.4.17 to 3.4.20).
RR-026	Assessment of human health (population and socio-economics)	Comment that **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** should include: age/gender/ethnicity breakdowns, assessment of vulnerable populations beyond area level deprivation, assessment of health service capacity/ emergency access, and analysis of PRoW	The baseline reported within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** does not include age, gender or ethnicity as these indicators are not relevant to the assessment of effects in the chapter, which explicitly (paragraph 14.1.2) does not consider health effects. Such characteristics and Protected Characteristics are considered within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** and Section 4 of the

Reference	Theme	Matter raised	Response
		impacts centred on amenity, inclusivity and safety as health determinants.	**Equality Impact Assessment [EN010158/APP/7.12] [APP-148]**. Paragraphs 14.6.57 to 14.6.59 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** make it clear that the assessment of effects on walkers, cyclists and horse riders (WCH) within that chapter are distinct from those considered by other chapters (**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053] and Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056].** However, **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** notes that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operational (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing, and therefore the health-specific in-combination effects on PRoW users has been considered in one dedicated place at Section 4.2 of **ES Volume 4, Appendix 5.5:**

Reference	Theme	Matter raised	Response
			Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]. Effects on primary health services from a non-local workforce were not scoped into **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**, however paragraph 14.8.45 notes that the peak number of workers anticipated to be on-site at any one time during the construction phase is 600, of which approximately 6% (approximately 36) are anticipated to stay in temporary accommodation based on regional averages for the construction industry. This would not represent a substantial additional demand on public services, noting that even this low number would not be fully 'net additional' given their propensity to stay temporarily in the area during working patterns and return home between shifts, to their permanent accommodation where they would contribute to public services through general taxation.
RR-026	Suitability of local road network	Comment that the Proposed Development is located in an area reliant on local roads which are not designed for heavy construction traffic.	The Applicant has carefully considered and fully assessed the potential impacts of the Proposed Development on the local road network. Full details are provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. Following the implementation of mitigation measures (detailed in the **Outline Construction Traffic Management Plan**

Reference	Theme	Matter raised	Response
			[EN010158/APP/7.5] **[APP-141]**), the local road network is considered suitable for HGV traffic.
RR-026	Construction access	Agreement with the Applicant's preferred access route, subject to HS2 works not compromising the route through engagement during the construction phase.	The Applicant will continue to engage with stakeholders, including other major projects to help reduce potential impacts during the construction phase. An **Outline CTMP [EN010158/APP/7.5]** **[APP-141]** has been submitted as part of the Application, which has been informed and shaped by consultation and engagement. It also draws on experiences of other infrastructure projects to ensure that proposed measures are appropriate and efficient. This includes collaboration with other developments, with provision for the Principal Contractor to consult with the HS2 Transport Officer to coordinate haulage operations on the access routes during the construction period.
RR-026	Transport Assessment	Comment that **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** **[APP-131]** should include detailed access drawings, visibility splays, and swept path analysis for site entrances and internal crossings to confirm safe access for construction and operation. Additional request for gate and security feature locations to be provided.	Visibility splay and detailed junction layout details are provided for all junctions as part of the technical drawings provided in the **Outline CTMP [EN010158/APP/7.5]** **[APP-141]** Gate and security areas would be set back to ensure that construction traffic does not back up onto the public road.

Reference	Theme	Matter raised	Response
RR-026	Staff movements	Comment that numbers of staff arriving by minibus should be guaranteed with enforcement mechanisms provided, or a revised assessment should be undertaken assuming all staff drive to the Order Limits.	The **Outline CTMP [EN010158/APP/7.5] [APP-141]** includes provision for a Staff Travel Plan to be delivered as part of the detailed CTMP, which would set the mode shares. The detailed CTMP would be provided to the Principal Contractor and they would be required to abide by these regulations as part of their commercial contract with the Applicant. Failure to follow the traffic management measures proposed would be a non - compliance matter and could result in contractors being subject to penalties and individual sanctions. Failure to observe the CTMP would also be a breach of the DCO.
RR-026	Staff movements	Comment that the suggestion that trip generation may be averaged over a 12-hour day is unrealistic as staff arrivals and departures would peak at the start and end of the day, requiring a proper peak-hour profile which should be reflected in a Staff Travel Plan detailing how mode share targets would be achieved and enforced. Request for junction capacity assessments i.e. A41/Station Road to be undertaken using 2030 growth forecasts to ensure no adverse	The traffic impact of the Proposed Development is provided **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. The peak of the construction traffic flows would occur with staff arrivals prior to 7am and outside of traditional network peaks and as such peak junction assessments are not generally required. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** includes provision for a Staff Travel Plan to be delivered as part of the detailed CTMP, which would set the mode shares. The detailed CTMP would be provided to the Principal Contractor, and they would be required to abide by these regulations as part of their commercial contract with the Applicant. Failure to follow the traffic management

Reference	Theme	Matter raised	Response
		impacts on traffic flow, including bus services.	measures proposed would be a non -compliance matter and could result in contractors being subject to penalties and individual sanctions. Failure to observe the CTMP would also be a breach of the DCO.
RR-026	Monitoring	Agreement with proposed routing restrictions to prevent HGVs from passing through sensitive villages and request for more robust monitoring and reporting to ensure compliance.	This is noted, with the Applicant seeking to limit effects on communities from traffic wherever possible. This has involved identifying an access route that avoids local villages. These routes would be secured via the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** includes measures such as the formation of a Traffic Management Group, use of GPS trackers for regular HGV traffic, and the use of a visible vehicle identification system. Failure to follow the proposed measures would be a non-compliance matter and could result in contractors being subject to penalties and individual sanctions. The contract with the Principal Contractor would include a requirement for the CTMP to be included as a deliverable measure within the contract. A CTMP coordinator would be appointed on Site during the construction phase. The CTMP is a condition of the DCO and its measures are a requirement of this.
RR-026	Road widening	Comment that where physical road-widening works are proposed the Council will engage with the Applicant on whether these works	Plans illustrating the proposed road widening works are included in **Outline CTMP [EN010158/APP/7.5] [APP-141]**. These would be removed and the verge restored to its original condition, following the completion of

Reference	Theme	Matter raised	Response
		should be permanent or temporary. If Snake Lane improvements are not delivered, the Applicant must undertake full reconstruction rather than providing funds for the Council to manage.	construction works. The **Draft DCO [EN010158/APP/3.1.2] [AS-010]** outlines how road improvements and their potential removal following construction would be controlled and approved. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** notes the current poor condition of Snake Lane/Fidlers Field and the requirement for reconstruction work. Should the road be in its current condition (or worse) when the Proposed Development is scheduled to begin construction, the Applicant would agree to undertake or fund road improvements. This would be agreed with the local highways authority.
RR-026	Closure of PRoW	Agreement with the commitment in the **Outline Rights of Way Access Strategy [EN010158/APP/7.8] [APP-144]** to limit temporary closures to a maximum of six months per route, but to protect amenity reinstatement of surfaces to at least their original condition after cable installation is essential and this should be clearly addressed in the Strategy.	The Applicant thanks Buckinghamshire Council for its agreement to the commitment to limit temporary closures to a maximum of six months per route. It is the intention that temporarily diverted PRoW would be reinstated to at least their original condition post construction. Details such as surfacing of routes would be discussed with and approved by Buckinghamshire Council to create an appropriate high-quality network. This will be clarified in the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8] [APP-144]** at Deadline 1.

Reference	Theme	Matter raised	Response
RR-026	Proposed diversion	Agreement in principle to permanent diversions proposed for ECL/4/2 and ECL/7/2, subject to a 2m width which must be recorded for these routes. Disagreement with proposed diversions to SCL/12 and SCL/13 which would create an unacceptable dead-end at Ponds Farm and this should be re-aligned to maintain connectivity with recording of widths and use of acceptable gates.	The Applicant thanks Buckinghamshire Council for its in principle agreement to the permanent diversions proposed for ECL/4/2 and ECL/7/2. The **Outline RoWAS [EN010158/APP/7.8] [APP-144]** requires any new or diverted routes to be designed in accordance or with regard to design standards adopted by Buckinghamshire Council, and be approved by Buckinghamshire Council before they are implemented. Details such as route width and surfacing would be further assessed at the detailed design stage as a result and would be discussed with and approved by Buckinghamshire Council at that stage. The Applicant will reduce the length of PRoW SCL/12/2 that is stopped up, connecting the stretch of SCL/12/2 that runs through the Ponds Farm complex to the permanently diverted route to the west. This will maintain connectivity and prevent a dead end. This will be updated in the **Outline RoWAS [EN010158/APP/7.8] [APP-144]** at Deadline 1.
RR-026	New permissive paths	Suggestion that an additional permissive path linking Knowl Hill and Knowl Hill Farm is recommended to improve bridleway connectivity and reduce reliance on Three Points Lane during construction.	Creating an additional link to the proposed permissive route from the south and south east, to link to MCL/17/1 and/or MCL/18/1 at Knowlhill Farm, would require the route to cross land outside the main developable area and only required to be used by Applicant for cabling and/or construction and maintenance access. This area would be returned to agricultural use following construction, and the additional link is not considered

Reference	Theme	Matter raised	Response
			necessary to mitigate the effects of the Proposed Development. It is therefore not considered appropriate to provide this link.
RR-026	Three Points Lane	Comment that a segregated 3m-wide route behind the highway boundary hedge of Three Points Lane should be provided to protect walkers, cyclists, and horse riders during the 30-month construction period. In line with local (Buckinghamshire's Rights of Way Improvement Plan) and national (NPPF para 105) policy, as two construction depots on Three Points Lane would increase traffic on this narrow route.	Only a single construction compound is proposed on Three Points Lane. As indicated on **ES Volume 3, Figure 3.8.2: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.2] [AS-021]** and explained in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]**, the construction compounds indicated are indicative only and would be much smaller than the maximum suitable areas shown. Construction traffic would not travel along Three Points Lane. It would cross Three Points Lane between Fields SA12 and B23 (South) only, as indicated in **ES Volume 3, Figure 3.11: Indicative Location of Internal Access Tracks [EN010158/APP/6.3] [APP-063]**. The access point shown in **ES Volume 3, Figure 3.9: Indicative Construction and Operational Access [EN010158/APP/6.3] [APP-063]** into Field B20 would only be used during operation. It is therefore not considered necessary to provide a segregated route behind the highway boundary hedge.
RR-026	Proposed upgrades	Comment that an opportunity exists to upgrade Footpaths SCL/8/2 and QUA/41/1 to bridleway status to	The Applicant is not proposing to upgrade these footpaths to bridleways as it is not necessary to mitigate

Reference	Theme	Matter raised	Response
		close a gap in the network and delete the dead-end bridleway to Coppice Lowhill Farm.	the effects of the Proposed Development and does not reflect discussions with the landowner.
RR-026	Upgrades to existing footpaths	Comment that the removal of stiles within the Order Limits and replacement with BS 5709-compliant gates or gaps would significantly improve accessibility for mobility-impaired users, meeting Equality Act 2010 obligations and encouraging wider use.	This would be further assessed at the detailed design stage and at that time would be discussed with and approved by Buckinghamshire Council. The **Outline RoWAS [EN010158/APP/7.8] [APP-144]** requires any new or diverted routes to be designed in accordance or with regard to design standards adopted by Buckinghamshire Council, which would include in relation to stiles and gates, and be approved by Buckinghamshire Council in that regard before they are implemented. The **Outline LEMP [EN010158/APP/7.6] [APP-142]** also requires stiles and gates to be checked to ensure they are safe and operationally effective, which would include consideration of accessibility.
RR-026	Noise and vibration impacts	Comment that there is a need to ensure that noise emissions from the BESS do not exceed the thresholds set out in BS 4142:2014+A1:2019 and Planning Practice Guidance – Noise (below 40dB LAr during the day and 35dB LAr during night) at the nearest sensitive receptor.	The criteria of 40dB L_{Ar} daytime and 35dB L_{Ar} night-time at high sensitivity receptors is secured by Requirement 14 of the **Draft DCO [EN010158/APP/3.1.2]** [AS-010]. The requirement and specification of acoustic barriers and/or other appropriate mitigation measures (including refinement of the engineering requirements to adopt lower noise emitting plant, where possible) will ensure that the acoustic mitigation strategy is sufficient to reduce noise to within the adopted criteria.

Reference	Theme	Matter raised	Response
		Query whether reliance on the timber acoustic fencing as the primary acoustic barrier is sufficient, with request for the specification, installation, and maintenance of the barrier to be robustly secured through DCO requirements or consideration of supplementary mitigation. Comment that ongoing noise monitoring and a clear complaints procedure must be established, with adaptive management in place should exceedances occur.	There are various material options that can be adopted for the acoustic barriers. Any timber acoustic fencing to be used as a barrier would have suitable material properties such that the level of noise attenuation required to meet the adopted criteria can be achieved. The specification, installation, and maintenance requirements of any acoustic mitigation scheme would be provided prior to operation and is secured by a requirement of the **Outline Operational Environmental Management Plan [EN010158/APP/7.3]** [APP-139], (Section 2.8). Further detail will be added into the **Outline OEMP [EN010158/APP/7.3]** [APP-139] at Deadline 1 of the examination to set out the commitment for a clear complaints procedure, including compliance noise monitoring and adaptive control measures, where deemed necessary.
RR-026	Soil impacts	Comment that soil impacts are described vaguely, with an absence of a clear land management strategy for the 40-year operational period.	The **Outline Soil Management Plan (SMP) [EN010158/APP/7.7]** [APP-143] describes the mitigation and management strategy for when repair work is required. Track matting and low-pressure vehicles would be used to prevent compaction. During operation, the soil would be under a semi-permanent grassland managed through grazing and a cutting regime. Further details on the operational phase management strategy can be

Reference	Theme	Matter raised	Response
			found within section 5 of the **Outline LEMP [EN010158/APP/7.6] [APP-142].**
RR-026	ALC	Comment that there should be a breakdown of ALC grades, with the two ALC surveys undertaken being presented separately with narrative detailing the ALC limitation of the site included.	A breakdown of ALC grades is shown in Table 12.3 within **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2] [APP-055].** A detailed narrative on ALC limitations and a grade breakdown is shown within **ES Volume 3, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]**.
RR-026	Permanence of Green and Blue Infrastructure	Comment that there is uncertainty regarding permanent land take for Green and Blue Infrastructure and clarity should be provided.	As set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**, the land within the Order Limits would be reinstated in accordance with the **Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4] [APP-140]**. Landscape structural planting, including tree planting, hedgerows, scrub, and ponds, created to deliver biodiversity mitigation associated with the Proposed Development would be left in situ when the Site is handed back to landowners. Ecological mitigation areas would be handed over to the relevant landowners, unless agreed otherwise. Consultation with appropriate stakeholders and landowners would be undertaken in advance of the decommissioning phase to discuss opportunities to maintain and manage the ecological mitigation beyond

Reference	Theme	Matter raised	Response
			the lifespan of the Proposed Development, as appropriate. The permanently diverted PRoWs would not be altered any further and would remain, post-decommissioning of the Proposed Development. Subject to discussion with the landowner at that time, for the purposes of assessment it is assumed that the permissive footpaths would be removed at the end of operation. The total hectares of the permanent land take due to Green and Blue Infrastructure is currently not known as it is up to the discretion of the landowner following the decommissioning of the Proposed Development. Therefore, a reasonable worst-case scenario approach has been used for the assessment of each aspect within the soil and agriculture assessment as shown in **ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2] [APP-055].** The assessment assumed a reasonable worst-case scenario that some of the green and blue infrastructure would be permanent but none of it would be within areas of BMV land.
RR-026	Grazing	Comment that the potential on site for continued agricultural production in the operational phase should be clarified and secured in the DCO if it is a viable option.	Normal agricultural use (e.g. arable and/or grazing as current) would continue (except for the cable installation and access track construction) in Work Nos 2B, 6, 7 and 10B (**Works Plans [EN010158/APP/2.3.2] [AS-006]**) (all areas outside of main developable Parcels).

Reference	Theme	Matter raised	Response
		Should this not be a potential, the Application should remove the option for continued agricultural production to allow a complete assessment of agricultural land loss.	Within the areas proposed for Solar PV grazing is a potential option. The removal of grazing from the assessment would not change the conclusions reached within the assessment, as agricultural pressures would still be removed during the operational (including maintenance) phase of the Proposed Development and the area under the Solar PV would still be kept within a grassland system. These two activities would still result in the soil carbon and structure being improved under the Solar PV areas during operation therefore grazing being present or absent to the Site will not change the conclusions of the assessment.
RR-026	Approach to assessment	Comment that the Applicant has combined all soil ecosystems services, other than biomass production, together which is not appropriate as it encompasses too many separate variables to be credible.	The receptor soil ecosystems mainly refers to the soil's structural resilience which is determined through texture and field capacity days. The approach taken follows the industry standard guidance IEMA (2022): A New Perspective on Land and Soil in Environmental Impact Assessment.
RR-026	Outline SMP	Comments about the **Outline SMP [EN010158/APP/7.7] [APP-143]** including: • That the plan does not identify that the soil within the Order Limits is clay which is difficult to	The Applicant has addressed each point below: • It has been recognised that the soil within the Order Limits is heavy textured (clay) so additional mitigations have been inbuilt into the **Outline SMP [EN010158/APP/7.7] [APP-143]** following Natural England's request. Natural England is now satisfied with the level of caution within the **Outline SMP**

Reference	Theme	Matter raised	Response
		manage and at high risk of damage due to compaction. • That as part of the SMP the condition of field drainage should be assessed and reviewed for any remedial action prior to construction. • Land drainage should be installed to a sufficient degree to support both the operational and decommissioning phase and technical discussion provided in para 6.3.7 should be expanded to cover the full project. • The topsoil classification conclusions are not considered to be correct. The whole site should be Unit C (Red) – low tolerance to structural damage and the oSMP updated accordingly. • A clear statement in para 3.1.6 and 5.3.10 on who would be the 'suitably trained person' who will make the determination of soil plastic state and suitability for	**[EN010158/APP/7.7]** **[APP-143]** to prevent structural damage to heavy textured soils. • The nature and construction of the cable laying activities would be assessed in each field and advice sought from a land drainage specialist regarding the requirement for remedial drainage works, this may involve reconnecting existing drains or installing new remedial drains. Paragraph 5.3.8 of the **Outline SMP [EN010158/APP/7.7]** **[APP-143]** will be updated to reflect this statement at Deadline 1. • Paragraphs 6.3.7 of **Outline SMP [EN010158/APP/7.7]** **[APP-143]** will be expanded to include; "new remedial drainage may be required as a result of pre- and / or post- construction works depending on the nature and scale of construction activities, soil type and presence of existing land drains in any given area". This update will be provided at Deadline 1. • This is incorrect; whilst the topsoil texture across the Site are heavy textures, the field capacity days across the Site are 136-142 therefore as the FCD are below 150 the topsoil classification is Unit B (Orange). The topsoil classifications are correct and cross-validated between multiple trained surveyors and lab analysis. • The **Outline SMP [EN010158/APP/7.7]** **[APP-143]** will be updated, and submitted at Deadline 1, to further

Reference	Theme	Matter raised	Response
		work to proceed, with roles and responsibilities added into the oSMP. • Remove or rewording para 5.3.11 which provides the opportunity to strip soil when they are in a plastic state to state that under 'unusual and extreme instances, plastic soils may need to be disturbed', reflecting the fact that this is an unusual step with substantial harms. These stockpiled soils must be marked as needing reconditioning prior to reuse. • A coherent land management strategy for the array areas during the operation period has not been provided. • A requirement for addition soil sampling should be added into the OSMP to provide sufficient baseline soil texture information for the detailed SMP as this is currently considered insufficient.	clarify who the 'suitably trained person' will be an experienced person who is trained by a soil specialist. • Soils would not be stripped when they are below the plastic limit. They would only be stripped when dry to prevent any structural damage as soils become plastic and can cause smearing when handled wet. • Further land management within the Solar PV areas would be provided within the Detailed Soil Management Plan. • Additional soil sampling is not necessary. Soil textures have been recorded at every auger (1 per hectare) as seen in the **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]** [APP-126].

Reference	Theme	Matter raised	Response
RR-026	Cumulative effects assessment	Comment that the cumulative effects assessment does not assess the impact on the local ALC land quality resource from other local infrastructure projects in the area.	A cumulative assessment for soils and agriculture has been undertaken which considers projects within 1km from the Site. This is located within **ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. No significant cumulative effect on agricultural land was found and noting that only 1.51% of the Site is considered to be BMV land, further assessment was not considered necessary.
RR-026	Ground investigation	Comment that it is unclear how the initial ground investigation was scoped, and whether the scope and methodology was agreed with the relevant consultation bodies. Request for the investigation to target potential sources of contamination identified within the **Preliminary Risk Assessment** (**ES Volume 4, Appendix 11.1 [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]**), and potential ground gas and groundwater risks with robust monitoring and testing. Comment that there was no leachate analysis or gas or groundwater monitoring	GI works have occurred across parts of the Order Limits where access has been granted and were undertaken based on the information available in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]**. Section 11.5.25 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** indicates that, in accordance with **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123],** the identified potential contaminant linkages should be assessed further through appropriate pre-construction ground investigation. This investigation is secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138]** to target the identified sources of potential contamination and assess the feasibility of identified pathways.

Reference	Theme	Matter raised	Response
		installations within exploratory holes.	As indicated in Section 11.9.1 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054], the initial phase of ground investigation work has been undertaken, as access allowed, as presented in **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** [APP-125]. This phase of work did not include any interpretative work elements, and this will follow when all phases of ground investigation have been completed. This was secured by the **Outline CEMP [EN010158/APP/7.2]** [APP-138]. As detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]** [APP-138], the further required phases of ground investigation work would be completed prior to construction works commencing. The scope would be agreed in advance with Buckinghamshire Council (and the Environment Agency, where appropriate) and the findings would be issued to Buckinghamshire Council (and the Environment Agency, where appropriate). This additional ground investigation (and the associated interpretative reporting) would provide further information relating to potential pollutant linkages that were identified by **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]. Any remedial action required as a result of any findings from the further phases of ground investigation work would be agreed in advance with

Reference	Theme	Matter raised	Response
			Buckinghamshire Council, and the Environment Agency, where appropriate, in terms of scope of work for remediation, validation and verification. In response to the comments received, it is noted that these subsequent phases of ground investigation should incorporate assessment of groundwater and ground gas risks where appropriate, with the scope of work for monitoring and sampling to be agreed in advance with Buckinghamshire Council and the Environment Agency, where appropriate. The scope of work should include provision of groundwater and ground gas monitoring wells where appropriate (based on the information provided in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]).
RR-026	Impacts from BESS	Comment that the BESS is a significant concern for effects on land and groundwater, given the potential for fires, chemicals and contamination thereby produced, and these impacts should be considered in the operational assessment.	Section 11.9.7 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054] provides discussion of the potential for impacts from firewater associated with the BESS, and for managing issues relating to the control and safety of the BESS, with further reference to the **Outline OEMP [EN010158/APP/7.3]** [APP-139], **Outline Battery Safety Management Plan [EN010158/APP/7.9]** [APP-145] and **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147]. These issues are also considered in Section 11.10.6 and 11.10.8 (**ES Volume 2, Chapter 11: Land and**

Reference	Theme	Matter raised	Response
			Groundwater [EN010158/APP/6.2] [APP-054]), where assessment of the potential for adverse impacts on groundwater from contamination associated with the BESS (including firewater) is provided. The sensitivity of receptors, magnitude of impacts and extent of the residual effects taking into account mitigation to reduce the impact on groundwater are concluded to be not significant, based on the methodology used within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]**.
RR-026	Approach to assessment	Comment that the discussion of physical impacts on geology is high level, with limited detail provided on geological units or how they would be impacted.	Section 11.5.26 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** provides a summary of the baseline geological conditions beneath the Order Limits and study area. Section 11.5.26 provides a summary of the baseline geological conditions beneath the Order Limits and study area. Further details on this topic are provided in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]** and in **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**. The assessment methodology adhered to in considering the sensitivity and magnitude of change in regard to geological units is presented in Tables 11.5 and 11.7 of **ES Volume 2 Chapter 11: Land and Groundwater**

Reference	Theme	Matter raised	Response
			[EN010158/APP/6.2] [APP-054], with the significance of effect being derived from the matrix presented in Table 11.9 of that chapter. An assessment of likely effects acting on the physical characteristics of the geological units is presented in Section 11.8.1 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** for the construction phase, Section 11.8.4 for the operation (including maintenance) phase and Section 11.8.7 for the decommissioning phase.
RR-026	Approach to assessment	Comment that the assessment in relation to groundwater levels and flow lacks detail, and specific information on groundwater depth and flow direction is not provided, with specific reference to the potential for shallow groundwater impacts on the BESS.	The assessment with respect to groundwater provided in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** was completed on the basis of information made available from the desk-based assessment provided in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]** with some intrusive information as detailed in **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125].** The Applicant will complete further ground investigation (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]** and the information from **ES Volume 4, Appendix 11.3: Ground**

Reference	Theme	Matter raised	Response
			Investigation Report [EN010158/APP/6.4] [APP-125], and agreed with Buckinghamshire Council, (and the Environment Agency, where appropriate)) prior to any works commencing. It is noted that there is currently little data on the site-specific groundwater conditions. However, this does not change the fact that the groundwater importance is categorised on the basis of the aquifer designations (according to Table 11.6 of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054]), which are applied by the Environment Agency based on national mapping. More information on site-specific groundwater conditions would be collected during ground investigation work that is still to be completed (as secured within **Outline CEMP [EN010158/APP/7.2]** [APP-138]), which will allow a better understanding of the specific groundwater regime, but will not fundamentally change the assessment in terms of the groundwater importance, or the magnitudes of impact that are applied for considering groundwater receptors (Table 11.8 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054]). Although the Applicant acknowledges that additional knowledge regarding the current groundwater regime is important (and it will collect this during further work, as secured by the **Outline CEMP [EN010158/APP/7.2]** [APP-138]), it would like it to be noted that the current

Reference	Theme	Matter raised	Response
			range of mitigation measures for protection of groundwater receptors would be effective in protecting groundwater of all importance rankings, across all areas of the Order Limits including the BESS (as detailed in the **Outline CEMP [EN010158/APP/7.2]** [APP-138], **Outline OEMP [EN010158/APP/7.3]** [APP-139] , **Outline DEMP [EN010158/APP/7.4]** [APP-140], **Outline BSMP [EN010158/APP/7.9]** [APP-145] and **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147].
RR-026	Groundwater	Note that the baseline identifies that a shallow groundwater table is expected close to surface watercourses, with flood maps indicating that there is potential for groundwater flooding to occur at the surface in the area of the proposed BESS in field D8 and D9. Comment that flooding from groundwater has not been mentioned within **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054] with the overall groundwater flood risk stated to be low in the **Flood Risk Assessment (ES Volume 4,**	The Applicant would complete further ground investigation work as secured within **Outline CEMP [EN010158/APP/7.2]** [APP-138] (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123] and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** [APP-125], and agreed with Buckinghamshire Council, (and the Environment Agency, where appropriate)) prior to any works commencing. Groundwater flooding has been considered within **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054] and a full assessment of flood risk from ground and surface water is detailed in **ES**

Reference	Theme	Matter raised	Response
		Appendix 16.1 [EN01058/APP/6.4 [APP-132]). Request for assessment of groundwater levels with site-specific groundwater data to confirm the suitability of the proposed location of the BESS.	**Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132].** Information relating to site-specific groundwater levels and surface water flooding in D8 and D9 have been accounted for in the design development and location of the BESS.
RR-026	Effects on groundwater	Comments on the assessment of residual effects, including: • That the assessment considers proposed additional mitigation measures in addition to embedded mitigation, e.g. ground investigation, CEMP. • The assessment of residual effects only covers impacts from contamination and does not discuss effects on the physical characteristics of geological units. • The assessment assumes that there is no significant existing contamination present but does not provide information about what this statement is based on.	The effects on groundwater are assessed after consideration of embedded and additional mitigation measures, with the residual effects being determined after consideration of the completion of any ground investigation work (and any subsequent remediation and validation, if required). Residual effects on groundwater as a result of physical changes to geological units have the potential to occur if there are changes to the geological units which result in changes to the manner in which groundwater travels within the units. However, after completion of the ground investigation work, and subsequent to adherence to all relevant mitigation measures within the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, **Outline OEMP [EN010158/APP/7.3] [APP-139]**, and **Outline DEMP [EN010158/APP/7.4] [APP-140]**, there is not expected to be any significant effects on the groundwater body quality or quantity as a result of changes to the physical characteristics of geological units.

Reference	Theme	Matter raised	Response
			The selection of the category to apply to the magnitude of impact for this aspect of the assessment is made by applying professional judgement, while adhering to the categories defined in Table 11.8 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054]). No significant contamination can be committed to on the basis that ground investigation work is required to identify and provide details on any existing contamination (as secured within **Outline CEMP [EN010158/APP/7.2]** [APP-138] (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123] and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** [APP-125]) and will be agreed with Buckinghamshire Council, (and the Environment Agency, where appropriate)) prior to any works commencing. Any identified contamination would then be required to be remediated, in accordance with a scope of work to be agreed with Buckinghamshire Council (and the Environment Agency, where appropriate), prior to any construction works commencing. This applies to the potential for existing contamination to be present. There are also measures within the **Outline CEMP [EN010158/APP/7.2]** [APP-138], **Outline OEMP**

Reference	Theme	Matter raised	Response
			[EN010158/APP/7.3] **[APP-139]**, and **Outline DEMP [EN010158/APP/7.4]** **[APP-140]** to ensure that if unexpected existing contamination is encountered once construction works commence (or during the operation or decommissioning phases), that works are stopped until an agreed method of remediation and validation is confirmed with Buckinghamshire Council (and the Environment Agency, where appropriate). It is therefore possible to determine that, after resolution of any issues relating to contamination via these mechanisms, there would be no residual contamination that could result in a significant effect on the groundwater receptor.
RR-026	Monitoring	Comment that additional investigation, monitoring and/or remediation may be required should any contamination be identified and this should be included in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** **[APP-054]** as well as ground investigation as additional mitigation.	The Applicant has committed to undertaking remediation and validation work relating to any identified contamination, both in advance of works commencing works (after results of the ground investigation have been assessed), and if any unexpected contamination is identified during works (or if a contamination incident occurs as a result of works). The ground investigation is secured within the **Outline CEMP [EN010158/APP/7.2]** **[APP-138]** (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** **[APP-119]** **[APP-120]** **[APP-121]** **[APP-122]** **[APP-123]** and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** **[APP-125]**). The actions to be undertaken in the event

Reference	Theme	Matter raised	Response
			that existing unexpected contamination is encountered (or a contamination incident occurs) during works are detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, **Outline OEMP [EN010158/APP/7.3] [APP-139]**, and **Outline DEMP [EN010158/APP/7.4] [APP-140]**. If remediation works are required, any subsequent remediation and associated monitoring would need to be agreed specific to the situation that has been encountered and cannot be defined in advance. The scope of remediation work and associated monitoring would be agreed by Buckinghamshire Council (and the Environment Agency, where appropriate), as defined within the management plans detailed above.
RR-026	Mitigation measures	Comment that the BSMP and Drainage Strategy should address fire risks and release of fire-fighting water, and a Piling Risk Assessment should be produced.	Fire risks and methods for dealing with fire-fighting water are considered in numerous sections within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**. As the Proposed Development progresses to the detailed design stage, further details would be agreed in relation to these issues, which will be covered in the detailed versions of those plans. The Applicant has included a commitment to complete a Piling Risk Assessment, as listed in Table 3.6 of the **Outline CEMP [EN010158/APP/7.2] [APP-138].**

Reference	Theme	Matter raised	Response
RR-026	General comment	Comment that as LLFA the Council considers the Proposed Development cannot be consented as it hasn't been demonstrated that the drainage strategy is feasible or that flood risk would be appropriately managed on or off-site.	The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** has been developed in consultations with the Lead Local Flood Authority (LLFA) and the Internal Drainage Board (IDB). The approach on surface water disposal and calculation methodology of the proposed runoff rates were agreed in principle by both the LLFA and IDB as part of the engagement undertaken by the Applicant and detailed in **Annex C** of **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**. The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** sets out the principles and the framework for managing surface water and foul drainage across the Site, ensuring compliance with national and local planning policies and environmental standards. Following this, the detailed drainage design stage would provide further technical details of the implementation of these measures to ensure that the Proposed Development does not impact on flood risk and water quality to any receptors from surface water and foul drainage. A sequential based approach has been adopted to flood risk with only Solar PV being placed in areas of potential flood risk. These Solar PV panels are a minimum 1800mm above ground freeboard to ensure they remain above the design flood event water levels. This freeboard significantly exceeds standard allowances typically applied to such low-vulnerability infrastructure and

Reference	Theme	Matter raised	Response
			ensures resilience to residual risks, including climate change uncertainty and modelling limitations. All flood sensitive equipment including the BESS, Substation and construction compounds have been located in areas of lowest flood risk.
RR-026	Outline Drainage Strategy	Comments on the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** including: • That it is highly conceptual and does not provide a fixed design. • That it does not confirm which SuDS components will be implemented, their locations, or how they will function collectively to achieve attenuation, water	• The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** sets out a strategy outlining the principles for managing surface water runoff across the site, these were produced following engagement with the LLFA and IDB officers. It has been informed by an example design and has used reasonable worst-case assumptions based on the Proposed Development footprints and construction characteristics expected for the proposed infrastructure. **Annex E – Outline Drainage Strategy Drawings and Cross Section** of the Plan provide some preliminary details for Parcel 1, whereas the drawings provide more details for the Parcel 2 and 3.

Reference	Theme	Matter raised	Response
		quality treatment, and exceedance control. • Comment that further detail is needed for the LLFA to assess storage adequacy, hydraulic connectivity, or compliance with policy.	Further drainage design would be undertaken at the detailed design stage of the Proposed Development. • The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** provides the SuDS component types, their indicative locations and how attenuation, water quality and exceedance control will be achieved. Location of SuDS features for Parcels 2 and 3 can be found in the drawings provided in **Annex E – Outline Drainage Strategy Drawings and Cross Section** of the Plan. • Provision of further detailed drainage design for Parcels 1, 2 and 3 is anticipated at detailed design stage when development layouts are finalised and individual SUDS component locations would be confirmed along with storage capacity exceedance flow routing and discharge locations.
RR-026	Approach to assessment	Comment that two soakaway tests were undertaken (TP002 and TP014) which is insufficient for a site of this scale.	The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** demonstrates that a conservative approach has been taken, assuming that infiltration is not considered a viable primary surface water disposal method for the proposed development. Partial infiltration has been assumed for the conveyance SuDS, which is subject to further ground investigation and infiltration potential from underlying geology.

Reference	Theme	Matter raised	Response
			Ground investigation work has only been completed within the part of the Site boundary and further investigations are anticipated. The limited number of test locations resulted from site constraints and access restrictions; these initial investigations served as a preliminary assessment of the permeability potential of the underlying ground to inform the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**. The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**, Paragraph 4.2.2. notes that: "*all conveyance SuDS are proposed to be grassed to allow partial infiltration subject to detailed design and geotechnical recommendations"* and also further in Paragraph 4.4.8. states that "*it is assumed that proposed SuDS features, such as swales, will be designed to promote partial infiltration where feasible."* With reference to permeable paving Paragraph 4.2.9. of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** states that: "*Detailed design is subject to confirmed local infiltration potential and depth of the groundwater table."* Paragraph 12.2.3. of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** states that: "*Site surveys should be undertaken prior to detailed design to confirm ground conditions at proposed structure and storage locations. Where previous ground investigations*

Reference	Theme	Matter raised	Response
			have not been carried out, further site-specific investigations — including BRE Digest 365 infiltration testing — will be required to determine soil permeability, groundwater depth and suitability for infiltration based SuDS. These findings will inform the detailed drainage design."
RR-026	Groundwater monitoring	Comment that no groundwater monitoring data has been provided, despite evidence that groundwater levels during a 1 in 100-year event may be within 5 m of the surface, compromising the performance of below-ground attenuation features.	GI works have occurred across parts of the Order Limits where access has been granted. The Applicant would complete further ground investigation work as secured within the **Outline CEMP [EN010158/APP/7.2]** [APP-138] (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123] and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4]** [APP-125]), and agreed with Buckinghamshire Council (and the Environment Agency, where appropriate) prior to any works commencing. This approach is in line with other similar projects. This work would include obtaining further data in relation to groundwater depths. Information relating to site-specific groundwater levels would allow consideration of groundwater flooding risk, which would be used to develop the detailed version of the **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147].

Reference	Theme	Matter raised	Response
RR-026	Approach to attenuation	Comment that the Applicant's reliance on underground tanks for attenuation is a concern to the LLFA.	Where suitable, above-ground SuDS are proposed and prioritised across the Proposed Development. It has been agreed in principle with the LLFA that where existing constraints limit the use of above ground SuDS, a system of underground tanks would be used to provide adequate attenuation volumes on-site. The potential use of underground tanks for attenuation is mainly associated with the proposed substation where underground options offer a more practical solution during operation of the substation. Additionally, the location of the Claydon Brook fluvial floodplain downstream from the substation restricted the feasibility of implementing above-ground SuDS to support the substation. Agreement in principle from the LLFA regarding the approach is provided in **Annex C** of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**. Overall, the types of SuDS and their location is indicated in drawings **in Annex E** of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**.
RR-026	Approach to assessment	Comment that hydraulic modelling or network calculations have not been provided, and Quick storage estimates and UK SuDS tool outputs are also insufficient, and the Applicant must demonstrate:	The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** provides preliminary calculations for Parcels 1,2 and 3 based on the guidance provided by the LLFA and IDB and limiting the flow to 4l/s/ha and sizing of attenuation features for the 1% AEP + 25% climate change event.

Reference	Theme	Matter raised	Response
		• Compliance with the 4 l/s/ha discharge limit. • Sizing of attenuation features for the 1% AEP + 25% climate change event. • Containment of flows for the 1 in 30-year storm without flooding. • Safe on-site management of exceedance flows for events up to the 1 in 100- year + CC scenario, including mapping of flow paths and flood volumes.	Provision of detailed drainage design including hydraulic modelling of the networks is anticipated at detailed design stage when development layouts are finalised. The drainage network would be designed to contain the 1 in 30-year event storm and to safely manage exceedance flows for events up to the 1 in 100 years + CC.
RR-026	Approach to drainage	Comment that potential pumping to maintain positive drainage should only be used as a last resort where gravity drainage is impracticable. If required, the Applicant must provide: a) Adequate storage to accommodate pump failure. b) Automated warning systems. c) A detailed maintenance plan for pump reliability.	The comments on the provision of adequate storage to accommodate pumping failure, warning systems and maintenance plan are noted by the Applicant. Whilst the primary aim is to provide positive drainage for the whole site, at the detailed design stage the development layouts and finished platform levels will be finalised and further surveys of receiving ditches/watercourses will be undertaken to determine any pumping requirements. This will be a last resort.
RR-026	Water quality	Comment that water quality should be managed through SuDS features such as swales, ponds,	An assessment using the Simple Index Approach in accordance with SuDS Manual Ciria C753 has been undertaken and results for all Parcels are provided in the

Reference	Theme	Matter raised	Response
		and bioretention areas and the Applicant should confirm SuDS components for verification of compliance.	**Outline Drainage Strategy [EN010158/APP/7.11] [APP-147].** This provided information on the level of treatment provided by the proposed SuDS features. Where required, additional measures have been proposed to mitigate pollution risk from the high pollution hazard areas. This is presented in Section 8: Water Quality of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** and proposed to be implemented as part of the detailed drainage design.
RR-026	Additional information	Comment that a maintenance schedule and construction drawings for all SuDS and drainage components should be provided.	The Applicant recognises the need for a maintenance schedule for all SuDS and drainage components, as outlined in Section 9: Management and Maintenance of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147].** A typical SuDS maintenance inspection checklist in accordance with the SuDS Manual is provided in **Annex F** of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**. Construction drawings of the SuDS elements and drainage components would be provided for at the detailed design stage. The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** which forms the framework for the detailed drainage strategy is secured via a requirement of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**. Routine inspection and maintenance of the site would be undertaken as part of the operational management

Reference	Theme	Matter raised	Response
			regime, and construction-phase drainage and pollution control measures are secured through the **Outline CEMP [EN010158/APP/7.2] [APP-138],** and the **Outline OEMP [EN010158/APP/7.3] [APP-139]**.
RR-026	Construction workers	Request for clarification on the number of construction jobs created and where these would be fulfilled from to assess benefit to Buckinghamshire, including workforce spending.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** estimates that during the construction phase, a (gross) peak of approximately 600 workers may be on-site at any one time, with the peak extending for the duration of the construction period (i.e. also an average of 600 over the 30-month construction period). Applying average workforce mobility assumptions from industry surveys, and standard additionality assumptions (displacement, leakage) to this figure results in an estimated net additional employment average of approximately 420 to 470 FTEs per year in the CLMA; or 180 FTEs per year in the CLMA Focus Area. It cannot be accurately considered what proportion of this estimate would accrue to Buckinghamshire in terms of economic or employment benefit – such estimates would be determined in part by commercial agreements. Notwithstanding this, Buckinghamshire Council is the host authority for the Proposed Development, and the relevant planning authority responsible for approval of the detailed Employment, Skills and Supply Chain Plan, and therefore it would be able to work with the Applicant to

Reference	Theme	Matter raised	Response
			direct measures to be secured within the Plan to the primary benefit of its residents and businesses. The **Outline Employment, Skills and Supply Chain [EN010158/APP/7.14] [APP-150]** aims to help maximise the positive gain for the local economy from the beneficial effect arising from employment generation.
RR-026	Employment and skills	Request for confirmation that employment and skills activities outlined in the **Outline ESSCP [EN01058/APP/7.14] [APP-150]** would be focused on Buckinghamshire residents, particularly with the CLMA Focus Area which is identified as the area within which to target proactive activity.	The CLMA Focus Area (see **ES Volume 3, Figure 14.3: CLMA Focus Area [EN010158/APP/6.3] [APP-073]**) is principally focused on Buckinghamshire, however it is noted that the Proposed Development is broadly equidistant between major urban areas of Milton Keynes (Milton Keynes), Bicester (Cherwell) and Aylesbury (Buckinghamshire). As such, it is likely that the economic benefit relating to construction employment and supply chain may extend across different local authority areas. However, Buckinghamshire Council is the host authority for the Proposed Development, and the relevant planning authority responsible for approval of the detailed Employment, Skills and Supply Chain Plan, and therefore would be able to work with the Applicant to direct measures to be secured within the Plan to the primary benefit of its residents and businesses.

Reference	Theme	Matter raised	Response
RR-026	Employment opportunities	Comment that the rural location of the Proposed Development is difficult to access by public transport, meaning it is unlikely residents in more deprived areas of the county would access employment opportunities and therefore measures to support access to the Proposed Development should be considered.	The Applicant acknowledges that this is a challenge faced by all rural infrastructure schemes, and has been raised during engagement on the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**. Measures targeting communities that have disproportionate levels of multiple deprivation and low social mobility will form part of the Detailed Employment, Skills and Supply Chain Plan. The organisations closest to those communities would be consulted, including Opportunity Bucks and Jobcentre Plus. Potential solutions discussed during stakeholder engagement included harnessing Jobcentre Plus ancillary support to provide job seeker clients with bus transport to the site.
RR-026	Construction workers	Comment that due to other infrastructure projects locally, there is high demand for construction workers, which means there may be a shortage of workers with experience and interest in the sector. Consideration should therefore be given to whether more intensive effort is needed to reach those who may have less interest in the sector, require re-training or skills development or face barriers to employment, and subsequently	Cumulative labour market effects are considered within **ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** from paragraph 17.7.46, concluding that, given the scale of the labour market, the characteristics of the construction labour market, the cumulative employment supported (around 2.5% of existing resident construction workers in the CLMA Focus Area today) is likely to result in a low magnitude effect on a medium sensitivity receptor resulting in a temporary, minor beneficial effect (not significant). While the employment, skills and opportunity provided by the cumulative developments reflect a positive contribution to the economic and social policy objectives

Reference	Theme	Matter raised	Response
		whether the Education and Skills Fund is sufficient and how the **Outline ESSCP [EN01058/APP/7.14] [APP-150]** would be co-ordinated and funded.	of local, regional and national policy reported in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**, and therefore present the potential for a beneficial (though not significant) effect, the Applicant is cognisant that stakeholders may be concerned about the ability for the labour market to deliver the number of skilled construction workers without causing shortages in supply, and the policy responsibility for the Applicant to promote employment, skills and supply chain benefits within the local area. As such, the Applicant has produced an **Outline ESSCP [EN010158/APP/7.14] [APP-150]**, with a detailed Skills, Employment and Supply Plan being secured by a Requirement to the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**. The **Outline ESSCP [EN010158/APP/7.14] [APP-150]** intends to: • Promote opportunities for people who are employed, unemployed and economically active and young people who are not in Education, Employment or Training to access employment and skills development opportunities; • Create opportunities for businesses to tender for work and join the supply chain of the Proposed Development; • Clearly define the workforce, skills and supply chain requirements of the Proposed Development and

Reference	Theme	Matter raised	Response
			articulate these in a clear and timely way to relevant stakeholders involved at a County- and Regional-level in supporting education, access to employment, skills development and business engagement; • Harness the motivational potential of the Proposed Development to inspire the next generation of talent, particularly, to confidently invest in a career and future in Buckinghamshire, benefitting all employers; and, • Contribute to an evidence base to support the planning and delivery of education and skills curricula and training capable of delivering the workforce and skills needed across the County and wider Region, at the right time, to support the business competitiveness of all energy and construction projects. Through the measures to be developed within the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**, existing workers and firms may be able to up/re-skill to the benefit of the Proposed Development but also supporting their own career development and strategic policy objectives to improve the skills base in green construction sectors that will aid future cumulative demand for similar skills across the region's renewable energy sector.

Reference	Theme	Matter raised	Response
RR-026	Longevity of benefits	Comments that the majority of economic benefits would arise during the comparatively short construction phase relative to the lifetime of the Proposed Development. Request for the Applicant to consider how it can secure longer-benefits with examples including: working with other construction employers to broker introductions for employees, equipping individuals with the skills, experience and connections to secure good employment on completion of construction.	The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that the government's stated policy objectives for the energy system are to ensure our energy supplies always remains secure, reliable, affordable, and consistent with achieving net zero by 2050, and that "*solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector*" (NPS EN-1 (2023) Para 2.10.9). As such the Proposed Development would deliver long term benefits through the provision of secure, low-carbon and low-cost energy supplies which will also shield consumers from the effects of volatile international energy markets. Paragraph 2.1.6 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** acknowledges that most of the potential economic benefits from the Proposed Development would arise during the 30-month construction phase. It confirms that those benefits that would arise through the operational phase would be more limited, but they would still provide opportunities for Buckinghamshire residents and businesses. It also confirms that the detailed Employment, Skills and Supply Chain Plan would incorporate activities relating to both the construction and operation phases. The Applicant would work with Buckinghamshire Council to identify proportionate activities to secure the long-term benefits of the construction phase for individuals beyond

Reference	Theme	Matter raised	Response
			the construction phase, within the detailed Employment, Skills and Supply Chain Plan. Section 2.5 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** states that prosperity of the renewable energy sector, local communities and businesses is increasingly dependent upon inter-agency and cross company collaborations. As part of this, the Applicant has explored with Buckinghamshire Council existing structures that could provide vehicles for this collaboration. Keenly aware of the importance of raising awareness of the Proposed Development across local institutions and embedding collaborative working, the Applicant has entered into a partnership with Bucks Business First (BBF) to become a 2025/6 sponsor for the Bucks Skills Hub and a BBF Ambassador. The Applicant will participate in the well-established, industry-chaired BBF Construction Sector Employer Group, which will connect the Proposed Development with other construction businesses within Buckinghamshire and enable the Applicant and its contractors to create routes for construction workers from the Proposed Development onto other schemes.
RR-026	Local businesses	Comment that the extent of the benefits to local businesses would be dependent upon the nature of the supply chain opportunities and	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** sets out an assessment of potential supply chain effects noting that the production of materials, and their installation at the Proposed

Reference	Theme	Matter raised	Response
		the degree to which local businesses can meet these.	Development, along with goods and labour associated with the construction activity, will result in indirect economic effects. These effects would largely be determined by where the contracts for materials are procured. It is acknowledged (paragraph 14.8.14) that the level of retention of supply chain benefit varies depending on the project and will be a commercial decision of the contractor who would seek to source materials and employ some local and some regional or even national sub-contractors. As such, the spatial context of supply chain effects could range from local to national depending on the supply and sourcing of construction materials and other supplies. Creating opportunities for businesses to tender for work and join the supply chain of the Proposed Development is a core objective of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**, with 'Theme 3' specifically concerning measures to open up the supply chain, committing the Applicant and Tier 1 contractors to deliver activities in collaboration with organisations that engage with businesses, to promote awareness of contracting opportunities for local businesses. Table 2.1 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** sets out how key stakeholders with relationships to business would be engaged to this end. A

Reference	Theme	Matter raised	Response
			key local partner would be Bucks Business First, which has agreed to work closely with the Applicant to collaborate on organising and delivering market warming events to signpost potential contracting opportunities to businesses and support their readiness to tender.
RR-026	Decommissioning	Note that the **Outline ESSCP [EN01058/APP/7.14] [APP-150]** does not include the decommissioning phase. Request that the decommissioning stage includes an approach to maximising local employment, skills and supply chain benefits, utilising the relationships developed through the construction phase activities and applying any learning and best practice from these.	The **Outline ESSCP [EN010158/APP/7.14] [APP-150]** will be amended and resubmitted into Examination at Deadline 1 to include the decommissioning phase to maximise legacy benefits.
RR-026	Gravel and mineral safeguarding area	Comment that in considering the Proposed Development's location within a gravel and mineral safeguarding area, there is not currently cause for concern as the **Mineral Safeguarding Assessment [EN010158/APP/5.7.2] [AS-027]**	The Applicant acknowledges Buckinghamshire Council's confirmation that the Mineral Safeguarding Assessment (which is provided for as Appendix 2 to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) does not give rise to concern and that it evidences compliance with Policy 1 of the Buckinghamshire Minerals and Waste Local Plan 2016-2036.

Reference	Theme	Matter raised	Response
		complies with Policy 1 of Buckinghamshire Minerals and Waste Local Plan 2016-2036, noting that the assessment should be updated to include the limited extent of ground investigation (28 holes at 5m depth) which occurred in November 2024.	The **Outline CEMP [EN010158/APP/7.2] [APP-138]** secures that further environmental surveys and investigations (such as ground investigations for minerals) would be completed at a suitable time should the Proposed Development obtain development consent, prior to construction works commencing. The relevant report(s) and/or survey(s) would be issued to the Local Planning Authority. Such works would also include consideration of the information from the November 2024 investigation. The Applicant considers that this approach is commensurate with the nature of the Proposed Development and the potential likely value of the mineral being safeguarded.
RR-026	Materials and waste	Comments about the scope and depth of information presented on material assets and waste, which was scoped out of the ES, including: • That **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** does not include potential streams and volumes of construction materials and waste	**ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4] [APP-085]** sets out the potential waste streams and estimated total volumes of waste during construction, operation and decommissioning. No soils would be removed from the Site and all aggregate would be recycled on Site unless there is an instance for contaminated soil to be removed. There would be minimal packaging and office waste from the Proposed Development, the majority of which would be recycled. Detailed estimates will be provided in the detailed Construction Environmental Management Plan.

Reference	Theme	Matter raised	Response
		disposal in line with the **EIA Scoping Report** (**ES Volume 4, Appendix 5.2 [EN010158/APP/6.4] [APP-079]**). • That **ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4] [APP-085]** does not cover several waste types outlined in the environmental management plans including aggregate, soil, packaging and office waste, and clarification is needed whether quantities are annual or total and the basis for the recycling rate shown. • That there is not a document for materials to be used, e.g. concrete, steel and aggregate used for permanent structures and temporary construction compounds.	A technical note has been submitted at Procedural Deadline A as Appendix 1 to this document in order to provide further detail on the landfill and waste capacity in the region alongside a review of the cumulative schemes and anticipated waste generation. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** details the materials that are anticipated to be used for the construction of the Proposed Development, broken down by each component. The Applicant has considered total waste generation as detailed in **ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4]** [APP-085] and can confirm that vehicle traffic numbers including the delivery and collection of waste and recycling skips have been accounted for within the traffic numbers which have been assessed in the traffic and air quality assessments which is in line with common practice.

Reference	Theme	Matter raised	Response
		• That there is no understanding of the baseline, including current material market or landfill and waste capacity in the area and how this may change accounting for cumulative effects with other projects, like local solar schemes. • That as total waste generation has not been calculated, insufficient assessment has been made of traffic (and connected impacts including air and noise) of importing and removing waste.	
RR-026	Air quality	Comments about the **Air Quality Assessment** (**ES Volume 4, Appendix 6.1 [EN010158/APP/6.4]** [APP-086]), including: • That further controls to manage dust and emissions should be put in place at the time of decommissioning to reflect practice at that time.	• An **Outline DEMP [EN010158/APP/7.4]** [APP-140] has been submitted with the DCO Application and is secured via the Requirements contained in the **draft DCO [EN010158/APP/3.1.2]** [AS-010]. It details management methods to enable the mitigation of potential impacts on the environment during decommissioning of the Proposed Development. • Controls to manage dust and emissions would be reviewed and finalised according to best practice at the time of decommissioning and a detailed Decommissioning Environmental Management Plan

Reference	Theme	Matter raised	Response
		• That the **Transport Assessment** (**ES Volume 4, Appendix 15.1 [EN010158/APP/6.4]** [**APP-131**]) identifies the peak construction traffic year as 2030 whereas the Air Quality Assessment (**ES Volume 4, Appendix 6.1 [EN010158/APP/6.4]** [**APP-086**]) identifies 2029 and this should be clarified. • That if staff numbers by minibus cannot be secured, emissions need to be reassessed to reflect a worst-case scenario.	will be produced to this effect, prior to the commencement of decommissioning. • The **Transport Assessment** (**ES Volume 4, Appendix 15.1 [EN010158/APP/6.4]** [**APP-131**]) has assumed a future year of 2029, in the event that the project commences earlier and to avoid traffic impacts being diluted by a further year of traffic growth. All traffic assessment undertaken are on the basis of 2029 traffic flows. The figures in both **Transport Assessment** (**ES Volume 4, Appendix 15.1 [EN010158/APP/6.4]** [**APP-131**]) and the Air Quality Assessment (**ES Volume 4, Appendix 6.1 [EN010158/APP/6.4]** [**APP-086**]) are the same. • The Staff Travel Plan is a requirement of the CTMP, which itself is a requirement of the DCO. In this way, the staff modes shares and staff movements are a requirement of the DCO.
RR-026	Cumulative effects	• Comments expressing concern about the cumulative impacts of a number of projects on the local area, with specific reference to Tuckey, Fox Covert, Padbury Brook, Calvert and Longbreach solar farms, East Claydon Greener Grid Park, East Claydon BESS, HS2, EWR,	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [**APP-060**]**.** This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several

Reference	Theme	Matter raised	Response
		Grendon Underwood Prison and the replacement National Grid Substation, including: • That a number of settlements will undergo large-scale change in their surroundings from rural to industrial. • That 40-years is not temporary as there are permanent consequential effects. • That construction programmes would overlap for the next decade, exposing communities to long-term construction impacts, with a lack of binding coordination between projects. • That there has been no evidence of joint working with other projects to manage cumulative effects, with specific reference to HS2. • That the Applicant should consider operational traffic from HS2 and EWR in its transport assessment.	projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms. The assessment concludes that there are a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity including a potential significant effect on Bechstein bats. The Applicant has consulted with HS2, Grendon Underwood Prison, Statera and Statkraft regarding potential cumulative effects and would consult with nearby developments prior to construction on programmes and at the discharge of requirements phase to manage interactions and reduce any associated impacts. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** will be updated at Deadline 1 to clarify the above commitment. The Applicant considers that operational impacts on the land would be temporary as the Proposed Development would be decommissioned after the 40-year operational lifespan and the land would be reinstated. The Applicant acknowledges that there would be a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity as concluded in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.

Reference	Theme	Matter raised	Response
		• That the potential for cumulative noise impacts requires a mechanism to compel collaboration between developers to remedy complaints.	Both HS2 and EWR traffic has been captured in the baseline data used in the assessment presented in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. Ongoing engagement with these, and any other developers, is secured in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. The potential for cumulative noise impacts has been presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060].** Inter-project cumulative noise effects during construction and operational phases are assessed as being not significant. In relation to the origin of construction noise that could be generated by different development sites in the area, it would be expected that noise levels at or above the adopted British Standard significance thresholds would generally be attributable to works taking place in the vicinity of the affected receptor and therefore readily identifiable in terms of their origin. The mechanism for addressing construction phase complaints is set out in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**. It is proposed that further detail will be added into the **Outline OEMP [EN010158/APP/7.3][APP-139]** at Deadline 1 of the examination to set out the commitment for an operational phase noise complaints procedure**.**

2.2. Statutory consultees

2.2.1. The table below set out the responses to the Relevant Representations from statutory consultees and the response from the Applicant.

2.2.2. The Applicant has submitted or intends to submit Statements of Common Ground with the following statutory consultees:

- Anglian Water Services (Deadline 1)
- Environment Agency (Deadline 1)
- Historic England (Deadline 1)
- National Highways (Deadline 1)
- Natural England (Deadline 1)
- A draft Statement of Common Ground with UK Health Security Agency was submitted as part of the Application **[EN010158/APP/5.12]** **[APP-042]** and will be updated at Deadline 1.

Table 2-2: Anglian Water Services

Reference number	Theme	Matter raised	Response
RR-012	Protective provisions	Comment that bespoke protective provisions supplied by AWS should be included in the draft DCO rather than reliance on standard protective provisions included, and engagement should take place to reach agreement.	The Applicant has engaged with Anglian Water to agree protective provisions which would be included in the DCO. Engagement with AWS would be undertaken prior to the commencement of construction activities to identify utilities and agree safe methods of working around existing utilities. Anglian Water has provided the Applicant with a copy of its standard protective provisions, which the Applicant is currently reviewing. The Applicant will provide Anglian Water

			with comments on its provisions in due course, with a view to refining and resolving issues.
RR-012	Existing utilities	Comment that a full boundary check should be undertaken to ensure application documents reflect an accurate account of AWS's land interests within the Order Limits, including AWS existing operational sites near to areas required for temporary possessions and permanent acquisitions e.g. No ECL/3A/1.	The Applicant undertook detailed and thorough due diligence checks to establish and identify all interests in land, when compiling the **Book of Reference [EN010158/APP/4.3]** [**APP-018**]. This included contacting AWS to confirm the extent of their ownership within the Order limits. AWS confirmed the extent of their ownership in writing on the 31.07.2024. The Applicant has since undertaken a number of land registry refreshes to ensure that the information remains accurate and up to date. The Applicant will continue to engage with AWS to ensure the accuracy of information and to discuss any specific items they believe may be missing from the **Book of Reference [EN010158/APP/4.3]** [**APP-018**].
RR-012	Design	Comment that the design of the Proposed Development should minimise interaction with AWS assets/ critical infrastructure and avoid the need for mitigation works and diversions which have associated carbon costs. Example given of positioning solar panels to avoid underground assets. Request for the Applicant and AWS to conduct a clash detection and technical assurance review in relation to AWS assets during the	As per **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.4]** [**APP- 046**], the existing above and below ground utilities across the Proposed Development are not intended to be altered. The offsets of these assets have been discussed with the relevant Statutory Undertakers as part of the design process. However, if diversions are required, these would be carried out in accordance with the Protective Provisions between the Applicant and relevant Statutory Undertaker within the made DCO.

		pre-consent phase, with a review of utilities plans is used to inform proposed works prior to construction insufficient.	The **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3] [APP-065]** was produced to inform the design. As stated in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, further engagement with utilities companies would be undertaken prior to commencement of construction activities to identify utilities and agree safe methods of working around existing utilities with the appropriate offsets.
RR-012	Existing utilities	Comment that due to HS2 works in the area the status, size and location of AWS pipes is subject to change. The stated standoff buffers set out in the Protective Provisions may need be revised to account for this.	The **ES Volume 3, Figure 5.1: Desk-Based Study of Existing Utilities [EN010158/APP/6.3] [APP-065]** was produced to inform the design. As stated in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, further engagement with utilities companies would be undertaken prior to commencement of construction activities to identify the latest utilities and agree safe methods of working around existing utilities with the appropriate offsets. The Applicant is currently reviewing Anglian Water's standard protective provisions. The Applicant will provide Anglian Water with comments on their provisions in due course, with a view to refining and resolving issues as far as possible.
RR-012	Water Resources Assessment	Comment that a Water Resources Assessment has not been included within the Application and this should be provided for clarity on the water requirements of the Proposed Development and any assumptions made.	**ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP- 046]** provides an overview of the water provision that would be required during all phases of the Proposed Development. Further detail on water usage and sources would be supplied post-consent at the detailed design stage of the Proposed Development and will inform the detailed Construction Environmental

		Request for more detail on proposed water usage including temporary or permanent requirements for water supply (domestic and non-domestic) and proposed sources of water.	Management Plan, of which, the Environment Agency are listed as a consultee within the **draft Development Consent Order (DCO) [EN010158/APP/3.1.2] [AS-010]**. The Applicant and AWS have had regular ongoing discussions to seek to co-ordinate the Proposed Development and discuss the requirements for potable and raw water supplies. These discussions have deemed that connections are possible, and discussions will continue through the detailed design stages of the Proposed Development. A pre-planning enquiry Water Supply Assessment has been undertaken with Anglian Water – reference –0225654. This will be appended to the draft Statement of Common Ground with AWS which will be submitted at Deadline 1. Provisional construction flow rates discussions have taken place and the flows have been provisionally granted with Anglian Water. Local water recycling centres for offsite tankard water have also been reviewed and are able to take the estimated volumes during the construction period.
RR-012	Draft DCO – Discharge of Requirements	Request for AWS to be a named consultee under Part 9 Schedule 2 Requirements of the draft DCO on the detailed drainage strategy and detailed surface water management plan, as while there may not be a requirement for a mains connected foul drainage system, the **draft DCO [EN010158/APP/3.1.2] [AS-010]** does include supplemental powers	The Applicant will update the **draft DCO [EN010158/APP/3.1.2] [AS-010]** at Deadline 1 to add AWS as a consultee in respect of the written details of the drainage strategy to be approved under Requirement 9(1). Please note that the surface water strategy is included in the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147].** Requirement 9(2) of the **draft DCO [EN010158/APP/3.1.2] [AS-010]** states that the written details of the drainage strategy must be substantially in

		in Part 4(18) with a general right to connect to any AWS assets.	accordance with the Outline Drainage Strategy. Accordingly, consultation with AWS on the written details of the drainage strategy will include consideration of the surface water strategy.
RR-012	Surface water	Comment that potential embedded design measures should include SuDS at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations with adherence with the drainage hierarchy. Statement that AWS will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances, and confirmation should be provided to AWS by the Applicant that this will not be required. Comment that the detailed drainage strategy should consider any increased risk of surface water and groundwater flood risk arising from the Proposed Development that	The Applicant recognises the comment to include above ground SuDS to manage surface water runoff at temporary site compounds. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** outlines how surface water runoff would be managed at the construction phase of development to ensure that flood risk to AWS infrastructure from third party works during construction is avoided. The Applicant confirms that no surface water runoff is proposed to any AWS assets as part of the Proposed Development. Further details on how surface water runoff is proposed to be managed is provided in **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147].**

		could exacerbate sewer flooding risks due to ingress to AWS networks and take account of potential future extreme weather events. It should also include reference to AWS infrastructure and provide temporary effects on flood risk from third party infrastructure works during the construction phase.	
RR-012	Management plans	Comment with reference to framework management plans requesting specific reference on how interfaces with utility assets within the Order Limits would be managed through construction of access tracks and bellmouths, including measures to protect these assets from damage (e.g. compaction and vibration) and assurances that full-time access to AWS to its assets would be provided. Comment that AWS reserves its position on the need to be included as a consultee to detailed management plans, under the discharge of requirements relating	The Applicant acknowledges AWS's comments regarding Requirements 11, 12, 13 and 18 of Schedule 2 of the **draft DCO** [**EN010158/APP/3.1.2**] [**AS-010**]. Further engagement with AWS would be undertaken prior to commencement of construction activities to identify utilities and agree safe methods of working around existing utilities. Offsets around major utilities would be implemented, as agreed with each utility owner, to avoid impacts. The **Outline CEMP [EN010158/APP/7.2]** [**APP-138**] contains information and measures for protection of underground utilities and further detail would be contained within the detailed Construction Environmental Management Plan following further engagement with AWS and detailed design. The Applicant is currently reviewing AWS's standard protective provisions. The Applicant will provide AWS with comments on their provisions in due course, with a view to refining and resolving issues as far as possible.

		to these under Schedule 2 – Requirements within the DCO Order (11) Construction environmental management plan; (12) Operational environmental management plan; (13) Construction traffic management plan; and (18) Decommissioning and restoration.	

Table 2-3: Bedford Group of Drainage Boards

Reference number	Theme	Matter raised	Response
RR-018	General comment	Comment that the Board has engaged with the Applicant and commented on the draft DCO and is satisfied that while the Land Drainage Act would be suspended during construction of the Proposed Development, the Board's interests would be protected and that flood risk would be adequately managed by the Applicant during and after the development phase.	No further comment

Table 2-4: Environment Agency

Reference number	Theme	Matter raised	Response
RR-081	Draft DCO – Discharge of Requirements (Issue ID: EA01)	Request for the Environment Agency to be consulted on Requirements 9 (Drainage) to ensure Impact Drainage plans are appropriately assessed. Suggested wording of the Requirement to include "approved by the relevant planning authority, in consultation with the Environment Agency."	The Applicant will update the **draft DCO [EN010158/APP/3.1.2]** [**AS-010**] at Deadline 1 to add the Environment Agency as a consultee to Requirement 9.
RR-081	Sequential test (Issue ID: EA02)	Comment that the Applicant should clearly demonstrate how sequential approach to the placement of components for the Proposed Development, noting evidence gaps in fluvial flood risk mapping for smaller Ordinary Watercourses, to demonstrate the Proposed Development represents the worst-case likely scenario in terms of flood risk if the placement presented and assessed is only indicative. Specific comments highlight that a sequential approach should be applied to demonstrate construction compounds are placed outside of Flood Zone 3 and the location of the BESS which is adjacent to an Ordinary Watercourse which has no associated Flood Zone mapping.	The Applicant considers that a sequential approach has been applied to the placement of all components of the Proposed Development, with permanent infrastructure located within Flood Zone 1 where possible. Design Commitment E1 in **Design Commitments [EN010158/APP/5.9.2]** [**AS-018**] secures that Construction Compounds would be located outside of Flood Zone 2 and 3 areas. The BESS and Substation areas (considered to be the more vulnerable elements of the Proposed Development) are located within Flood Zone 1 and outside of areas of significant surface water flooding. Additional hydraulic modelling has been undertaken on the East Claydon Brook Tributary to further access the risk in this area and delineate the flood zones and this will be submitted on 10 February 2026.

			Where data gaps in fluvial flood risk exist, the Environment Agency surface water flood risk mapping has been used to assess the risk from the minor ordinary watercourses, and the placement of the more sensitive equipment has avoided these areas shown to be at higher risk from all sources.
RR-081	Flood risk (Issue ID: EA03)	Comment with reference to section 16.10.8 of **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2] [APP-059]** that flood risk to third parties could be increased if the term "slight adverse" is in reference to impacts outside of the Order Limits for the development and the effect of 'slight adverse' and where this occurs should be clarified.	Regarding the term "slight adverse" in Section 16.10.8 of **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2] [APP-059]**, for clarity this terminology currently refers to minor, localised effects within the Order Limits and does not extend to areas beyond the Site. No works are proposed that would materially alter flood flows or storage on third-party land, and the Proposed Development is designed to avoid obstruction of floodplain flow routes. Consequently, there is no credible pathway for increased flood risk to third parties, however the terminology and assessment of "slight adverse" effects does apply to the Study Area and not just the Order Limits.
RR-081	Compensatory Flood Storage (Issue ID: EA04)	Comment that there is a lack of quantitative evidence to support the assessment of floodplain volume losses (e.g., solar panel support column flood risk impact) within the **Flood Risk Assessment** (**ES Volume 4, Appendix 16.1 [EN010158/APP/6.4] [APP-132]**) meaning flood risk may be adversely	The Applicant considers that **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** has appropriately addressed floodplain impacts in a proportionate manner. The proposed Solar PV development comprises widely spaced support columns with a negligible footprint relative to the floodplain area. The solar PV panels would be supported on C

	affected (e.g., the impact of solar panel support frames could be underestimated). Request to provide supporting evidence within the Flood Risk Assessment to quantify the impact of flood storage losses and whether any increase in flood risk is contained on site, including: • the overland flow velocities associated with flooding in areas where solar PV panels are proposed • the volumetric loss of flood storage in the fluvial design flood event (1 in 100 year plus 30% climate change scenario) where solar PV panels are proposed Comment that the assessment should account for both mapped fluvial flood risk and unmapped fluvial flood risk where proxy datasets are being used, with the assessment including potential losses in floodplain for all components proposed within the design flood extent. Additionally, these components within the design flood extent should not inhibit flood flow routes.	section galvanised steel posts driven into the ground which are estimated to be less than 0.5% of the panel area. Based on the design flood event (1 in 100 including allowances for climate change) from all sources, the total area of PV panels in areas at risk of flooding equates to 253,935m^2. Assuming an average depth of flood water of 250mm (considered to be a very conservative assumption given the modelled flood depths and the assumption that the Solar PV would cover 100% of the area and excludes the spacing between the rows of panels), the total volume of displaced water across the site equates to 317.4m^3. which is considered negligible across the whole site area and would not give rise to off-site impacts or increased flood risk. An updated FRA has been issued at Procedural Deadline A with these calculations included. Given the low vulnerability of the Proposed Development, the absence of solid barriers, and the conservative application of freeboard, further quantitative assessment of flow velocities or flood storage volumes is not considered necessary. The use of mapped flood risk and precautionary proxy datasets provides a robust basis for assessment, and the Proposed Development would not inhibit flood flow routes or adversely affect flood risk. The use of proxy datasets, such as the use of the use of the pluvial modelled outputs for minor watercourses

			and small catchments is common practice and accepted as a suitable approach to take for lower risk developments such as the placing of PV panels.
RR-081	Flood risk (Issue ID: EA05)	Comment that it is not clear if any elements of the Proposed Development are within Functional Floodplain (Flood Zone 3b) and this should be clarified, and where possible, avoided for development/appropriate mitigation measures applied with reference to section 5.8.12 of NPS EN-1. Comment that this applies to all components including stockpiles, materials/ laydown areas which should be outside Flood Zone 3 where possible and must be outside of Flood Zone 3b.	No permanent or temporary flood sensitive infrastructure including stockpiles, or laydown areas, are located within the Functional Floodplain (Flood Zone 3b). Where temporary construction activities are required in areas of higher flood risk, such as watercourse crossings these are limited in extent, managed through standard best practice measures, and would not impede floodplain function. The design has been prepared in accordance with NPS EN-1 (Section 5.8.12) (2024), avoiding development in Flood Zone 3b wherever practicable and applying appropriate mitigation to manage residual risk.
RR-081	Fencing (Issue ID: EA06)	Comment that fencing must not inhibit flood flow routes and the proposed fencing should be clarified and assessed to ensure this would not increase flood risk.	The proposed fencing comprises standard post-and-wire or similar designs with widely spaced posts, which do not create a solid barrier and therefore would not obstruct overland flow or flood conveyance. The fencing layout has been designed to follow the proposed site boundary without impeding natural flow paths, and no areas of increased flood risk are anticipated as a result of fencing installation. On this basis, the Applicant considers that the proposed fencing does not require further assessment and would not increase flood risk.

RR-081	Flood Risk Assessment (Issue ID: EA07)	Comment with reference to the 40-year operational (including maintenance) phase of the Proposed Development that a higher central and upper climate change allowance for the 2080s epoch (uplift of +30%) should be used rather than the 2050s epoch for the fluvial hydraulic modelling. Request to provide the updated modelling to the Environment Agency for review. Given the development would constitute nationally significant infrastructure the Applicant should also assess the impact of a credible maximum scenario as a sensitivity test by also applying the +58% climate change allowance or using a suitable proxy. In the context of future flood risk, the Applicant needs to provide more evidence to demonstrate everything other than Solar PV modules is located outside of 1% (1 in 100) annual exceedance probability (AEP) plus climate change flood extent (including that of the smaller catchments). The Applicant should provide a clear map setting out what they are treating as the design flood event across the whole site, particularly for the unmodelled, smaller catchments where they are proposing to use the Risk of Flooding from Surface Water maps as a proxy for fluvial flood risk.	In line with the request within **Post-acceptance Section 51 advice to the applicant [PD-002]**, additional hydraulic modelling has been undertaken with updated hydrology to account for the 30% uplift in climate change and will be submitted in the updated FRA at Procedural Deadline A. The Applicant considers that applying a credible maximum scenario using the upper 2080s climate change allowance (+58%) is not appropriate in this instance. The 2080's epoch is considered to be from 2070 to 2125, in this epoch only the decommissioning phase would take place, which is anticipated to occur within the first 12 months of this epoch. Given the increase in climate change allowances over the three epochs, it is reasonable to assume that the full 58% increase in flows would not occur at the onset of this epoch, and as such the 30% allowance is considered reasonable for the construction, operational (including maintenance) and decommissioning phases of the Proposed Development. As a sensitivity test the variation in flooding between a 1 in 100-year event with 11% and 30% Climate change allowance and the 1 in 1000 data will be considered and any additional appropriate mitigation will be proposed, further clarification will be provided in Section 3.3 of the updated **ES Volume 4, Appendix 16.1: Flood Risk Assessment**

[EN010158/APP/6.4.2] submitted at Procedural Deadline A.

The development located in the areas of flood risk are low-vulnerability, water-compatible infrastructure comprising widely spaced panels with minimal solid structures, which do not obstruct flood flows or introduce sensitive receptors. The **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** already applies conservative measures, including current Flood Zones, the higher central 2080s climate change allowance, and an appropriate allowances of freeboard, providing sufficient resilience to extreme events. Given the negligible floodplain displacement and precautionary design, assessment of a credible maximum scenario would not materially change conclusions on flood risk. Environment Agency guidance on Flood Risk Assessments and Climate Change states that: 'in flood zones 2 or 3a for: Essential infrastructure – use the higher central allowance.' This is 30% for the 2080's epoch and 30% for the 'Upper End' for the 2050's epoch when the operational phase of the development occurs, it is therefore considered that a 30% uplift is considered to be the credible maximum scenario.

Figure 3.4 of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** provides a plan showing the design flood event (Fluvial 1 in 100 +30% climate change and the

			modelled pluvial 1 in 100 + 25% climate change event) as requested.
RR-081	Flood Risk Assessment (Issue ID: EA09)	Comment that the Applicant has used the Risk of Flooding from Surface Water mapping as a proxy for fluvial flood risk which means flood risk from smaller Ordinary Watercourses could be underestimated, as this reflects the central allowance for the 2050s epoch and the methodology uses a direct rainfall approach. Request for the Applicant to provide supporting evidence that the Risk of Flooding from Surface Water mapping is a reasonable or conservative proxy for fluvial flood risk including the effects of climate change. Where the Risk of Flooding from Surface water outputs are being used as a proxy for fluvial flood risk they should be treated as such in the context of freeboard allowances, compensatory storage calculations, and future flood risk. We note that the applicant proposes a solar PV module height of 1800mm above existing ground levels (see Flood Risk Assessment Paragraph 3.10.1, 4.2.1 and 4.5.2) in areas of fluvial risk. This freeboard would also be applicable to other sources of flood risk (e.g. the Risk of Flooding from Surface Water	The Risk of Flooding from Surface Water (RoFSW) mapping (Figure 3.4 of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4]**) has been used to identify areas potentially affected by shallow overland flow paths and localised flooding associated with intense rainfall events. In the absence of detailed hydraulic models for minor Ordinary Watercourses in the vicinity of the Site, the RoFSW outputs provide a precautionary representation of flood extents that, in this location, are equal to or exceed the anticipated floodplain associated with these small watercourses. As such, the RoFSW mapping does not underestimate risk but instead captures a broader range of potential flooding mechanisms, including exceedance, surcharging, and flow routing that may not be fully represented in simplified fluvial assessments. It is noted that the RoFSW mapping reflects the central allowance for the 2050s epoch; however, the methodology incorporates nationally consistent rainfall inputs, conservative assumptions on infiltration, and does not account for site-specific drainage improvements or attenuation measures. This results in an inherently precautionary output, particularly for rural catchments where fluvial responses are typically constrained by channel

	mapping) which are used as a proxy for fluvial flood risk.	capacity and local topography. The Applicant therefore considers the RoFSW mapping to represent a reasonable and, in this case, conservative proxy for flood risk from minor Ordinary Watercourses, including the effects of climate change. Any flood risk deemed to be fluvial in nature, but mapped through the pluvial modelling is noted in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]**. With regard to freeboard and finished levels, the proposed solar PV module lower edge height of 1800mm above existing ground levels provides a substantial margin above the predicted flood depths from both fluvial and surface water sources. This freeboard significantly exceeds standard allowances typically applied to such low-vulnerability infrastructure and ensures resilience to residual risks, including climate change uncertainty and modelling limitations. The Applicant confirms that freeboard has been applied consistently where RoFSW outputs have been referenced as a proxy for fluvial flood risk. In respect of compensatory storage, the nature of the development comprising ground-mounted Solar PV infrastructure with limited displacement of floodplain storage means that there is no material loss of flood storage volume. Consequently, the reliance on RoFSW extents does not result in an

			underestimation of compensatory storage requirements or future flood risk.
RR-081	Pluvial flood risk (Issue ID: EA09)	Comment that there are uncertainties with pluvial modelling and pluvial and fluvial model files should be submitted to the Environment Agency for review to ensure flood risk is accurately assessed.	The approach adopted by the Applicant within the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** is considered appropriate and proportionate to the scale, vulnerability, and nature of the Proposed Development. The **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** includes detailed fluvial and pluvial hydraulic models to define site-specific flood extents and mitigation where appropriate. These files can be made available to the Environment Agency for review.
RR-081	Credible maximum scenario (Issue ID: EA10)	Request for clarification regarding the credible maximum scenario for fluvial and pluvial, and for the upper climate change allowance for the 2080s epoch (+58%) (or suitable proxy) to be considered when assessing impacts for a credible maximum scenario.	The Applicant considers that applying a credible maximum scenario using the upper 2080s climate change allowance (+58%) is not appropriate in this instance. The 2080's epoch is considered to be from 2070 to 2125, in this epoch only the decommissioning phase will take place, which is anticipated to occur within the first 12 months of this epoch. Given the increase in climate change allowances over the three epochs, it is reasonable to assume that the full 58% increase in flows would not occur at the onset of this epoch, and as such the 30% allowance is considered reasonable for the construction, operational (including maintenance) and decommissioning phases of the Proposed

Development. As a sensitivity test the variation in flooding between a 1 in 100-year event with 11% and 30% Climate change allowance and the 1 in 1000 data will be considered and any additional appropriate mitigation will be proposed, further clarification will be provided in Section 3.3 of the updated **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** submitted at Procedural Deadline A.

The Environment Agency's climate change guidance entitled 'Flood risk assessments: climate change allowances' states: 'if you develop NSIPs you may need to assess the flood risk from a credible maximum climate change scenario. Check the relevant national policy statement.' The purpose of the assessment of the credible maximum climate change scenario is to understand the sensitivity of the Proposed Development and inform the approach to climate change adaptation over its lifetime.

The guidance recommends this is a 'sensitivity test' and goes on to recommend an 'adaptative approach' to allow for additional or revised mitigation measures over the lifetime of the development. In relation to the 'adaptive approach' the guidance notes that 'some measures to manage flood risk are not necessary now but may be in the future'. With respect to climate change adaptation, Overarching NPS for Energy (EN-1) paragraph

			4.10.15 notes that in respect to of the design of new energy infrastructure critical to its operation necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime to adapt to 'more radical changes to the climate' (the credible maximum climate change scenario). A 30% climate change allowance for modelled fluvial events and the 100-year RoFSW mapping has been used as the 'design event' to inform location of development and mitigation measures, as this proportionately reflects the period during which the Proposed Development would be present and exposed to flood risk. The proxy credible maximum allowances have been considered to understand the minimal scale of change and to inform an adaptive approach to mitigation.
RR-081	BESS drainage design (Issue ID: EA11)	Comment that there is insufficient detail and inconsistent information across the Application about the BESS drainage design and firewater management, which is needed to determine acceptability of proposed mitigation measures to reduce risk of contaminated firewater. Further information is requested from the Applicant, including:	The indicative design to supply the fire water to inform the Environmental Statement includes several large water tanks, which provide sufficient water storage over and above the 4-hour minimum amount that is currently required by the National Fire Chief Council Guidance (NFCC guidance). As detailed in the **Outline BSMP [EN010158/APP/7.9] [APP-145]**, water for firefighting would be brought to site by tanker or bowser and stored in dedicated tanks. This has been discussed with Buckinghamshire and Milton

- Confirmation of the proposed source of water for firefighting including refilling storage tanks.
- How the Applicant would manage the accumulation of silt and pollutants within the base of the permeable compacted gravel proposed to be used for the surface of the BESS compound, including contaminants from a fire event.
- Confirmation how spent firefighting water would be captured and placed into storage tanks and how these would be cleaned.
- How the storage tanks would be connected to the wider BESS drainage system and whether this would involve an underground attenuation tank, bunded holding lagoons, or attenuation storage pond due to different examples being used across the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline BSMP [EN010158/APP/7.9] [APP-145]**.
- Clarification on role of proposed attenuation ponds associated with the BESS adjacent to, or underlain by, superficial Alluvium (secondary A aquifer), associated with a surface water

Keynes Fire Authority as recorded in **Statement of Common Ground - Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]**.

As set out in the **Outline BSMP [EN010158/APP/7.9] [APP-145]**, the BESS drainage system would be designed to isolate and contain such flows to prevent pollution of the surrounding environment. This is anticipated to be achieved using a permeable surface around the battery unit areas, which is underlain by an aggregate subbase lined with an impermeable membrane or a functionally equivalent alternative. Outfalls from the BESS surface water drainage system would have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal. These would be subject to regular maintenance and these requirements will be updated within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** for submission at Deadline 1. Following a fire event, retained water would be tested by the Operator. If contaminated (polluted), the water would be removed from site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential

feature as shown in **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]** and information on how contaminants in firewater captured in the ponds would not directly impact surface water and groundwater.

- Confirmation about systems in place to contain firewater runoff and monitoring of the [underground] attenuation tank to ensure it is maintained and does not leak and is large enough, as well as information on how tanks and ponds would be emptied and testing specifications which would be utilised.
- Confirmation that the drainage system would have automatic and manual isolation systems as only the automated penstock system is mentioned in the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**.
- Update section 6.4.2 of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** to replace 'restricted' to 'prevented' in line with ref. 217 of the **Commitments Register [EN010158/APP/6.4] [APP-076]**.

source of firefighting water by re-filling the water tanks.

This approach ensures that environmental protection is maintained under both normal and emergency conditions. The tanks would be maintained and cleaned at regular intervals with any silt collected also tested and transported offsite if required. Following a fire event, the aggregate subbase would be evaluated for contamination and reinstated to maintain the integrity of the site's drainage infrastructure. In the event of a fire, the gravel proposed for use as the sub-base of the BESS compound must be tested and replaced if found to be contaminated. Details of the testing and replacement procedures would be included in the detailed Battery Safety Management Plan. UK accredited labs would be used for water testing.

The entire filter drainage network, including catchpits and manholes, would be restored. An example approach to firewater drainage may be underground attenuation tanks, which would likely fill up with the potentially polluted water and would also be reinstated, where required. All contaminated materials would be disposed of safely by a licences waste carrier. More detailed methodology would be determined at detailed design stage. Measures would be taken to ensure sufficient storage capacity is provided to accommodate rainfall volumes after

- Confirmation how commitments ref. 222 and 223 within the **Commitments Register [EN010158/APP/6.4] [APP-076]** would be achieved without monitoring, and query whether the securing mechanism for 222 should include the Drainage Strategy and BSMP.
- Further detail to be provided within the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** and **Outline BSMP [EN010158/APP/7.9] [APP-145]** to satisfy ref. 223.
- Further detail on the biannual maintenance programme for the BESS which should include testing of fire prevention and extinguishing measures.
- Comment that there is no discussion of BESS maintenance in the **Outline OEMP [EN010158/APP/7.3] [APP-139]**, contrary to section 5.12.3 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**.
- Confirmation about ongoing protection of BESS sites while decommissioning proceeds within the **Outline DEMP [EN010158/APP/7.4] [APP-140]**, as firewater capture should be in place until the BESS has been removed.

firefighting activities and prior to the resumption of drainage discharge.

Section 6.4.2 of the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** will be updated at Deadline 1 to replace 'restricted' to 'prevented' in line with ref. 217 of the **Commitments Register [EN010158/APP/6.4] [APP-076],** as requested.

The proposed attenuation ponds to the south of the BESS are specifically intended for onsite surface water management. These ponds would attenuate runoff, providing sufficient capacity to manage flows for up to 1 in 100-year event, including allowances for climate change. The ponds would be designed in line with The SuDS Manual (CIRIA C753), enhancing water quality for runoff generated from hard-standing and gravelled areas. The ponds may also provide biodiversity benefits to enhance the local fauna and flora. Controlled discharge rate from the ponds would be into the ordinary watercourse located further south. It should be noted that these attenuation ponds are not intended for use in fire water management; instead, they are designated solely for normal operational circumstances of the BESS.

This follows the management plan process as detailed in "Protocol for the disposal of contaminated water and associated wastes at incidents 2018" jointly issued by the Environment

Agency, Northern Ireland Environment Agency, Water UK and Chief Fire Officers Association. Further discussions would take place between the Applicant and the Environment Agency ahead of construction to agree the conditions and concentration limits of contaminants once the chemistry of the BESS units are procured and further understood. Until the specific Battery composition is understood at detailed design stage the limits for disposal cannot be determined. This will be reviewed and confirmed with the Environment Agency prior to construction.

Further detail on the firewater and drainage design, including the proposal for the containerisation of firewater is set out within section 6 of the **Outline BSMP [EN010158/APP/7.9]** [APP-145] which has been submitted as part of the DCO Application.

The securing mechanism for 222 within the **Commitments Register [EN010158/APP/6.4]** [APP-076] will be updated at Deadline 1 to include the Outline Drainage Strategy and Outline BSMP reference. Ref. 223 of the **Commitments Register [EN010158/APP/6.4]** [APP-076] states the following: *Ensure that any firewater is collected, preventing release to land or groundwater.*

The measures within the **Outline OEMP [EN010158/APP/7.3]** [APP-139] and **Outline DEMP [EN010158/APP/7.4]** [APP-140], alongside

the **Outline BSMP [EN010158/APP/7.9] [APP-145]** ensure that during any incidents that occur relating to thermal runaway at the BESS, any runoff water would be contained and managed to prevent damage to the wider environment, including the groundwater.

Maintenance would likely be undertaken on the BESS equipment twice a year although this is dependent on final BESS that is procured. Depending on the BESS system chosen the requirements would vary but all maintenance would be carried out in accordance with the detailed Operational Environmental Management Plan and the suppliers' requirements. This would be included within the detail design of the systems and the final Operation and Maintenance Manual.

Section 5.12.3 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]** will be updated at Deadline 1 to remove the reference to the **Outline OEMP [EN010158/APP/7.3] [APP-139]** referring to BESS maintenance and instead the Outline BSMP will be updated to include maintenance requirements.

The **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be updated at Deadline 1 to confirm the process of how BESS site protection for firewater segregation will be handled during decommissioning.

RR-081	Cable removal (Issue ID: EA12)	Comment that potential removal of cables should be considered at detailed design stage to ensure effective and sensitive removal remains viable in case this is required at the time of decommissioning.	During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks would be removed to a depth of up to 1m. It is currently anticipated that all the below-ground cables below 1m would be left in situ, however, this would be dependent upon the legislation and industry standards at the time of decommissioning (see sections 2.3.4 to 2.3.6 of the **Outline DEMP [EN010158/APP/7.4] [APP-140]**). It is not anticipated that the cables that are left in situ below 1m buried underground would cause any contamination. Where cables would be installed below environmentally and ecologically sensitive areas, ducts would be installed to protect the replanting areas above the cable runs. This would ensure that if the cables needed to be removed, they could be removed quickly and with low impact to vegetation growing above the cable ducts.
RR-081	Cable removal (Issue ID: EA12)	Comment that there is no supporting evidence to confirm that where cables are left in situ at decommissioning, there would be no contamination effects and/or interaction with groundwater.	The Proposed Development would be decommissioned in accordance with the **Outline DEMP [EN010158/APP/7.4] [APP-140].** As detailed in this Plan, cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would

be unlikely to be considered as waste if left in the ground.

The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development.

However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the **Outline DEMP [EN010158/APP/7.4] [APP-140]** that the approach would be confirmed at the time of decommissioning, based on government policy and best practice. Sections 2.3.4 to 2.3.6 of the **Outline DEMP [EN010158/APP/7.4] [APP-140]** indicate that:

"During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m. All the below-ground cables below 1m will be left in situ, however, this will be dependent upon the legislation and industry standards at the time of decommissioning.

This approach reflects common practice for Electricity Distribution Network Operators infrastructure (such as substations) and the associated export cables. It is not anticipated that

			the cables that are left in situ below 1m buried underground would cause any contamination. *The Site will be reinstated in accordance with any approved detailed Decommissioning Environmental Management Plan(s). The detailed Decommissioning Environmental Management Plan (s) will be subject to the approval of the local planning authority at the time of decommissioning."*
RR-081	Effluent management (Issue ID: EA13)	Comment that details on effluent management from on-site temporary and permanent welfare facilities should be provided to avoid unacceptable pollution impacts.	As outlined in the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**, there are three options for foul drainage strategy during the operational phase for permanent works, Option 1 – discharging to the foul sewer network, Option 2- discharging to a designed packaged treatment plant located on site and then subsequent discharge to local watercourse network, Option 3, stored in onsite cesspits that are managed and drained by a licensed carrier. The cesspits would either meet the general binding rules for the operation of a cesspit or the Environment Agency would be consulted to obtain a permit for the operation of the cesspits. All options would be reviewed, and the preferred option would be outlined at detailed design stage with the updated Drainage Design. All options would ensure that there are no unacceptable pollution impacts. 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. Both options would be reviewed, and the preferred option would be outlined at detailed design stage through the updated drainage design. Both options would ensure that there are no unacceptable pollution impacts. The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** will be updated at Deadline 1 to include further details of the foul drainage options.
RR-081	Study area (Issue ID: EA14)	Comment that the Envirocheck report supplied in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]** should be reviewed and the statement: "no significant pollution incidents within or close to the Site have been recorded in the last 20 years" in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** amended with reference to the 1km study area used in the Chapter.	The sentence indicating that 'no significant pollution incidents within or close to the Site have been recorded in the last 20 years' should have clarified that this related to controlled waters. Therefore, Section 11.5.22 within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** should read: '*No significant pollution incidents affecting controlled waters have been recorded within or close to the Site in the last 20 years, based on the information provided in the Envirocheck report that covers the Order Limits and the study area (see **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment***

[EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]).'

This will be amended at Deadline 1.

With reference to substantiated pollution incident register entries (which may affect water, land or air), these were not specifically summarised within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]**. However, it is confirmed that there are no recorded substantiated pollution incident register entries for Parcel 1a, Parcel 2, Parcel 3, the Interconnecting Cable Corridor land between Parcels 1 and 2 and the Interconnecting Cable Corridor land between Parcels 2 and 3. Parcel 1 has no entries within the Order Limits, with five entries outside the Order Limits but within the study area. These relate to an incident involving landfill odour (located 201m to the south-west of the Order Limits, occurring in 2007); an incident involving heavy metals (located 506m to the north-west of the Order Limits, occurring in 2020) and three further incidents relating to landfill odour in 2007, at distances of 557m, 715m and 850m from the Order Limits.

These were not detailed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]**, as they were not considered to be of significant concern. However, it is hoped that the correction provided above clarifies the situation with respect to the comment about 'no significant

			pollution incidents' relating specifically to incidents concerning controlled waters, as subdivided within the Environmental Database Report (provided as **Appendix A** of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4]** [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]).
RR-081	Foot and mouth burial sites (Issue ID: EA15)	Request for foot and mouth burial sites present within the Zone of Influence to be identified, with mitigation proposed if necessary, as detail is currently insufficient.	The Applicant has been previously advised by the Animal and Plant Health Agency that there is no official register of animal burial sites within the Zone of Influence as detailed in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054]. Mitigation measures have been incorporated into Table 3.6 of the **Outline CEMP [EN010158/APP/7.2]** [APP-138] to detail actions that should be taken in the event of encountering such features. Further details will be provided in the **Outline CEMP [EN010158/APP/7.2]** [APP-138] that will be submitted at Deadline 1.
RR-081	Contaminant concentrations (Issue ID: EA16)	Comment that there is insufficient evidence to support the statement "contaminant concentrations expected to be substantially below any screening levels due to a lack of presence of pollutants, including: • lack of data about groundwater presence or contaminant levels • insufficient ground investigation works	This comment was included in Section 11.10.2 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054], in relation to assessing the magnitude of impact with respect to potential contamination. An assessment of existing laboratory results has yet to be undertaken, and this would be completed on receipt of ground investigation results from the full phase of works.

• invalidity of chemical testing data • lack of ground gas and groundwater monitoring Request for additional ground investigation with risks to groundwater included in the scope to address data gaps and for the EA to be consulted on any monitoring relating to potential contamination of land or groundwater.	The assessment provided in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** was based on the information available from the baseline study. However, it should be noted that the assessment is prepared on the assumption that mitigation measures would have been completed. This would include any agreed remediation works associated with any identified contamination. Therefore, regardless of whether contamination is present or not at the current time, remediation and validation works would have been completed (in accordance with the requirements of Buckinghamshire Council, and the Environment Agency, where appropriate, and as secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138]**), therefore at the point at which the Proposed Development construction works commence, this statement would be true. With respect to points 1 to 4, it is noted that a complete ground investigation has yet to be undertaken. The scope of work for the full investigation will be agreed in advance with Buckinghamshire Council, and the Environment Agency and this will include further locations for intrusive works, groundwater monitoring, laboratory analysis of soil and groundwater samples, and ground gas and groundwater monitoring (if required/agreed).

RR-081	Errors and omissions within the PRA (Issue ID: EA16)	Comments on errors and omissions within the **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]**, including: • Drawing 70096495-206 (sheets 1 to 3), the site layout does not match that used in the main report or Appendix 11.1. The yellow polygon on each sheet is not defined in the legend. "Possible area of Made Ground associated with line of former railway" clearly extends beyond the area marked on the drawings. • Drawing 70096495-206 (sheets 1 to 3) shows more exploratory holes than are listed in section 3.2. It is not clear which were advanced, and which were removed from the scope. It not clear which locations prefixed "TP/WS" were trial pits, and which were window samples. The colours used in the drawings, in combination with location name prefixes, do not appear consistent with the technologies identified in the legend. • Appendix A: Location references do not match Appendix 11.3 Drawing 70096495-206 (sheets 1 to 3), no comment on the absence of groundwater is recorded on any hand pit log, HP019 was "abandoned	**ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120] [APP-121] [APP-122] [APP-123]** will be updated to reflect the comments and reissued at Deadline 1.

		due to water ingress" but water level is not recorded on the log, all hand pit locations appear to have been backfilled with topsoil and not arisings and the reason for this is not given. There is no confirmation that the topsoil tested to be chemically and geotechnically suitable: imported topsoil could be more permeable than existing soils. • Appendix B: There is at least one duplicate photograph, with different captions indicating they are from different locations (e.g. Photograph 2 and Photograph 3). Water appears to be present in the photograph for WS013 (PDF page 146), but the log says none encountered. Sand over clay was recorded I this location, so perched groundwater is possible • Appendix F: Sample holding times were exceeded for all samples. Results for PAH and Cyanide tests cannot be used.	
RR-081	Finemere Wood SSSI (Issue ID: EA17)	Comment that **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2]** [APP-059] signposts to further discussion of Finemere Wood SSSI as a Groundwater Dependent Terrestrial Ecosystem in **Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054] but Finemere Wood is not	The Applicant notes that an assessment of potential effects on the Groundwater Dependent Terrestrial Ecosystem at Finemere Wood SSSI were not included in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054]. An update to this chapter will be submitted at Deadline 1, to incorporate the requested assessment, which

		mentioned in Chapter 11. Request for the Applicant to provide details about Finemere Wood SSSI as a GWDTE and assessment of potential effects from the Proposed Development.	will be carried out in line with the agreed methodology for a groundwater receptor.
RR-081	Existing wells (Issue ID: EA18)	Comment that existing wells shown on OS mapping have not been adequately investigated or assessed, which could lead to potential risk to existing water abstractions within the site.	The measures incorporated into the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** would protect all groundwater resources from adverse effects, including any potable or non-potable water supply locations such as existing wells. The Applicant has reviewed data relating to groundwater abstractions from the environmental database search and identified these features as far as possible. However, the measures secured in the management plans for the protection of groundwater apply across the entire Site, and would be protective of any groundwater abstraction point, even if this is not specifically listed as such in the available dataset. The protection of groundwater (including any associated groundwater abstraction points, regardless of whether their location/existence is known or unknown) is achieved by preventing accidental release of contamination (for example by management of fuels or chemicals to prevent spillage) and by having procedures in place to manage actions in the event of encountering unexpected contamination (these

			measures, along with others, are included in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**).
RR-081	Water assessment (Issue ID: EA19)	Comment that the summary of assessment **ES Volume 2 Chapter 16: Water [EN010158/APP/6.2] [APP-059]** does not include fuel and chemical management or firewater drainage during operation, and information about how these matters have been addressed is requested.	The Proposed Development is a ground-mounted Solar PV farm, which does not involve operational fuel storage or significant chemical use. Any minor chemicals (e.g., for maintenance of machinery or vegetation control) would be managed in accordance with standard pollution prevention measures outlined in the **Outline OEMP [EN010158/APP/7.3] [APP-139]**. Fire water drainage during operation is considered in the **Outline Battery Safety Management Plan [EN010158/APP/7.9] [APP-145].**
RR-081	Commitments Register (Issue ID: EA20)	Comment that there is no monitoring proposed for Ref. 220 of the **Commitments Register [EN010158/APP/6.4] [APP-076]** and therefore it is not clear how this would be achieved.	If remediation works are required, any remediation actions and associated groundwater or ground gas monitoring would need to be agreed in response to the situation that has been encountered and cannot be defined in advance. The scope of remediation work and associated monitoring of ground gas or groundwater would be agreed by Buckinghamshire Council and the Environment Agency, as defined by measures set out in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**. The **Commitments Register [EN010158/APP/6.4]**

			[APP-076] will be amended at Deadline 1 to clarity this, as discussed with the Environment Agency.
RR-081	Proposed mitigation measures (Issue ID: EA21)	Comments on mitigation measures (general) for land and groundwater detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** including: • More detail is needed on measures to avoid impacts where concrete is used for trenches and foundations, such as how concrete spillages and surpluses would be managed, and what monitoring would be put in place. • Groundwater and ground gas monitoring should be included as part of the proposed ground investigation. • Mitigation measures for construction impacts require more detail, including monitoring requirements and responsibility.	The Applicant has responded to each point below: • This detail would be presented within the appropriate detailed management plan once further detail is available. This would be derived from the information already presented in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, but would ensure that the approach takes consideration of and complies with regulations at the time the work is undertaken. • The actions to be undertaken in the event that existing unexpected contamination is encountered (or a contamination incident occurs) during works are detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**. • If remediation works are required, any remediation actions and associated groundwater or ground gas monitoring would need to be agreed in response to the situation that has been encountered, and it will not be possible to define them in advance. The scope of remediation work and associated monitoring would be agreed by Buckinghamshire Council and the Environment

			Agency, as defined within the management plans detailed above. • This would be presented within the appropriate detailed management plan. This would be derived from the information already presented in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, but would ensure that the approach takes consideration of and complies with regulations at the time the work is undertaken. As noted above (Part 2), monitoring works cannot be determined without knowledge of what issue (if any) requires remediation.
RR-081	Proposed mitigation measures (Issue ID: EA21)	Comments on mitigation measures outlined in the contamination of soil/groundwater sections of the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** including: • Monitoring requirements and responsibility should be included. • Water pollution: stockpiles of contaminated materials may also need to be covered, or stored in a suitable container, to prevent leaching of contaminants (or dust, etc.). Specification for testing and assessment of	The Applicant has responded to the points raised in order below: • **[APP-138],** The Applicant has committed to undertaking remediation and validation work relating to any identified contamination, both in advance of works commencing (after results of the ground investigation have been assessed), and if any unexpected contamination is identified during works (or if a contamination incident occurs as a result of works). The ground investigation is secured within the **Outline CEMP [EN010158/APP/7.2] [APP-138]** (the scope of which will be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120]**

potentially contaminated water needs to be given.

- Drip trays or equivalent should be used for refuelling for all plant, not just mobile plant to prevent impacts to soil or groundwater.
- Use and storage of hazardous materials/substances: designated concrete washout areas should be sealed to prevent loss of fluid to ground or water.
- Site set up, groundwork and construction: "Disposal" of surplus material could be a waste operation which should comply with relevant waste legislation, and this should be added into the Outline CEMP with reference to CL:AIRE DoW:CoP.
- Site set up, groundwork and construction: further information is required on proposed settlement pond before this is agreed e.g. whether ponds will have impermeable a lining, what type of contamination is anticipated, and what measures would need to be in place to permit release to drainage system.
- Site set up, groundwork and construction: the Applicant should specify what happens to this water used for wheel washing or vehicle washdown.

[APP-121] [APP-122] [APP-123] and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**). The actions to be undertaken in the event that existing unexpected contamination is encountered (or a contamination incident occurs) during works are detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**.

- If remediation works are required, any subsequent remediation and associated monitoring would need to be agreed specific to the situation that has been encountered, and cannot be defined in advance. The scope of remediation work and associated monitoring would be agreed by Buckinghamshire Council (and the Environment Agency, where appropriate), as defined within the management plans detailed above.

- **Point 2:** If stockpiles of contaminated material are required to be stored on-site, these would either be suitably covered, or stored within appropriate sealed containers, to ensure there is no spreading of contaminants via leaching or dust generation. If contaminated material is identified and requires removal, the handling methodology will be agreed in advance with the

	• Spillages and Leaks: more detail is needed on how impacts from spillages to ground would be mitigated, e.g. containment and assessment timescales for any such incidents, and how downward mitigation of contamination into the ground would be avoided. • Spillages and Leaks: Suggestion for the following measures in the event of discovery of unexpected contamination. –(1) No further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the LPA, and where necessary, the EA, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the EA. –(2) Where remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by	Local Planning Authority as part of the remedial strategy. The **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be amended and submitted at Deadline 1 to include these requirements. • **Point 2**: The specification for testing and assessment of potentially contaminated water cannot be determined in advance, as it will be agreed once a specific issue has been identified, with the specification varying depending on the contamination that is present. In all instances, the scope of analysis would be agreed in advance with the Local Planning Authority after potential contamination has been identified and prior to any analysis being undertaken. The **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be amended at Deadline 1 to include these requirements. • **Point 3:** Text will be amended changed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]** to reflect that drip trays or equivalent are required for all plant refuelling, not just refuelling

	the LPA, following consultation with the EA. –(3) Remediation must be carried out in accordance with the approved scheme. – (4) Following the implementation of the remediation strategy, a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the LPA and the EA.	of mobile plant and this will be submitted at Deadline 1. • **Point 4:** Regarding the use and storage of hazardous materials/substances, the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]** will be amended at Deadline 1 to indicate that designated concrete washout areas should be sealed to prevent loss of fluid to ground or water. • **Point 5:** The **Outline CEMP [EN010158/APP/7.2] [APP-138]** will be amended at Deadline 1 to note that disposal of surplus material (if necessary) could be a waste operation, in which case it should comply with relevant waste legislation (reference is made to the CL:AIRE DoW:CoP). • **Point 6:** If a settlement pond is required specifically to deal with any encountered contamination, the requirements for this would need to be determined based on the type of contamination identified during the incident. This cannot therefore be defined in advance, and would need to be agreed with Buckinghamshire Council and the Environment Agency at the time that its need is identified. It is also noted that any such operations would be managed, inspected and drained (as appropriate) by a licensed carrier

who would then dispose of the waste/foul water discharge offsite . The option of provision of a settlement pond, or as an alternative, off-site removal of waste water, would be reviewed if a contaminant source of this type is identified. Either option will ensure that there are no unacceptable pollution impacts to groundwater (or other receptors) as a result of the Proposed Development.

- **Point 7:** The final provision for containing wheel wash water or vehicle washdown water would be determined at the detailed design stage of the Proposed Development, and such information would be confirmed in the detailed environmental management plans. If wheel wash facilities are supplied as self-contained units, these would be managed by a contractor to ensure that they are emptied when necessary, and that any waste/foul water is removed from site where necessary.
- **Point 8:** Spillage kits will be held on-site, as dictated by requirements within the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]**.
  - Immediate actions to be taken in the event of an incident will be provided within the emergency procedures in the above management plans. Use of spillage kits would remove as much of the

			contaminant as possible from the surface of ground, or from water, reducing the potential for it to migrate into deeper soils or groundwater. Containment and assessment timescales for any such incidents would need to be determined on a case-by-case basis, and these details will be confirmed by an appropriate person, as detailed within the relevant management plan. • **Point 9:** The **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]** will be amended at Deadline 1 to include the requested requirements relating to spillages and leaks.
RR-081	Proposed mitigation measures (Issue ID: EA21)	Comments on mitigation measures outlined in the changes to land drainage sections of the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]** including: • Monitoring requirements and responsibility should be included. • Request for more detail about how mitigation measures would prevent damage to the quality of groundwater or	• **Point 1:** The Applicant has committed to undertaking remediation and validation work relating to any identified contamination, both in advance of works commencing (after results of the ground investigation have been assessed), and if any unexpected contamination is identified during works (or if a contamination incident occurs as a result of works). The ground investigation is secured within the **Outline CEMP [EN010158/APP/7.2] [APP-138],** (the scope of which would be designed based on the findings of **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4] [APP-119] [APP-120]**

minimise the potential impacts of levels and flow directions.

- Proposed mitigation measures in the Outline DEMP do not address "changes to land drainage as a result of piling activities…" included in the Potential Impact column.

[APP-121] [APP-122] [APP-123] and the information from **ES Volume 4, Appendix 11.3: Ground Investigation Report [EN010158/APP/6.4] [APP-125]**). The actions to be undertaken in the event that existing unexpected contamination is encountered (or a contamination incident occurs) during works are detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**.

- If remediation works are required, any subsequent remediation and associated monitoring would need to be agreed specific to the situation that has been encountered, and cannot be defined in advance. The scope of remediation work and associated monitoring would be agreed by Buckinghamshire Council, and the Environment Agency, where appropriate, as defined within the management plans detailed above.

- **Point 2:** A number of mitigation measures incorporated in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139] and Outline DEMP [EN010158/APP/7.4] [APP-140]** are protective of the groundwater in terms of reducing any potential effects on groundwater quality, and reducing potential effects on the

existing groundwater flow regime (the quantity and flow direction of groundwater). In terms of groundwater quality, all mitigation measures relating to prevention of contamination would ensure that any impact on groundwater quality is minimised. This includes mitigation measures for preventing release of accidental contamination (measures for controlling storage and use of fuels, oils or chemicals, including re-fuelling activities), as well as emergency response procedures to follow in the event of a pollution incident occurring. There is also an emergency response procedure for ensuring effects from encountering any unexpected existing contamination are minimised.

- In terms of minimising effects on the groundwater quantity or flow regime, this would be achieved by following mitigation measures to protect soil quality, and minimise damage to existing soil drainage. If existing field drainage is maintained as far as possible (or repaired, should any noticeable damage occur), and the general situation is maintained in terms of current run-off or infiltration of precipitation, then changes to the groundwater regime in terms of amount of groundwater present and direction of water flow would be minimally affected by the Proposed Development.

			• **Point 3:** Piling activities, if any, would all be undertaken during the construction phase of the Proposed Development. The construction element of piling works is considered within the **Outline CEMP [EN010158/APP/7.2] [APP-138]**. Ongoing impacts on receptors due to the presence of piles (post-construction) are considered during the operation (including maintenance) phase of the Proposed Development, within the **Outline OEMP [EN010158/APP/7.3] [APP-139]**. The piles would be removed from the ground during decommissioning, and were therefore not specifically considered within the **Outline DEMP [EN010158/APP/7.4] [APP-140]**. However, the Applicant agrees that comments relating to the effects on land drainage during operation would equally apply during the decommissioning phase, until such a point as all piles have been removed, therefore this section from the **Outline OEMP [EN010158/APP/7.3] [APP-139]** has now been duplicated within the **Outline DEMP [EN010158/APP/7.4] [APP-140]**.
RR-081	HDD fluid breakout (Issue ID: EA22)	Comment that the HDD Fluid Breakout Plan should be referenced in mitigation for land, groundwater and water of the **Outline CEMP [EN010158/APP/7.2] [APP-138]** to	The **Outline CEMP [EN010158/APP/7.2] [APP-138]** will be updated at Deadline 1 to reference the HDD Fluid Breakout Plan in Table 3.6 and Table 3.9.

		prevent HDD fluid breakout being overlooked.	
RR-081	Disposal of batteries (Issue ID: EA23)	Comment that there is insufficient information about handling of waste batteries, noting these are managed under The Waste Batteries and Accumulators Regulations 2009 and not as WEEE.	The Outline Site Waste Management Plan (at Appendix 1 of the **Outline CEMP [EN010158/APP/7.2]** [APP-138]) will be updated at Deadline 1 to reference the management and handling of waste batteries under The Waste Batteries and Accumulators Regulations 2009 and include further detail on the handling of waste batteries.
RR-081	BNG Assessment (Issue ID: EA24)	Request for confirmation that direct impacts to watercourse are reflected in the biodiversity metric. Specific example given that the **BNG Assessment** (**ES Volume 3, Appendix 7.17 [EN010158/APP/6.4]** [APP-103] does not reflect direct impacts upon Claydon Brook and Tributary in the scenario that a culvert may be constructed. Request to provide BNG metric spreadsheet and a means of cross-referencing data with plans and assessment of condition/ encroachment pre-and post-development. Where reduced encroachment is relied upon, this should be reflected within the LEMP. Request that LEMP plans identify the 10m offset proposed for watercourses and that this will be secured for Muxwell Brook.	No culvert or bridge construction has been included in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** [APP-103]. This reflects the plans which the assessment was based on. This would be included, if needed, at detailed design stage, once locations are confirmed. The Biodiversity Net Gain (BNG) metric includes a reference number in the 'Habitat reference number' column which correspond with the RSK ID numbers on the figures within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** [APP-103] which allows the tracking of habitat parcels from baseline through to the post construction scenario. The **Outline LEMP [EN010158/APP/7.6]** [APP-142] includes the commitment to 10m offsets from all watercourses including the Muxwell Brook to reduce riparian encroachment.

		Comment that Annex C within the **BNG Assessment** (**ES Volume 3, Appendix 7.17 [EN010158/APP/6.4] [APP-103]** is missing information regarding Aquatic habitats post development condition assumptions.	Annex C within **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** does not include post-development condition assessments for watercourses as no new watercourse is being created. For enhanced watercourses, no change in condition is proposed with the enhancement being achieved through a reduction in encroachment as stated in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103].** Annex C within **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** does include post-development condition assessments for the proposed new ponds to be created, as this is the only newly created wetland habitat proposed.
RR-081	Invasive non-native species (INNS) (Issue ID: EA25)	Comment that further detail about presence of INNS is needed, with further detail on biodiversity procedures suggested in the CEMP and INNS management in the LEMP e.g. pre-construction survey, protocols for working near water, mitigation of risks associated with landscaping measures.	It is noted from the Environment Agency that anecdotal evidence of signal crayfish was found along parts of the Claydon Brook and that New Zealand Pigmy Weed was present within one of the ponds surveyed, however this was located outside of the Order Limits. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** will be updated at Deadline 1 to clarify that these invasive non-native species are indeed present but this does not change the conclusions reached. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** contains a commitment to produce an Invasive

			Non Native species (INNS) biosecurity protocol and the final scope of this will be presented in the detailed Construction Environmental Management Plan. Likewise the **Outline LEMP [EN010158/APP/7.6] [APP-142]** gives a commitment to preconstruction surveys to ensure no additional INNS have become established, the scope of this will be included in the detailed Landscape and Ecological Management Plan. Note that as per Requirements 7 and 11 of the **draft DCO [EN010158/APP/3.1.2] [AS-010]**, the detailed CEMP and LEMP must be approved by the relevant planning authority in consultation with the Environment Agency (and Natural England for the detailed LEMP).
RR-081	Status of waterbodies (Issue ID: EA26)	Request to assess the effects of the AIL track and access crossing (including construction) on the Claydon Brook/Claydon Brook (DS Granborough) with respect to sediment movement as well as water/flood flows, with request to use of an open span bridge with setback abutments rather than installing culverts.	Following ongoing engagement with the Environment Agency, the Applicant can confirm that the proposed crossing of Claydon Brook will involve the installation of a bridge. This bridge would be designed to maintain existing watercourse function and flood conveyance while minimising environmental and hydraulic impacts The access crossing is of limited width and extent and is located at a point where the channel is well-defined and confined by existing banks. The proposed bridge would be sized to accommodate the design flow, including an appropriate allowance for climate change, and will be designed to maintain conveyance and avoid increases in flood risk both

			upstream and downstream. Hydraulic capacity checks demonstrate that the crossing would not result in afflux, increased flood levels, or impediments to overbank flow during flood events. With regard to sediment movement, the crossing would be installed in alignment with the existing channel invert, ensuring continuity of bed levels and sediment transport processes. Standard design measures, including appropriate inlet and outlet detailing, erosion protection, and temporary construction-phase controls, would be implemented to prevent scour, sediment deposition, or mobilisation during construction, operation and decommissioning. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** will secure measures to manage sediment control, pollution prevention, and working methods in proximity to the watercourse.
RR-081	PFAS (Issue ID: EA27)	Confirmation should be provided whether materials used in the solar PV have any PFAS risk.	The vast majority of ground-mounted Solar PV projects are based on Glass/Glass panels, as their reliability and lifespan are far superior. As these panels have no backsheet, they are not expected to contain PFAS in the laminate. Some ARC (anti-reflective coatings) can contain low amounts of PFAS but they are generally not used in the coating of new solar panels. The procurement process for the Proposed Development has not yet begun so the specific panel makeup is not known. However, the Applicant has stringent procurement processes

			in place to ensure high quality and tested equipment is used for the Proposed Development. During the operational life of each solar panel, maintenance operations would ensure that no chemicals or heavy metals would be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **Outline OEMP [EN010158/APP/7.3] [APP-139]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment. With faulty, damaged or end-of-life assets, a key method to reducing the risk of chemical impacts is to ensure they are removed and disposed of responsibly. The **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** also secure the approach to the recycling of Waste Electrical and Electronic Equipment (WEEE). All waste to be removed from the Order Limits would be undertaken by fully licensed waste carriers and taken to licensed waste facilities for recycling or disposal and managed in line with the requirements applicable at the time.
RR-081	Monitoring (Issue ID: EA28)	Request that the Applicant commits to a monitoring regime, including taking water samples, within the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and	The **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be updated at Deadline 1 to include the requirement for a 12-month post-construction monitoring regime. Further details of the monitoring

		Outline DEMP [EN010158/APP/7.4] [APP-140] above site walkovers which should include details of frequency, quantity, location and method of monitoring from the pre-construction phase through to decommissioning.	regime would be set out at detailed design stage and in agreement with the Environment Agency and Buckinghamshire Council.
RR-081	Foul water (Issue ID: EA29)	Request for further detail in the foul water disposal strategy over the lifetime of the Proposed Development including welfare facilities and status of cesspits to minimise risk to water quality.	**ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP- 046]** provides outline information on foul water drainage. The nearest foul sewer assets appear to be located outside of the Order Limits, along Orchard Way in Botolph Claydon. It is located approximately 700m north of the BESS area and 2km east of the edge of Parcel 1, as such, a connection to the foul network may not be feasible. Welfare facilities during construction, operation (including maintenance) and decommissioning have limited potential to put an increased demand on the local foul water network, as foul water generated in these areas would be transported off-site for disposal or consideration would be given to the use of a package treatment works that would be located within the 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). Any foul water storage and discharge (including welfare facilities and cesspits) would be designed in line with the latest guidance to ensure suitable retention on site limiting the potential risk to water quality.
RR-081	Surface water (Issue ID: EA30)	Comment that there are limited mitigation measures within respect to water quality outlined in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** to protect surface water quality, and it should be clarified that mitigation measures relating to groundwater will also protect surface water quality.	The **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be updated at Deadline 1 to clarify that the mitigation measures proposed will also protect surface water quality.
RR-081	Wheel washing (Issue ID: EA31)	Comment that suitable strategies should be detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** for the management of water used for wheel washing, if water is utilised. Suggestions for inclusion: • Ensure it is undertaken within a designated impermeable or lined area and should not be allowed to discharge	The **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** will be updated at Deadline 1 to include the provision of either water wheel washing or 'dry brush' wheel washing. If water wheel washing is undertaken, the following measures would be implemented: • Ensure it is undertaken within a contained designated impermeable or lined area and should not be allowed to discharge into a watercourse or infiltrate to groundwater.

		into a watercourse or infiltrate to groundwater. • Any SuDS incorporated around wheel washing facilities should provide sufficient treatment for suspended solids, metals and hydrocarbons. • The site of wheel washing facilities should be a minimum of 10m from top of bank of watercourses. • Provide an explanation of how wheel wash water will be contained and disposed of.	• The site of wheel washing facilities should be a minimum of 10m from top of bank of watercourses.
RR-081	Use of concrete Surface water (Issue ID: EA32)	Comment that the CEMP should be developed to ensure that risks of pollution as a result of concrete are managed, with reference to elements of the Proposed Development which would have concrete foundations. Suggestions for inclusion: • Identify all areas where concrete works are proposed, and specify whether any of these will be cast in situ or precast and delivered • For in situ concrete pours, suggest timing, weather conditions, and runoff control. • Describe containment measures for concrete washout.	As outlined in the **Outline CEMP [EN010158/APP/7.2]** [APP-138], mitigation measures have been suggested to limit the potential environmental impacts of concrete works within the Proposed Development. These include measures such as: • Any concrete mixing stations must have protective bunds constructed around them to ensure containment of resulting debris or contaminants. • The use of recycled aggregates, where appropriate, for foundations, subbases, hard-standings and pavement materials.

			• Weather forecasts to be monitored on a daily basis. Forecasts would be used to inform the sequencing of activities. • Concrete wash-out onsite shall only be permitted when the Principal Contractor has provided a designated, suitably prepared wash-out area with signage identifying the area as suitable for wagon wash-out. • Concrete wash-out may be dried and crushed to be re-used on Site or disposed of in accordance with a Site Waste Management Plan. The location and detail of the concrete works and the form that they would take would be provided at detailed design stage and at this stage the CEMP would be updated to reflect the current stage of design and specific contamination measures and controls that may be required.
RR-081	Mitigation measures (Issue ID: EA33)	Request for sections 2.13.3 of the **Outline OEMP [EN010158/APP/7.3]** [APP-139] and 2.12.4 of the **Outline DEMP [EN010158/APP/7.4]** [APP-140] to be updated in line with 2.16.3 of the **Outline CEMP [EN010158/APP/7.2]** [APP-138] which recognises that mitigation outlined within the **Outline BSMP [EN010158/APP/7.9]** [APP-145] will prevent	The **Outline OEMP [EN010158/APP/7.3]** [APP-139] and **Outline DEMP [EN010158/APP/7.4]** [APP-140] will be updated at Deadline 1 to align with the wording in 2.16.3 of the **Outline CEMP [EN010158/APP/7.2]** [APP-138] which recognises that the **Outline BSMP [EN010158/APP/7.9]** [APP-145] will also prevent the risk of contamination associated with the firewater.

		the risk of contamination associated with firewater.	
RR-081	Transformers (Issue ID: EA34)	Request for the type of transformers (e.g. dry-type transformers) to be used to be provided in order to understand associated fire risk and therefore ensure mitigation measures are appropriate for firewater and surface water runoff.	The detailed transformer information is unavailable at this time and wouldn't be specified until detailed design stage to retain flexibility. Conservative parameters have been assumed within the current concept design. The pollution drainage strategy is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147],** which includes containment around transformers (perimeter bunds and impermeable base under each of the transformers), provision of a separate oily drainage infrastructure with oil interceptors, emergency shut-off systems and monitoring provision. Transformers would be interspersed amongst the Solar PV modules alongside either String Inverters or Central Inverters and Combiner Boxes and Switchgear, either outside as Independent Outdoor Equipment, or inside a containerised ITS. Parameters secured for the transformers can be found within the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. Further detail on pollution prevention will be detailed in the **Outline CEMP [EN010158/APP/7.2] [APP-138]** that will be submitted at Deadline 1. The transformer types will be specified in accordance with IEC 60076-2 with sealed bunding capable of containing 110% of transformer oil

			by volume to align with normal practice within the industry.
RR-081	Surfacing of compounds (Issue ID: EA35)	Request for confirmation through the **Outline OEMP [EN010158/APP/7.3]** [APP-139] and **Outline BSMP [EN010158/APP/7.9]** [APP-145] that the surface of the BESS and Substation compounds would have impermeable lining in order to reduce contamination risks from firewater, and that any gravel within the compounds would be cleaned or replaced in the event of a fire event.	This comment has also been addressed as part of the response to Issue ID EA11. The **Outline BSMP [EN010158/APP/7.9]** [APP-145] and **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. The BESS area may require the installation of an impermeable membrane across the part of the area where batteries are concentrated to manage fire water during fire event, more detail is contained within the **Outline BSMP [EN010158/APP/7.9]** [APP-145]. Detailed design of the fire water containment systems (including final specification of isolation controls, attenuation capacity, containment and discharge management) for the BESS and Rosefield Substation would be developed at a later stage as part of the detailed drainage design in accordance with the site-specific Emergency Response Plan and detailed design risk assessments using safe by design principles. Suitable arrangements would be implemented to ensure that contamination risks from firewater are prevented, and no path exists between potential sources of contamination and sensitive receptors.

RR-081	Penstock valves (Issue ID: EA36)	Request for confirmation that penstock valves would be automated (set in the off position when fire suppression is are activated) with a manual override for the substation as well as the BESS, with a maintenance programme in place.	Outfalls from the BESS drainage system would have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal. Following a fire event, retained water would be tested by the Operator. If contaminated (polluted), the water would be removed from site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential source of firefighting water by re-filling the water tanks. This approach ensures that environmental protection is maintained under both normal and emergency conditions. At the substation, the transformer types would be specified in accordance with IEC 60076-2 with sealed bunding capable of containing 110% of transformer oil by volume to align with normal practice within the industry. This would ensure that any contamination risk would be prevented from entering the surface water drainage system. The **Outline Battery Safety Management Plan [EN010158/APP/7.9] [APP-145]** will be amended at Deadline 1 to provide further detail on the maintenance schedule in place for the automatic or manual penstocks.

RR-081	Damage to panels and BESS (Issue ID: EA37)	Request for the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline BSMP [EN010158/APP/7.9] [APP-145]** to explain how damaged/degraded BESS units or solar PV modules would be safely removed, stored and taken off-site to prevent contamination to the water environment, with offsite disposal written into the Site Waste Management Plan where relevant.	The Outline Site Waste Management Plan, which forms **Appendix 1** to the **Outline CEMP [EN010158/APP/7.2] [APP-138]** sets out the measures for managing and safely disposing of damaged and degraded BESS units / solar PV modules. The measures set out within this Plan will form a basis for the Site Waste Management Plan that would be produced prior to the operational phase and would be updated to reflect the circumstances prevailing during the period in which operational and maintenance activities are to be carried out. This is set out and secured in the **Outline OEMP [EN010158/APP/7.3] [APP-139]**.
RR-081	Firewater testing (Issue ID: EA38)	Comment that details of firewater testing should be included in the **Outline BSMP [EN010158/APP/7.9] [APP-145],** with information about how it would be determined whether firewater would be removed or retained	The measures within the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**, alongside the **Outline BSMP [EN010158/APP/7.9] [APP-145]** ensure that during any thermal runaway events at the BESS, runoff water would be contained and managed to prevent damage to the wider environment, including the groundwater. The detailed design would incorporate sufficient storage volume for firewater to ensure that there is no accidental release to the wider environment. The confirmed method of how fire water would be tested and the criteria for release would be included within the final documentation during detailed design and would conform to the appropriate legislation in force at the time. Until the HV

			equipment has been procured and the chemical makeup is understood then the method and criteria can't be detailed. This would be included within the detailed Battery Safety Management Plan prior to construction.
RR-081	BESS pollution (Issue ID: EA39)	Comment that the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline BSMP [EN010158/APP/7.9] [APP-145]** should recognise the risk of leakage from the BESS and ensure this is considered separately from fire risk.	The comment is unclear what is meant by 'leakage' but if the 'leakage' is relating to the potential leakage of coolant within the BESS system then this would be reviewed at the detailed design stage when the BESS system has been specified. The BESS would be subject to regular maintenance and monitoring with emergency measures in place to control any pollution and spills in accordance with the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline CEMP [EN010158/APP/7.2] [APP-138]**. The reference that is provided in the Environment Agency's comment refers to section 16.8.16 within the Environmental Statement which is referring to damaged PV panels and not damaged BESS. The Applicant does not expect any chemical release from the BESS in the normal operational environment and the BESS would be maintained regularly in line with supplier recommendations and the O&M manual.
RR-081	Firewater (Issue ID: EA40)	Comment that Table 3.6 of the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and the **Outline DEMP [EN010158/APP/7.4] [APP-140]** should reference the impact of	The measures within the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**,

		firewater associated with both the BESS and substation, with monitoring requirements.	alongside the **Outline BSMP [EN010158/APP/7.9] [APP-145]** ensure that during any incidents that occur relating to fires at the BESS, any runoff water would be contained and managed to prevent damage to the wider environment, including the groundwater. The detailed design would incorporate sufficient storage volume for firewater to ensure that there is no accidental release to the wider environment. The confirmed method of how fire water would be monitored and tested and the criteria for release would be included within the final documentation during detailed design and would conform to the appropriate legislation in force at the time.
RR-081	Hazardous and polluting substances (Issue ID: EA41)	Request for more detail in the OEMP and BSMP of the hazardous and polluting substances anticipated to be present within substation plant and equipment, including transformer type, and the design and operational measures to contain these substances.	The Proposed Development would be continually monitored for any damage to panels, and other infrastructure including the substation plant and equipment with emergency measures in place to control any pollution spills as secured in the **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline OEMP [EN010158/APP/7.3] [APP-139]**. Further detail on the transformer types and substances would be confirmed within the detailed Construction Environmental Management Plan following detailed design. The **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** outlines details of pollution control measures proposed for the substation, including containment around

			transformers (perimeter bunds and impermeable base under each of the transformers), provision of a separate oily drainage infrastructure with oil interceptors, emergency shut-off systems and monitoring provision. Indicative location of transformers and proposed measures are shown in a drawing included in **Annex E – Outline Drainage Strategy Drawings and Cross Section.**
RR-081	WFD Assessment (Issue ID: EA42)	Comment that **ES, Volume 4: Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4] [APP-133]** should include impacts from physical modifications from works to alter the course of watercourses and impacts from foul water and where necessary, mitigation measures.	The purpose of the Stage 1 Screening Assessment is to identify whether the Proposed Development has the potential to cause deterioration in WFD status or prevent the achievement of WFD objectives, rather than to provide a detailed design-level assessment of individual construction activities. No permanent alterations to the course, alignment, or morphology of any watercourse are proposed as part of the development. Where works are required in proximity to watercourses, these are limited in scale and duration and are designed to retain the existing channel form, bed, and banks. As such, the Proposed Development does not constitute a physical modification that would affect WFD hydro-morphological quality elements or result in deterioration of waterbody status. On this basis, impacts associated with altering the course of watercourses are not considered applicable to the Stage 1 Screening Assessment.

RR-081	Draft DCO	Comment that the Proposed Development does not require a flood risk activity permit, and therefore reference should be removed from the **draft DCO [EN010158/APP/3.1.2] [AS-010]**, with advice that the Applicant should seek ordinary watercourse consent from the LLFA.	The Buckingham and River Ouzel Internal Drainage Board (IDB) provides ordinary watercourse consent for the area of the Proposed Development. The Applicant has received confirmation from Buckingham and River Ouzel IDB of the disapplication of ordinary watercourse consent, which is reflected in Article 6 of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**.
RR-081	Flood modelling	Comment that JFLOW national scale modelling for Flood Zones was updated in March 2025 which has improved the digital terrain model and design flow estimates used in the modelling.	The Applicant notes the update to the Environment Agency's national-scale JFLOW modelling for Flood Zones in March 2025. However, the Flood Risk Assessment was prepared using the best available datasets at the time of assessment submission and in accordance with the relevant planning and technical guidance then in force. The national Flood Zone mapping derived from JFLOW is intended to provide a strategic, screening-level indication of flood risk rather than a site-specific assessment. While improvements to the digital terrain model and design flow estimates are welcomed, such updates do not automatically imply a material change in flood risk at the site scale, particularly in the absence of published evidence demonstrating a change in Flood Zone extents affecting the Proposed Development. Where appropriate detailed hydraulic modelling has been carried out on the Claydon Brook Tributary

			which offers a more detailed approach than the national scaled modelling.
RR-081	Water crossings	Comment that any temporary bridges should be designed such that their soffit level is above the 1% (1 in 100) annual exceedance probability (AEP) water level with a freeboard allowance of +600mm and for permanent crossings these should be designed such that their soffit level is above the 1% (1 in 100 annual exceedance probability (AEP) plus the higher central climate change allowance with a 600mm allowance for freeboard.	Following ongoing engagement with the EA, the Applicant can confirm that the proposed crossing of Claydon Brook would involve the installation of a bridge. This bridge would be designed to maintain existing watercourse function and flood conveyance while minimising environmental and hydraulic impacts. Any temporary structures would be removed following construction with the watercourse reinstated. The bridge specification would be confirmed at detailed design stage.
RR-081	Contamination source	Comment that section 11.8.5 of **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054]** which states operational contamination sources does not include contamination from infrastructure, including firewater.	It is acknowledged that potential contamination from infrastructure (including firewater) is not specifically mentioned in **Section 11.8.5** of **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2] [APP-054.** However, the additional mitigation sections relating to the operational phase (including maintenance) (Sections 11.9.5 to 11.9.7) do reference managing the potential environmental impacts from firewater. This is also covered in the **Outline OEMP [EN010158/APP/7.3] [APP-139]** (see pages 36 and 37).

RR-081	WFD Groundwater Bodies	Comment that section 4.11.2 of **ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.2]** [APP-133] states that there are no WFD Groundwater Bodies within the immediate vicinity of the Order Limits but Figure 4.2 clearly shows Headington Corallian WFD groundwater body within the 1km buffer area, and this should be clarified (though the water body can be scoped out).	It is acknowledged that the Corallian WFD groundwater body is located with the 1km buffer of the Order Limits and noted that the water body can be scoped out. No further amendments to the assessment are therefore required.
RR-081	Site waste management plans	Comment that separate site waste management plans for each phase of the Proposed Development may be required, and the approach to append the operational phase to the **Outline CEMP [EN010158/APP/7.2]** [APP-138] may not be appropriate.	The Outline Site Waste Management Plan, which forms Appendix 1 to the **Outline CEMP [EN010158/APP/7.2]** [APP-138] would form a basis for the Site Waste Management Plan that would be produced prior to the operational phase and would be updated to reflect the circumstances prevailing during the period in which operational and maintenance activities and decommissioning activities are to be carried out. This is set out and secured in the **Outline OEMP [EN010158/APP/7.3]** [APP-139] and **Outline DEMP [EN010158/APP/7.4]** [APP-140]. This is a standard protocol for Solar DCO's and ensures that there is flexibility for the Outline Site Waste Management Plan to be amended prior to each phase of the Proposed Development.

RR-081	CIRIA SuDS Manual	Comment that CIRIA SuDS Manual is not referenced in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]**, **ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4] [APP-133]** or **Outline CEMP [EN010158/APP/7.2] [APP-138].**	Reference to the SuDs Manual is made within the relevant documents including in **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4] [APP-132]** and **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**.
RR-081	Temporary drainage strategy	Comment that **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2] [APP-059]** suggests a temporary drainage strategy would be implemented during construction works to control runoff rates and sediment mobilisation, however the **Outline CEMP [EN010158/APP/7.2] [APP-138]** contains limited details of this strategy.	Further detail on the drainage strategy would be provided in the Drainage Strategy and detailed Construction Environmental Management plan following detailed design.
RR-081	Herbicide use	Request that any herbicide use is referenced in the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]** and/or **Outline DEMP [EN010158/APP/7.4] [APP-140]** as necessary, with measures detailed to ensure no herbicides are able to enter watercourses and reduce water quality.	The use of herbicides is referenced and would be managed through measures detailed in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** which covers the construction, operation (including maintenance) and decommissioning phases. Further detail would be included in the detailed Landscape and Ecological Management Plan following detailed design. This includes measures to avoid herbicides entering the watercourse and reducing water quality, for example, maintaining at least a 10m buffer from all ditches, ponds and

watercourses. This approach is in line with other similar projects.

Table 2-5: Historic England

Reference number	Theme	Matter raised	Response
RR-109	Scheduled Monument of the 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 (NHLE 1405586)	Agreement with the Applicant's assessment that the harm to the significance of the Scheduled Monument of the 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 would be less than substantial.	The Applicant is pleased to have reached agreement with Historic England regarding the effects on this Scheduled Monument and this will be captured within the draft Statement of Common Ground intended to be submitted at Deadline 1.
RR-109	Scheduled Monument of the Deserted	Agreement with the Applicant's assessment that the harm to the significance of the Scheduled Monument of the Deserted village	The Applicant is pleased to have reached agreement with Historic England regarding the effects on this Scheduled Monument and this will be

	village (site of) at Fulbrook Farm (NHLE 1006939)	(site of) at Fulbrook Farm would be less than substantial.	captured within the draft Statement of Common Ground intended to be submitted at Deadline 1.
RR-109	Claydon House (Grade I; NHLE 1288461)	Broad agreement with the Applicant's assessment of impacts to Claydon House (e less than substantial and at a low level), noting its request for views from the upper floors of Claydon House has not been fulfilled which would have allowed confirmation of potential impacts.	The Applicant notes the broad agreement regarding the assessment of impacts and considers that the use of the 3D model and reference to the existing photomontages within **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-115] [APP-116] [APP-117] [APP-118] has adequately informed the assessment. However, the Applicant is seeking access to the upper floors of Claydon House in order to provide the requested views and will continue to liaise with Historic England and The National Trust on this matter.
RR-109	Church of All Saints (Grade I; NHLE 1214762)	Agreement with the Applicant's assessment that the harm to significance for Church of All Saints would be less than substantial and operational effects would be negligible.	The Applicant is pleased to have reached agreement with Historic England regarding the effects on this Listed Building and this will be captured within the draft Statement of Common Ground intended to be submitted at Deadline 1.
RR-109	Middle Claydon Conservation Area	Agreement with the Applicant's assessment that potential impacts to the Middle Claydon Conservation Area would be less than substantial.	The Applicant is pleased to have reached agreement with Historic England regarding the effects on this Conservation Area and this will be captured within the draft Statement of Common Ground intended to be submitted at Deadline 1.
RR-109	Botolph Claydon	Agreement with the Applicant's assessment that potential impacts to the Botolph Claydon	The Applicant is pleased to have reached agreement with Historic England regarding the

	Conservation Area	Conservation Area would be less than substantial.	effects on this Conservation Area and this will be captured within the draft Statement of Common Ground intended to be submitted at Deadline 1.

Table 2-6: Ministry of Defence, Safeguarding Department Defence Infrastructure Organisation

Reference number	Theme	Matter raised	Response
RR-191	No objection	Comment that following a review of the application documents at the date of submission, the Proposed Development would be considered to have no detrimental impact on the operation or capability of a Defence site or asset. The MOD, therefore, has no objection to the Proposed Development subject to no further amendments being made.	This is noted and agreed. The Applicant thanks the Ministry of Defence, Safeguarding Department Defence Infrastructure Organisation for its engagement to date.

Table 2-7: National Grid Electricity Distribution (East Midlands) plc

Reference number	Theme	Matter raised	Response
RR-200	Existing utilities	Comment that the Order Limits includes land in or upon which NGED may have assets and it is currently reviewing the draft Order to establish any affected apparatus and interests it may have. This will ensure there would not be a detrimental impact on NGED's electricity network and its duties	The Applicant has engaged with NGED to seek to agree protective provisions which would be included in the DCO. NGED have provided the Applicant with a copy of its standard protective provisions, which the Applicant has reviewed and provided comments on. Negotiations are continuing to progress positively, and the Applicant will continue to work

		under the EA 1989. Comment that NGED is lodging the representation as a holding objection until an asset protection arrangement has been agreed between NGED and the Applicant, at which time it will withdraw the objection.	with NGED to refine and resolve any outstanding issues.

Table 2-8: National Grid Electricity Transmission Plc

Reference number	Theme	Matter raised	Response
RR-201	Interaction with future NGET assets	Comment that the proposed Order Limits overlap with land required for the siting of planned future NGET infrastructure across plots 6/13, 7/3, 7/9, 7/11 and 7/12 where plots 7/9 and 7/12 (as shown within **Land Plans [EN010158/APP/2.2.2]** [AS-005]) contain existing NGET infrastructure that would require reconfiguration. Further comment is made that plots 7/1, 7/2,7/4, 7/5, 7/6, 7/7 and 7/8 have been included within the Order Limits for the purposes of Work No. 6 (Grid Connection works to connect into the substation) where plots 7/1, 7/2 , 7/4 and 7/5 wholly include the area which is very likely to facilitate the replacement East Claydon Substation.	The Applicant recognises that the Order Limits overlap with land containing existing NGET infrastructure, as well as land required for the siting of planned future NGET infrastructure. The future NGET infrastructure would enable the Proposed Development to connect into the national grid electricity system, via the National Grid East Claydon Substation, together with other planned energy developments in the area. As set out in Paragraph 3.1.5 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** [APP-046], the "*final location and timing of the works have not been confirmed by NGET at this stage and so the Proposed Development includes flexibility to account for a connection into either the existing substation or NGET's preferred location for the replacement substation*". Land rights are sought on a similar

			basis, as set out in Paragraph 2.6.2 of the **Statement of Reasons [EN010158/APP/4.1.2]** [**AS-014**]. The Grid Connection Cable Corridor would extend from the Rosefield Substation as directly as practicable to the National Grid East Claydon Substation and would be tailored to accommodate NGET's East Claydon Project. The Applicant is actively engaging with NGET on a regular basis to manage the technical interfaces between the projects, and negotiation of protective provisions is ongoing. The Applicant has also offered NGET the option of entering into a separate cooperation/collaboration and/or interface agreement if this would further aid the development of an optimal interface between the Proposed Development and NGET's project.
RR-201	Interaction with future NGET assets	Comment that, for plots 7/1, 7/2, 7/4 and 7/5, the Applicant is seeking permanent rights over this land.	As above.
RR-201	Existing NGET Apparatus	Comments confirming that the extent of planned future NGET infrastructure works will include: • The East Claydon Project which will see the rebuilding and replacement of the 400kV and 132kV substations; and • The reconfiguration of existing overhead lines.	The Applicant confirms understanding of NGET's proposals for planned infrastructure works and the two parties are actively engaging on a regular basis to manage the technical interfaces between the projects.

		Further comment confirming the role of the "Replacement Substation" and that it will need to be closely located to the operational substation to allow for the smooth transfer capacity.	
RR-201	Interaction with future NGET assets	Comment confirming that engagements with the Applicant from May 2024 onwards have allowed NGET to voice concerns to the Applicant with regard for the Proposed Development's interface with NGET's current and planned infrastructure. Comment that the Proposed Development would detrimentally impact NGET's ability to deliver The East Claydon Project and associated reconfiguration of overhead lines; particularly line routes 4ZL, 4YH and 4YJ which would likely be reconfigured in plots 7/9 and 7/12 of the **Land Plans [EN010158/APP/2.2.2] [AS-005]** for which the Applicant is seeking the permanent acquisition of freehold ownership.	The Applicant notes this comment and welcomes the early and ongoing engagements with NGET to manage the technical interfaces between the projects. At this stage, and after further engagement with the Applicant, NGET consider that appropriate clearances and prescribed easements together with an agreed form of protective provisions can deliver a solution - provided these are in a form acceptable to NGET (see NGET's **Response to Procedural Decision letter dated 9 January 2026 [AS-037]**). The Applicant is confident that the Proposed Development would not detrimentally impact upon NGET's ability to deliver the East Claydon Project and the reconfiguration of existing overhead lines. Ongoing collaborative engagements between the parties is seeking a designed resolution that works for both projects. The Applicant has confirmed, in writing and through meetings with NGET, that the DCO Application contains sufficient flexibility for the final siting of the infrastructure to ensure that, regardless of NGET's final design for the East

			Claydon Project, the Proposed Development would be deliverable around NGET's infrastructure works. By designing the Proposed Development around NGET's works, any perceived or actual conflicts across all phases of the development of the two projects would be removed. The Applicant reconfirms that this approach would not jeopardise the deliverability of the Proposed Development.
RR-201	Interaction with future NGET assets	Comment of objection to the DCO Application's proposal for development within plots 7/9 and 7/12 and further comment that the Applicant should seek alternative sites to these plots to allow NGET to undertake the reconfiguration works to overhead lines here.	At this stage, and after further engagement with the Applicant, NGET consider that appropriate clearances and prescribed easements together with an agreed form of protective provisions can deliver a solution - provided these are in a form acceptable to NGET (see NGET's **Response to Procedural Decision letter dated 9 January 2026 [AS-037]**). There is therefore no need for the Applicant to seek alternative sites since the Proposed Development is sufficiently flexible to be designed around NGET's works.
RR-201	Protective provisions	Comment that NGET has a statutory duty to meet its statutory obligations which extends to its ability to deliver, operate and maintain current and future infrastructure. NGET therefore requires the appropriate protections be afforded to them with regard for the DCO Application.	The Applicant recognises the statutory duties of NGET in maintaining and delivering existing and future infrastructure respectively. The Applicant has provided comments on the relevant protective provisions and is actively engaging with NGET on a regular basis to manage

		NGET requests further discussion with the Applicant to ensure their established rights of access are not restricted, through the inclusion of suitable protective provisions. This request extends to consideration of the anticipated future assets. Further comment is made that NGET are awaiting comment from the Applicant with regard to the relevant protective provisions.	the technical interfaces between the projects. The negotiation of protective provisions is ongoing.
RR-201	Protective provisions	Comment that NGET's consent needs to be a pre-condition to any occupation of land afforded to the Proposed Development to ensure interests and/or rights to land are compatible between any made DCO and NGET's existing and future assets.	The requirement for NGET consent in order to secure land interests for the delivery of a scheme is a standard term in NGET protective provisions. The parties are engaged in discussions of protective provisions and the Applicant will include those provisions as an additional part to Schedule 15 of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**. The approach is collaborative to effectively manage the land and technical interfaces between the projects. This working approach will ensure that any interests and/or rights to land required by the Applicant are compatible with the needs of NGET.
RR-201	Interaction with existing and future NGET assets	Comment that NGET are committed to cooperation with the Applicant of the DCO Application and that NGET does not hold an in-principle objection to the DCO Application.	The Applicant welcomes NGET's confirmation of the scope of their objection, as this has provided the Applicant and NGET with a clear pathway to resolution.

	Instead, NGET object to the inclusion and seeking of rights over the above identified plots as these are considered critical to NGET's ability to deliver The East Claydon Project and associated reconfiguration of overhead lines. Further comment that NGET are concerned with ensuring the correct processes are followed to ensure the successful retention of their access and asset protection rights both for the successful management of their existing and planned future infrastructure which requires coordination between NGET and the Applicant.	As noted in the Applicant's above responses, the Applicant is actively engaging with NGET on a regular basis to manage the technical interfaces between the projects, and negotiation of protective provisions is ongoing. The Applicant is confident it can agree an appropriate resolution with NGET to ensure the effective delivery of both projects.

Table 2-9: National Highways

Reference number	Theme	Matter raised	Response
RR-202	General comment	Comment that the approach and assumptions within **ES Volume 2, Chapter 15: Traffic and Transport [EN010158/APP/6.2]** [APP-058] is generally acceptable.	The Applicant agrees with this comment and thanks National Highways for its engagement on the Proposed Development to date.
RR-202	Impact on the SRN	Comment that there is the potential for impacts on M40, M1 and A34 during construction but there is unlikely to be impacts following completion of this phase	The Applicant agrees with this comment, relating to the construction phase traffic impact.

		and it is understood the Proposed Development does not require any direct access from the SRN.	
RR-202	Impact on junctions	Comment that junction impact assessments should be undertaken on junctions experiencing an increase of 30 additional trips during peak periods which peak daily construction traffic figures are in excess of this e.g. M40 J9. Further detail regarding impact during the peak hours should be provided to confirm if further assessment is needed.	The traffic generation (in relation to the Proposed Development) affecting the SRN is provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. The level of traffic on the SRN throughout a typical day would be 30 cars/LGV and 32 HGV per day. This level of traffic is well below assessment thresholds (10% traffic impact) and as such no further information is considered necessary. The thresholds for undertaking junction assessments are not met by the Proposed Development.
RR-202	Enforcement	Comment that a monitoring regime and measures to ensure HGV and construction worker movements are distributed outside of traditional peak hours can be accommodated and enforced if persistent breachers occur.	These measures are included as part of the traffic management requirements detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. The detailed Construction Traffic Management Plan would be provided to the Principal Contractor and they would be required to abide by these regulations as part of their commercial contract with the Applicant. Failure to follow the traffic management measures proposed would be a non-compliance matter and could result in contractors being subject to penalties and individual sanctions. Failure to observe the Construction Traffic Management Plan would also be a breach of the DCO.

RR-202	AIL	Comment that the AIL route strategy for the Proposed Development has not yet been agreed with National Highways, and that it follows a government Water Preferred Policy which means it expects the loads to arrive via the nearest suitable port of entry, noting AILs are currently proposed to be routed via the M1.	A full application will be made in line with the relevant policy when the point of origin of the AIL is confirmed by the equipment supplier.

Table 2-10: Natural England

Reference number	Theme	Matter raised	Response
RR-203	Internationally designated sites	Agreement with the conclusions within **Habitats Regulations Assessment: No Significant Effects Report [EN010158/APP/5.3] [APP-033]** that there are no Likely Significant Effects on internationally designated sites resulting from the Proposed Development alone or in-combination with other plans or projects.	The Applicant notes this comment and thanks Natural England for its engagement on the Proposed Development to date.
RR-203	Nationally designated sites	Comment that the ES has fully considered impacts to existing SSSIs scoped into assessment as well as (where possible) the proposed Bernwood SSSI and appropriately characterised the importance of the Bechstein's bat population, their sensitivity, and the potential impacts from the project.	The Applicant notes this comment and thanks Natural England for its engagement on the Proposed Development to date.

		Agreement that potential direct and indirect impacts to the interest features of the SSSIs have been appropriately assessed, and with the conclusion that there are no residual impacts (after mitigation) on SSSIs.	
RR-203	Bat species assemblage – impact pathways	Comments that there are scientific studies which shows that solar farms can physically impact bats, with recent studies suggesting an adverse impact through avoidance and foraging.	The available scientific literature has informed the assessment **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** which has reviewed the available evidence. In addition, this information has influenced the design of the Proposed Development with mitigation focused on ensuring that should displacement occur, bats could still forage across the wider landscape.
RR-203	Bat species assemblage – impact pathways	Comment that the Proposed Development would result in significant changes to current land management practice, with cattle grazing supporting significant invertebrate populations which are a forage resource for Bechstein's bat, noting sheep are not an ecologically equivalent grazer. *Recommendation (4): Greater commitment to the use of cattle will help to ensure that the habitats within the mitigation areas continue to support a wide invertebrate assemblage.*	It is proposed that grazing with cattle is undertaken on the 93ha of mitigation area set aside with no Solar PV panels as the importance of cattle dung to foraging bats is acknowledged. However, it is also proposed to graze underneath Solar PV panels with sheep. The scientific literature indicates that sheep droppings although not supporting the same invertebrate assemblage as cattle dung, do support invertebrates of value to foraging bat species. So, this measure is also likely to increase the biomass of potential bat prey. Information on sheep dung and bats will be presented in a Technical Note which will be submitted at Deadline 1.

RR-203	Bat species assemblage – impact pathways	Comment that there may be direct impacts during the construction of the Proposed Development through disturbance to bats and their roosts.	Disturbance may come about through noise, light or an increase in human presence, particularly at night; these sources are often conflated. Additional sources of lighting and human presence at night can be controlled through restrictions on working hours. With respect to noise, until recently, most measurements of noise were undertaken to determine impacts on human receptors rather than bats. Such measurements are typically 'weighted' to reflect the relative loudness of sounds as perceived by the human ear rather than unweighted noise levels. 'A-weighted' data (represented as dBA) emphasise sounds inaudible to bats whilst under-representing those audible to bats. However, there is increasing awareness of the need to use unweighted measurements and examples of such unweighted data are now available within the Bat Mitigation Guidelines[4]. These guidelines also provide a template for noise assessments. At Deadline 1, the Applicant will present an assessment of the risk of disturbance from construction noise generated by elements of the Proposed Development (using a template which has been accepted by Natural England in licence applications) in a Technical Note. This also

[4] Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

			summarises a high-frequency unweighted noise study carried out at an operational solar farm. In summary: neither construction nor operation are considered to represent a significant source of noise disturbance; however, some pre-construction assessments may be required depending on haul route layout and programme. For the most part, as disturbance is unlikely, even for the low threshold of disturbance for offences which derive from domestic legislation, a licence is unlikely to be required. In the absence of a licence, a Precautionary Working Method Statement will be produced and secured via the **Outline CEMP [EN010158/APP/7.2] [APP-138].**
RR-203	Bat species assemblage – bat survey and field parcel analysis	Comment that survey data collected to inform the Proposed Development is lacking for field parcels B7 to B10 including: lack of transect route in field B7, minimal static detector locations. There is further uncertainty over the robustness of survey data for this part of the site, as Paired Static Bat Detector Survey Report shows an average of 95 barbastelle passes per night in this hedgerow location north of Sheephouse Wood (October 2024), compared to just one barbastelle registration overall when this similar location was sampled once in October 2022. Likewise, in October 2022 an average of 1.55	Bat activity surveys were not undertaken within some fields due to health and safety risks associated with cattle - and the fact that the cattle would have damaged the recording equipment (the Applicant was not able to remove cattle from the field which in any case may have influenced the results). However, the report published by Natural England to support the Bernwood SSSI designation (The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) clearly indicates that these fields form part of the core sustenance zone for Bechstein's bats. Therefore, it is already known these areas are important for foraging bats and **ES**

	registrations of all bat species per hour were reported, compared to an average of 281 bat registrations per night reported for the hedgerow detector deployed for the paired sampling in 2024 (assumed to equate to approx. 20 registrations per hour given a night length of 14 hours). However, there is currently some uncertainty over the accuracy of the barbastelle identification from acoustic data, and the paired sampling reporting has made no comparison or contextual interpretation between the data obtained in 2022 and that in 2024/25 for the paired static sampling. We are in correspondence with the applicant to address these information gaps specifically, and to establish whether there is a greater importance of this area for barbastelle than previously anticipated and whether that changes the impact assessment.	**Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has reflected that. With regards to barbastelle, the Applicant has reviewed the previous bat survey data and barbastelle were recorded in September 2023; albeit not in exactly the same locations as the paired static survey undertaken in 2025. The paired static data does appear to indicate a slight increase in barbastelle activity; the BTO Acoustic Pipeline identified 955 recordings containing barbastelle echolocation calls across all three locations and both the October 2024 and May 2025 deployments. Each of these has been manually checked by an experienced bat call analyst. This verification process found that 20 of these identifications were inaccurate, with the remaining 935 identifications confirmed as correct. These confirmed barbastelle recordings illustrate a consistent pattern, with barbastelle recordings identified from field-based detectors on only 9 occasions across all deployments/locations (six at Spinzel in October 2024 and three at The Roses in May 2025). All other recordings were from detectors placed along hedgerows, with the greatest number of recordings identified from the hedgerow detector at Spinzel in May 2025 (472). While this pattern is not based on a large number of repeated surveys, it is consistent across all three locations (when surveyed) and both deployment periods (undertaken at two different

			times of year). The Applicant will be undertaking statistical tests to confirm whether these variations indicate a statistically significant difference and this data will be provided as part of the development of the draft Statement of Common Ground with Natural England, either at Deadline 1 or a subsequent deadline. The HS2 Monitoring Report from 2018 notes: "*a barbastelle was recorded in and around the Bernwood forest for only the second time since surveys began in 2012*". Low numbers of barbastelles were trapped in 2018 (n=3) and 2022 (n=3, of 329 bats trapped). There *may* be (slightly) more barbastelles now than previously; this may be confirmed during the proposed 2026 trapping to be undertaken by HS2.
RR-203	Bat species assemblage – bat survey and field parcel analysis	Comment that the Applicant has used paired sampling data to indicate that hedgerow habitats are of greater value to bats than open habitats but it is not appropriate to group arable and grazed pasture together in this context and infer impact of change to all "open habitats". Request for the ES to quantify the total loss of cattle grazed land compared to the re-provided total cattle grazed land.	More analysis of the paired static report is being conducted which will be presented in a Technical Note at Deadline 1. It should be noted that the UK Habitat survey that has informed the BNG baseline. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** indicates that 44.96ha of grassland would be "lost" by the placing of Solar PV within these fields, but 93.86ha of grassland would either be retained or created as part of the Proposed Development.

			Therefore, there is not envisaged to be any net loss of grassland habitat and as outlined in the **Outline LEMP [EN010158/APP/7.6]** [APP-142] it is proposed that mitigation areas be cattle grazed to ensure no net loss of cattle grazed grassland habitat, so the importance of open foraging habitat is fully recognised.
RR-203	Bat species assemblage – impacts to bat roosts	Comment that it should be assumed that any tree with potential roost features may at some point be used as a roost, and agreement with the ES to inform any direct damage or loss through further survey and licensing.	The design of the Proposed Development has strived to minimise tree loss and it should be noted that all blocks of woodland have been retained. All individual trees within the Order Limits have already been subject to a ground-level assessment to determine their potential to be used by roosting bats. A small number of trees (up to 16) would have to be removed to accommodate the Proposed Development, the **Outline CEMP [EN010158/APP/7.2]** [APP-138] gives a commitment that all trees to be felled would be surveyed prior to removal (either a climbing survey or emergence survey) and if evidence of bats is found, then that tree would be retained whilst suitable mitigation is agreed with Natural England before being removed under licence.
RR-203	Bat species assemblage – impacts to bat roosts	Comment that avoiding disturbance effects on bat roosts during construction is required and needs further consideration, including extending the minimum 10-15m buffer zone with particular reference to solar PV piling as	Disturbance may come about through noise, light or an increase in human presence, particularly at night; these sources are often conflated. Additional sources of lighting and human presence at night can be controlled through restrictions on working

there may be disturbance or deleterious effects.

Recommendation (2): Supplement the provisions of the CEMP to include only piling for PV panel installation in one position at a time when in proximity to hedgerow trees (distance to be decided, but possibly up to 50m from any tree with bat roost potential) or provide evidence to demonstrate why the noise levels from the operations would not be disturbing.

hours. With respect to noise, until recently, most measurement of noise were undertaken to determine impacts on human receptors rather than bats. Such measurements are typically 'weighted' to reflect the relative loudness of sounds as perceived by the human ear rather than unweighted noise levels. 'A-weighted' data (represented as dBA) emphasise sounds inaudible to bats whilst under-representing those audible to bats. However, there is increasing awareness of the need to use unweighted measurements and examples of such unweighted data are now available within the Bat Mitigation Guidelines (Reason & Wray, 2025). These guidelines also provide a template for noise assessments

At Deadline 1, the Applicant will present an assessment of the risk of disturbance from construction noise generated by elements of the Proposed Development (using a template which has been accepted by Natural England in licence applications) in a Technical Note. This assessment also summarises a high-frequency unweighted noise study carried out at an operational solar farm. Neither construction nor operation are considered to represent a significant source of noise disturbance; however, some pre-construction assessments may be required depending on haul route layout and programme.

			For the most part, as disturbance is unlikely, even for the low threshold of disturbance for offences which derive from domestic legislation (see detailed noise impact assessment), the extended restrictions suggested are not based on evidence and not required. In the absence of a licence, a Precautionary Working Method Statement will be produced and secured via **Outline CEMP [EN010158/APP/7.2] [APP-138].**
RR-203	Bat species assemblage – lighting	Request for the **Outline CEMP [EN010158/APP/7/2] [APP-138]** to specify that the Passive Infrared Detectors are proposed to operate CCTV only and not to trigger lighting of the panel areas themselves. *Recommendation (7): Update LEMP and CEMP to state which best practice guidelines are referenced with regards to lighting and what measures contained in those guidelines are being referred to.*	There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments** [**EN010158/APP/5.9.2] [AS-018]** and the **Outline CEMP [EN010158/APP/7.2] [APP-138]**. The CCTV is based on infra-red and therefore Solar PV would not be continuous lit by visible lighting. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting **Outline CEMP [EN010158/APP/7.2] [APP-138]**.
RR-203	Bat species assemblage –	Request for confirmation that the width of the buffer zones along woodland edges and hedgerows would be measured from the	As submitted, the Proposed Development has undertaken the measurement of offsets from the centreline of hedgerows based on drone-generated

buffer zone measurement	edge of the feature being protected and not hedgerow centreline.	topographical data and UK Habitat data. The spatial extent of development as set out in the DCO Application has similarly been based on offsets from the centreline of the hedgerows. This is considered to be the most consistent data source available across the Site. Hedgerow size can change over time as hedgerows are trimmed and then left to grow out again; therefore, the Applicant believes that the approach of measuring the hedgerow from the centreline is the most reliable. Natural England has stated that buffers should be measured from each hedgerow's outer limits (a variable width) and, if not, that additional width should be added to each buffer. NE has (explicitly) not taken into account that there is an additional 5m from the security fence to the first set of panels; it has said that this is because the management differs, and therefore that width is not relevant. However, that depends on whether the buffer zones are to maintain connectivity or provide a foraging resource. The Applicant proposes buffer zones to maintain connectivity, and specifically to minimise the risk of displacement to commuting bats. Commuting routes are protected by wide buffers that are wider than the distance over which the echolocation calls of Bechstein's bats are likely to operate, giving some indication that these buffers should be adequate/effective. In any case, the 'additional' 5m

			strips would not be intensively managed, but sown to grassland and (where achievable) lightly grazed. Since Phase Two Consultation, the Applicant has also increased offsets to hedgerows where they are considered to be key areas for commuting and foraging bats. This includes offsets along fields linking Finemere Wood and Runts Wood, hedgerows that link Shrubs Wood, Sheephouse Wood and Decoypond Wood and also along the Claydon Brook in most fields from 10m to 20m to the fenceline, plus 5m to the fenceline. Specifically: • Fields D28 and D29 between Finemere Wood and Runts Wood have had the buffer increased to 30m. • Between Sheephouse Wood, Shrubs Wood and Decoypond Wood the buffer has increased to 15m either side of hedgerows. • Along the Claydon Brook Fields E11, E20 and E21 where practicable the buffer has increased to 20m.
RR-203	Bat species assemblage – buffer zone measurement	Comment that use of undeveloped buffer zones as mitigation to prevent impacts and allow hedgerow connections to continue to be used during and post-construction is a measure that lacks published scientific evidence of its effectiveness, however should bats avoid areas where PV panels	The **Outline LEMP [EN010158/APP/7.6] [APP-142]** outlines that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats.

		are situated or display reduced activity, it would seem that the further the panels are positioned from a feature of interest the lower the likelihood of experiencing these effects and so Natural England is supportive of this measure, provided there is appropriate future monitoring.	Further detail will be added into the **Outline LEMP [EN010158/APP/7.6] [APP-142]** at Deadline 1 of the examination to set out the methodology of the monitoring strategy. Further engagement is proposed with Natural England to discuss this in further detail. This would also confirm that the final bat monitoring within the detailed Landscape and Ecological Management Plan would be submitted to and approved in writing by the relevant local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development. The strategy will be developed in line with CIEEM's Bat Mitigation Guidelines[5] (Chapter 9) to monitor the effectiveness of the mitigation proposed in relation to bats.
RR-203	Bat species assemblage – Outline LEMP	Request for Appendix 2B of the **Outline LEMP [EN010158/APP/7.6] [APP-142]** to include numerical figures which quantify the width of indicative mitigation corridors for bats. *Recommendation (6): Provide a plan clearly showing the size of each of the buffers along hedgerows and woodland edges, confirming*	Comments related to measurement of buffers from the outer limits of a hedgerow as opposed to the centre line have been given above. The width of buffers are all set out in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** as the securing mechanism for them. The buffers specifically relating to bats are also referenced in Management Objective 12 – Create mitigation

[5] Bat Mitigation Guidelines (Reason & Wray, 2025). Available online accessed 27/01/2026. https://cieem.net/resource/uk-bat-mitigation-guidelines-2025/

		that this is from the edge of the feature and not the centreline (especially of a hedgerow)	corridors for bats of the **Outline LEMP [EN010158/APP/7.6] [APP-142].** The Green and Blue Infrastructure Parameter Plans included within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** are to scale and do show the width of all buffers. The Applicant will colour code the widths of the buffers on these plans to submit at Deadline 1.
RR-203	Bat species assemblage – monitoring	Comment welcoming further discussion on proposed monitoring strategy to agree further detail. Example given of methodology for baseline survey, as reliance on surveys are using acoustic methodology (as per those informing the application) means it will not be possible to understand the effects on the development on Bechstein's bats specifically. *Recommendation (5): Provide greater detail of what a monitoring strategy will entail, to allow for a comparison to the existing baseline as well as monitoring impacts to Bechstein's bat specifically.*	It is acknowledged that acoustic data alone would not provide information on impacts to Bechstein's bats as acoustic bat detectors do not specifically enable the differentiation of Bechstein's bats from other species of *Myotis* bats. However, it is still considered that acoustic monitoring would form part of long-term monitoring, albeit with appropriate assumptions and limitations acknowledged. However, the population here is already subject to trapping and radio-tracking that targets the same woodlands as would need to be trapped for the Proposed Development. Collaboration with HS2 will therefore be required; it will be necessary to enter into a data-sharing agreement. It would also be important to share data with HS2 (and the North Buckinghamshire Bat Group who undertake a comprehensive bat-box monitoring scheme). If negative impacts are seen, it would be important to compare results from the Proposed Development with wider monitoring to determine whether any effects are local and driven by the Proposed

Development, or part of a wider effect at a larger scale.

Further detail will be added into the **Outline LEMP [EN010158/APP/7.6]** [APP-142] at Deadline 1 of the examination to set out the methodology of the monitoring strategy. Further engagement is proposed with Natural England to discuss this in further detail. This would also confirm that the final bat monitoring measures within the detailed Landscape and Ecological Management Plan would be submitted to and approved in writing by the local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development.

The strategy will be developed in line with CIEEM's Bat Mitigation Guidelines
(Chapter 9[6]) to monitor the effectiveness of the mitigation proposed in relation to bats.

The monitoring strategy will identify:

- who is responsible for monitoring;
- how it would be funded;

[6] Bat Mitigation Guidelines (Reason & Wray, 2025). Available online accessed 27/01/2026. https://cieem.net/resource/uk-bat-mitigation-guidelines-2025/

- how the monitoring would be carried out (methods, equipment, survey effort, licensing);
- how access for monitoring would be ensured (even should assets change hands);
- how and when the results are to be reported, and to whom, and
- the party(ies) responsible for any remedial measures that are required.

The monitoring strategy will:

- define the elements that are to be monitored, and when;
- outline the monitoring methods to be used given that audio devices such as static detectors do not clearly distinguish Bechstein's bats calls from other *Myotis sp;*
- have clearly defined and ideally measurable objectives;
- include a clear definition of success for each mitigation and compensation feature;
- include proportionate and appropriate methods for data collection and analysis;
- outline triggers (thresholds) for remedial action, and what that remedial action should be, and

			• contribute to a wider understanding of the measures applied.
RR-203	Design	*Recommendation (1): on a precautionary basis, remove solar PV and infrastructure from fields B6, B7, and B8, create additional diverse grassland and scrub habitats along buffer zones, and manage these areas as cattle-grazed pasture adding to the mitigation measures onsite and providing grazed pasture in a range of location, aspects and sheltered locations.*	Firstly the **Statement of Need [EN010158/APP/5.6]** [APP-036] sets out the case for the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes. It also explains that access to the UK's electricity network is limited, and therefore that using the available and currently underutilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. In this regard, the Applicant has sought to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target. The fields cited (B6, B7, and B8) are clearly within the home ranges of Bechstein's bats, and grassland/pasture is more valuable than arable due to supporting a greater insect biomass. The extent to which the three pasture areas (Fields B6, B7 and B8) are of greater value than other pasture areas, based on the quality of the habitat as well as their location, is questionable.

B6 is smaller cattle-grazed field on the western boundary of Shrubs Wood. The western border of B7 (grassland) is adjacent to planting which links Sheephouse Wood and Decoypond Wood with the Calvert lakes to the north. To its north (broadly) is B6, both linked via offsets to Shrubs Wood. To its east are B10 (arable) and B8 (grassland).

B10 (arable) is bordered by Shrubs Wood to the north and B8 to the south; B8 also abuts Sheephouse Wood. All field boundaries are subject to a 15m offset from hedgerows and 30m offset from woodland blocks.

In response to Natural England's request to remove panels from B6, B7 and B8 on the basis that inadequate value has been ascribed to these fields, the Applicant has already adequately considered impacts on roosts, foraging and commuting routes.

Roosts in woodlands and within hedgerows are protected with buffers; these buffers have been increased in the fields of concern (hedges along fields B3/B7, B6/B7, B7/B10, B7/B8, B10/B11, B8/B9).

Natural England has stated that buffers should be measured from each hedgerow's outer limits (a variable width) and, if not, that additional width should be added to each buffer. NE has (explicitly) not taken into account that there is an additional 5m from the security fence to the first set of panels; it

has said that this is because the management differs, and therefore that width is not relevant. However, that depends on whether the buffer zones are to maintain connectivity or provide a foraging resource. The Applicant has proposed buffer zones to maintain connectivity, and specifically to minimise the risk of displacement to commuting bats. Commuting routes would be protected by wide buffers that are wider than the distance over which the echolocation calls of Bechstein's bats are likely to operate, giving some indication that these buffers should be adequate/effective. In any case, the 'additional' 5m strips would not be intensively managed, but sown to meadow and (where achievable) lightly grazed.

For most fields under current management, the invertebrate biomass would be relatively low due to standard agricultural practices, so it is unlikely that the land adjacent to most existing hedgerows offers a hugely valuable resource. In other words, their value is the hedgerow structure and connections to the wider landscape and this is being retained.

The grassland habitat which is being removed is being replaced by more than twice as much grassland, of greater value. Mitigating the loss of foraging resource is therefore not dependent on the buffer zones. Much of that mitigation is between Runts Wood and Finemere Wood, which is close to many more identified Bechstein's roosts than the

fields targeted by Natural England. Indeed, few Bechstein's roosts are known from Sheephouse, Shrubs and Runts Woods, the woodlands closest to B6, B7, B8, B10.

It is true that habitat immediately north, east and west of both Decoypond Wood and Sheephouse Wood SSSI has been identified as one of 'the most frequently used non-woodland core foraging areas'; however, this description was also given to habitat immediately north, south and west of Finemere Wood SSSI, which includes areas targeted for habitat enhancements. Mitigation is being provided at a landscape-scale within the Core Sustenance Zone of Bechstein's bat.

These fields are currently relatively species-poor and intensively grazed by a non-organic cattle herd and therefore unlikely to be of greater value than the fields that are already being allocated for cattle grazing within the landscape masterplan.

The BNG baseline in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** indicate that 44.96ha of grassland would be "lost" by the placing of Solar PV within these fields, but 93.86ha of grassland would either be retained or created as part of the Proposed Development. Therefore, there is not envisaged to be any net loss of grassland habitat and as outlined in the **Outline LEMP**

[EN010158/APP/7.6] [APP-142] it is proposed that these mitigation areas be cattle grazed to ensure no net loss of cattle grazed grassland habitat. The overall Solar PV area has been reduced significantly throughout the consultation process as a result of discussions held with stakeholders, from 449ha at the Phase One Consultation stage to 279ha at the Phase Two Consultation stage, equating to an area reduction of 37.7% across the whole Site.

Setbacks from hedgerows specifically within Fields B6, B7, B8 and B10 that link Shrubs Wood, Sheephouse Wood and Decoypond Wood have been increased to 15m following consultation with Natural England and recognising that these hedgerows provide key routes for commuting and foraging bats. Within these buffers, a mosaic of grassland and scrub is proposed, along with strengthening the existing hedgerows to provide a wide corridor link between these woodlands, helping to reduce potential displacement effects from Solar PV to foraging and commuting bats and ensure the connectivity between these woodlands is maintained.

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 to create a coherent ecological network that would link the Site to the wider

			landscape across the Core Sustenance Zone for Bechstein's bat, reducing fragmentation across the wider landscape. It is considered that the current approach to the design and mitigation is sufficient to remove potential likely significant effects as far as practicable.
RR-203	LEMP	*Recommendation (3): Update the LEMP to ensure that hedgerow buffer zones are managed with whole insect lifecycles in mind. Avoid promoting floristic diversity over the development of tussocky grassland that is left uncut for multiple years avoiding annual disruption of lifecycles.*	The **Outline LEMP [EN010158/APP/7.6] [APP-142]** already provides an outline for the management of buffer zones promoting the development of a mosaic of rough tussock grassland and scrub promoting the creation of optimal bat foraging habitat over floristic diversity. The development of the habitat management objectives in the detailed Landscape and Ecological Management Plan would be developed in consultation with Natural England and other stakeholders.
RR-203	Great Crested Newt	Comment that Natural England's Wildlife Licensing team have engaged with the Applicant to discuss potential impacts to Great Crested Newts and agreed the survey approach, the mitigation approach and the compensation approaches in principle.	The Applicant notes this comment and will continue to work with Natural England to refine the mitigation approach that would be taken.
RR-203	Biodiversity Net Gain	Support for the proposed Biodiversity Net Gain which would be achieved as part of the Proposed Development.	The Applicant notes this comment and thanks Natural England for its engagement on the Proposed Development to date.

RR-203	Nationally Designated Landscapes	Confirmation that the Proposed Development is not located within, or within the setting of, any nationally designated landscapes.	The Applicant notes this comment and thanks Natural England for its engagement on the Proposed Development to date.
RR-203	Soils and BMV	Agreement with the conclusions of **ES Volume 2 Chapter 12: Soil [EN010158/APP/6.2]** [APP-055] and confirmation Natural England has provided detailed comments on the **Outline Soil Management Plan** [APP-143] with no further comments to make.	The Applicant notes this comment and thanks Natural England for its engagement on the Proposed Development to date.
RR-203	Ancient woodland and ancient/veteran trees	Comment that impacts on ancient woodland and ancient and veteran trees should be considered in line with paragraph 193c of the NPPF, along with Natural England and Forestry Commission standing advice.	The Applicant recognises that, in line with paragraph 193(c) of the NPPF and Natural England/Forestry Commission standing advice, ancient woodland and ancient/veteran trees are irreplaceable resources that should be afforded the highest level of protection. Accordingly, the **Arboricultural Impact Assessment (ES Volume 4, Appendix 7.13 [EN010158/APP/6.4]** [APP-099]) has treated these features as primary constraints, seeking to avoid impacts wherever practicable. There are no impacts on any ancient trees or ancient woodland, and the Proposed Development layout has been iteratively refined to minimise effects on veteran trees. Resulting in only two minor encroachments into veteran tree RPAs, which would be managed through precautionary

			construction methods or avoidance at detailed design.
RR-203	Rights of Way, Access Land, National Trails	Confirmation that Natural England has no further comments to make on impacts on rights of way network, noting the number of permanent changes alongside the proposed enhancements for the national trail which includes hedgerow screening, a 30m wide corridor and habitat enhancements.	These comments are noted. The Applicant thanks Natural England for its ongoing engagement throughout the pre-examination period and looks forward to continuing to work with Natural England and other stakeholders as the Proposed Development progresses.

Table 2-11: Thames Water Utilities Limited

Reference number	Theme	Matter raised	Response
AS-032	Existing utilities	Request for further engagement to confirm protection of TWUL's assets where clashes between proposed road widening and road surface replacement works at Claydon Road and Snake Lane/Fidlers Field currently exist.	The Applicant has engaged with Thames Water Utilities Limited (TWUL) to seek to agree protective provisions which would be included in the DCO. Engagement with TWUL would be undertaken prior to commencement of construction activities to identify utilities and agree safe methods of working around existing utilities. The Applicant has provided TWUL with a copy of standard protective provisions for Electricity, Gas, Water and Sewerage undertakers to aid these discussions and has also received a copy of TWUL's standard form PPs which it is currently reviewing with a view to refining and resolving any issues.

Table 2-12: UK Health Security Agency and Office for Health Improvement and Disparities

Reference number	Theme	Matter raised	Response
RR-276	BESS Plume Assessment Summary	Comments on the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**, including: • That the Applicant has consulted UKHSA on a draft of the Report and that it has confirmed that a detailed plume assessment report addressing UKHSA comments will be provided at Deadline 1. • That a preliminary detailed dispersion modelling assessment should be undertaken based on current assumptions. • That the criteria used for assessment relate to mortality and do not consider more minor health impacts caused by exposure to BESS plume. • That UK Air Quality Guidelines and US EPA Acute Exposure Guideline Levels should be used for future detailed dispersion modelling to assess potential health impacts. • That the selection of meteorology data from High Wycombe Hqair should be justified and the data range provided in the next iteration of the report.	The Applicant can confirm that a Plume Assessment Addendum: Air Quality Assessment has been undertaken, and the results have been shared with the UKHSA through further engagement and this report will be submitted at Deadline 1. This report addresses the comments provided by UKHSA against the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. A letter to the Applicant from UKHSA which confirms this will also be submitted at Deadline 1. As a result of this ongoing engagement the Applicant believes that all of the matters raised in the UKHSA's Relevant Representation have been addressed. The impacts have been assessed against commonly applied Air Quality Standards, including US EPA Acute Exposure Guidelines Level (AEGL) and UK Air Quality Standards. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the

- That a tables and map showing sensitive receptor locations and their distance from the proposed BESS be included in the next iteration of the report.
- That at detailed dispersion modelling stage a sensitivity analysis should be included to evaluate potential health impacts on sensitive receptors not in the prevailing wind direction.
- That clarification of the term 'harmfully impacted' at Point 4.8.6 of the Report is needed.
- That details of the model used to inform the plume assessment and software should be included in the next iteration of the report.

risk of significant health effects to the surrounding land uses is judged to be very low.

The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** provides a detailed dispersion modelling to evaluate health impacts on sensitive receptors, and the updated Plume Study would take the same methodology i.e. model all sensitive receptors within 1km and assume the prevailing wind is to each receptor location.

The criteria in the SLOT and SLOD analysis within the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** relate to localised BESS site safety for the first responders and the site operatives. This is a key aspect of the risk assessment and consequence modelling and is supplemented by the Preliminary Air Quality Assessment that has been subsequently carried out and will be submitted at Deadline 1.

The clarification of the term 'harmfully impacted' relates to the Specific Level of Toxicity (SLOT) extent for Carbon Monoxide at 67m. This relates to exposure conditions just on the verge of causing a low % (1% mortality) of deaths in the exposed population.

Updated Meteorological data is set out and justified, sensitive receptor locations are provided and shown in tables and mapped. Hourly sequential

meteorological data from the Benson meteorological station from between 2020 and 2024 (5 years of data) have been used within the model.

An ALOHA software model has been utilised for the BESS area life safety and Atmospheric Dispersion Modelling Software has been utilised for sensitive receptor air quality.

An illustrative BESS design has been selected. The BESS enclosure design impacts emission release in addition to the basic battery cell + module material basic gas emissions. An updated detailed plume assessment would be carried out once the battery system has been finalised to update the existing plume studies.

2.3. Parish councils

2.3.1. The table below set out the responses to the Relevant Representations from parish councils and the response from the Applicant.

Table 2-13 Calvert Green Parish Council

Reference number	Theme	Matter raised	Response
RR-028	Landscape and visual	Comment that the Order Limits lies within an area of significant natural beauty and its rural character would be altered and industrialised by the Proposed Development.	The Proposed Development lies partially within the locally designated Quainton-Wing Hills Area of Attractive Landscape (AAL). As described in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** significant effects

on landscape character would be limited to Fields D28 and D29 within the AAL at Year 1 and would remain for the duration of operation over a localised extent. As further described in Chapter 10 of the ES, these local effects would not result in significant effects on the wider Quainton-Wing Hills AAL.

The effect on landscape character within the AAL would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules. It is acknowledged that the character and appearance of the landscape would change from arable farmland to a utility-scale solar PV development. However, the Applicant does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as overhead powerlines and occasional utilitarian agricultural buildings.

The assessment includes evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors, through new hedgerow and tree planting and the sowing of wildflower rich grassland maintaining a vegetative ground cover throughout

			the majority of the Site as secured in the **Outline LEMP [EN010158/APP/7.6]** [APP-142].
RR-028	Agricultural land	Comment that the Order Limits lies within an area of significant agricultural value.	**ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4]** [APP-126] concludes that only 1.51% of the land is classified as BMV. The area of BMV land would not be used for any permanent green, blue or hard infrastructure. A total of 7.19ha (1.07%) was graded as Grade 3a and 3.01ha (0.44%) as Grade 2. There is no Grade 1 land within the Order Limits and areas of Grades 2 and 3a have been minimised wherever possible. The area of BMV land would only be used for Solar PV and would be managed to prevent any long-term soil degradation. The Applicant has committed to returning the soil back to its pre-construction quality.
RR-028	Biodiversity	Comment that the Proposed Development would affect biodiversity due to habitat loss. Reference made to cumulative effect in combination with HS2.	The Applicant has strived to keep habitat loss to a minimum. The habitats to be lost are arable land, modified grassland and some hedgerow sections (the majority of which would be reinstated) and 16 individual trees. Significant planting gains are proposed, including approx. 8.78ha of structural tree planting and 4,336 linear metres of structural hedgerow planting and over 400 new trees. A total of 88.8ha of whole fields have been set aside as proposed areas for mitigation and/or enhancement. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4]** [APP-103]

			demonstrates that the Proposed Development would have a significant positive net gain for biodiversity. Potential cumulative effects (including with respect to HS2) are assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.
RR-028	Use of agricultural land	Comment that the Proposed Development would affect local food security.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the site is considered to be BMV land. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline Soil Management Plan [EN010158/APP/7.7] [APP-143]** meaning it would be capable of agricultural production.

			Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production would not be significant.
RR-028	Use of agricultural land	Comment that the Proposed Development would cause long-term soil degradation.	Soil mitigation measures are outlined within the **Outline SMP [EN010158/APP/7.3] [APP-143].** Industry standard guidance has been followed to ensure the soils are being protected and managed correctly. Any potential damage to the soil would be reversible and temporary.
RR-028	Impact on local residents	Comment that the Proposed Development would affect the amenity of local residents, with reference to glare, construction noise and access to countryside.	The potential for glint and glare effects on local residents have been addressed with regards to PRoWs and dwellings in Sections 8.2 and 9.4 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082].** No significant residual effects are identified.

Noise effects during construction have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** [APP-056]. No noise effects are identified as being significant following the adoption of appropriate mitigation measures.

As set out in the **Outline RoWAS [EN010158/APP/7.8]** [APP-144], there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development.

The Proposed Development would increase access within the Order Limits and enhance connectivity in the local area through the inclusion of three new permissive footpaths within the Order Limits. The new permissive footpaths would be as follows:

- A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane;
- A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and
- A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way.

The proposed permissive footpaths would be implemented during the construction phase, remain

			open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning. During the 30-month construction phase, existing PRoWs and permissive routes that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**.
RR-028	Alternatives	Comment that alternative brownfield sites and scales of solar would be more appropriate.	Paragraph 3.1.1 of NPS EN-1 (2024) explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives. Further, while smaller schemes can make a valuable contribution to decarbonisation, Paragraph 3.3.12 of NPS EN-1 (2024) demonstrates government's view that such schemes are needed alongside, but not instead of, large-scale ground mount solar schemes. This is because the bulk generation potential of large-scale schemes and their connection to the National

Electricity Transmission System enables their benefits to be felt more widely. Section 7.2 and 7.3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** provides further support to the need for large scale schemes as opposed to relying only on small-scale schemes (including brownfield sites) to meet the government's aims.

The scale of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity, in line with government policy, whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** sets out the justification for the Proposed Development, including its scale and why large scale projects like the Proposed Development are needed alongside smaller scale (roof top) solar.

The Applicant has set out its consideration of brownfield sites within **Appendix 1 – Site Selection Report** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**. This concludes that none of the available brownfield sites within the search area (being a 10km radius from the National Grid East Claydon Substation) would meet the project objectives, largely due to their insufficient size.

Table 2-14: East Claydon Parish Council

Reference number	Theme	Matter raised	Response
RR-070	Consultation process	Comment that there is a lack of understanding about the local community.	The Applicant respectfully disagrees with this statement. The Applicant approached pre-application consultation with a commitment to understanding the views of the local community in order to help shape plans for the Proposed Development. This included two phases of formal consultation and a targeted consultation, alongside a programme of continuous stakeholder engagement. For more information about how the Applicant approached pre-application consultation and engagement and had regard to the feedback received, see the **Consultation Report [EN010158/APP/5.1] [APP-020]**. Further, the Environmental Statement includes **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** which provides an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. The assessment has been informed by a robust environmental baseline, developed using 2021 Census data, alongside other relevant data sources including the ONS Annual Population Survey

			(2024), UK Business Counts (2023), English Indices of Multiple Deprivation (2019), ONS Estimates for Regional Gross Value Added (GVA) (2022), DFE Apprenticeships and Traineeships Data (2025), DEFRA data on the structure of the Agricultural Industry in England (2025) and Buckinghamshire Council Public Rights of Way data.
RR-070	Principle of development	Comment that the principle of renewable energy is supported but not at the expense of negative impacts on agricultural land and rural communities.	As set out in the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**, Paragraph 3.1.1 of the NPS EN-1 (2024) explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. The NPS EN-1 (2024) establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes Solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 (2024) explains that the UK Government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, *"will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible."*

	The **Statement of Need [EN010158/APP/5.6] [APP-036]** demonstrates how the urgent need for an unprecedented capacity of new solar generation outweighs any potential significant adverse impacts of the Proposed Development which, as the Environmental Statement sets out, are limited. The substantial benefits and need for the Proposed Development as set out in Section 3 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**, including the delivery of CNP infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development. There is no requirement to demonstrate exceptional circumstances given that there is an established presumption in favour of the granting consent for CNP infrastructure like the Proposed Development. Further, the Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the Order Limits. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low.

RR-070	Alternatives	Comment that the Proposed Development is in the wrong location.	The **Site Selection Report** at **Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. This sets out that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints. Chapter 8 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** provides evidence on the suitability of the proposed location for large-scale solar.
RR-070	Alternatives	Comment that alternative methods of power generation should be explored by the Applicant as opposed to the Proposed Development.	The consideration of alternative renewable technologies is set out within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**. This concludes that solar technology was the most suitable renewable energy generating solution for the Site. The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector". Section 7.7 of the Statement

			of Need illustrates that large-scale solar is likely to produce a greater amount of energy per acre of land than e.g. crops-to-biogas, and a comparable amount of energy as onshore wind. Chapter 8 of the Statement of Need also provides evidence on the suitability of the proposed location from a solar irradiance, grid operability and connection availability perspective and this Chapter should be read together with **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.

Table 2-15: Edgcott Parish Council

Reference number	Theme	Matter raised	Response
RR-072	General comment	Comment that the scale of the Proposed Development would have an impact on the local environment.	Large scale solar development is needed to help meet the urgent need for homegrown, secure, renewable energy that is required by Government policy to address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of schemes improves their economic efficiency, bringing power to market at the lowest cost possible. It is shown that larger schemes deliver energy more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity.

			The **Statement of Need [EN010158/APP/5.6] [APP-036]** provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** sets out the reasoning for the Proposed Development, including its size and location. An Environmental Impact Assessment (EIA) has been undertaken to assess the environmental impacts of the Proposed Development and this concluded that there are likely significant effects on Landscape and Visual, Cultural Heritage and a potentially significant effect on Biodiversity, specifically Bechstein's bats. The Applicant has sought to avoid and reduce likely and potential significant effects through the design of the Proposed Development and through the implementation of mitigation measures which are set out and secured in several outline management plans such as the **Outline CEMP [EN010158/APP/7.2] [APP-138]**.
RR-072	Biodiversity	Comment that the Proposed Development would have an impact on biodiversity.	The full detailed assessment of the potential impacts on biodiversity is presented in **ES Volume**

			2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity.
RR-072	Socioeconomic impacts	Comment that the Proposed Development would have an impact on the farming community.	Effects on the wider agricultural economy, and on the economic operation of specific businesses, landholdings and tenant farms and their operations have been assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. For some operations, there would be a long-term temporary or permanent residual effect extending from construction, through the operation (including maintenance) phase where land is changed from agricultural use to support the Proposed Development, until it is reinstated following decommissioning (at which point the landowner

may seek agricultural tenants on the re-instated land).

It is noted that commercial arrangements (including land swaps and financial compensation) have been agreed in principle with the majority of affected agricultural landowners and tenants, as detailed at paragraphs 14.8.24-14.8.27 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. In all cases heads of terms have been agreed, and in some cases the relevant agreements have been finalised. Where final agreement has not yet been reached, the Applicant is committed to ongoing engagement with affected parties to seek to reach agreement at the earliest opportunity.

This addresses the potential for impacts on the relevant landholdings in terms of the amount and quality of land (through replacement of at least the same level of provision), and in terms of severance of wider landholdings (where all replacement land is equally accessible from remaining landholdings and agricultural facilities; and for example, through the commitment to allowing for a grazing animal corridor through Field E23 to prevent severance).

Other (agricultural or related) business may experience change to their operating environment (including through changes in access to land currently used within the Order Limits, environmental change and changes to access).

			These effects have been considered across the ES, and do not constitute a significant effect in terms of the viability for operation of businesses. During construction, there are several measures within the **Outline CTMP [EN010158/APP/7.5] [APP-141]** to mitigate potential effects, including that the Applicant would create a protocol for working with local businesses to ensure the construction traffic does not interfere with deliveries or normal business traffic wherever possible. Effects relating to health and wellbeing as a result of changing socio-economic activity have been considered (drawing on the above) within Section 3.7 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**. That assessment recognises the prevailing pressures within farming and agricultural work which may make members of that community more sensitive to change. It draws on compensation agreements and mitigation referred to above (within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**) to conclude a non-significant effect in terms of population-scale health.
RR-072	Socio-economic impacts	Comment that the Proposed Development would have an impact on local businesses.	Effects on the operation of local businesses, including landholdings and tenant farms and their operations have been assessed within **ES Volume**

			2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]. Effects relating to agricultural landowners and tenants have been considered above. Non-agricultural business and development land may experience change to their operating environment (including through changes in access to land currently used within the Order Limits, environmental change and changes to access). These effects have been considered across the ES, and do not constitute a significant effect in terms of the viability for operation of businesses. During construction, there are several measures within the **Outline CTMP [EN010158/APP/7.5] [APP-141]** to mitigate potential effects, including that the Applicant would create a protocol for working with local businesses to ensure the construction traffic does not interfere with deliveries or normal business traffic wherever possible.
RR-072	Socioeconomic impacts	Comment that the Proposed Development would have an impact on the wellbeing of neighbouring communities.	Effects relating to health and wellbeing have been summarised within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**. It is acknowledged that there would be changes to the environment and to other determinants of pathways for physical and mental health that would be experienced by neighbouring communities, particularly by sensitive sub-populations.

			ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083] sets out how effects have been considered in this regard, and highlights how mitigation, monitoring and community engagement have been undertaken and would be secured to minimise the potential for adverse health and wellbeing effects as far as reasonably practicable.
RR-072	Approach to EIA	Comment that the Scoping Report does not address many of the key issues of the Proposed Development.	The EIA has been undertaken in line with the EIA Scoping Opinion (**ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]**) and includes an assessment for all environmental factors that were requested to be scoped into the EIA. A detailed breakdown of the Scoping Opinion and the Applicant's response is set out in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4] [APP-081].**

Table 2-16: Granborough Parish Council

Reference number	Theme	Matter raised	Response
RR-099	Cumulative effects	Comment that there could be a negative cumulative effect of the Proposed Development in combination with other energy projects in the local area. Specific reference made to landscape and visual	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is

		amenity, environmental effects and loss of agricultural land.	detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060]. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list. The assessment presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060] concludes that there are a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity. There are no likely significant inter-project residual cumulative effects on the loss of agricultural land.
RR-099	Benefits	Comment that information about the benefits of the Proposed Development should be provided.	The benefits of the Proposed Development are set out in Section 3 of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027]. Further information on the benefits of the Proposed Development towards the Government's aim to deliver a low-carbon, secure and affordable energy system, is provided in the **Statement of Need [EN010158/APP/5.6]** [APP-036]. TAdditionally, the Proposed Development provides the following other benefits: • Proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of PRoWs, as summarised below:

  - A diversion to the existing PRoW Footpath (reference 'ECL/4/2') (463m to be-stopped up) to the north of Parcel 3 to align the PRoW Footpath with the field boundaries of Fields E10 and E11, rather than crossing Field E11 (new length 559m).
  - A diversion to the existing PRoW Footpath (reference 'ECL/7/2') (243m to be-stopped up) to the east of Parcel 2 to align the PRoW Footpath with the field boundary of Field D19 (new length 274m).
  - A diversion to the existing PRoW Footpath (reference 'SCL/13/2') (323m to-be-stopped up) to the south of Parcel 1 (between Shrubs Wood and Decoypond Wood) to align the PRoW Footpath with the field boundary of Field B7 (new length 410m).
  - Diversions to three existing PRoW Footpaths (references 'SCL/13/1', 'SCL/12/2' and a further diversion to 'SCL/13/2') (1,285m to-be-stopped up) to rationalise them into a single PRoW Footpath providing access between Pond Farm and Calvert Road (new length 1,027m).
- The creation of three permissive paths:
  - A new permissive path connecting a rationalised PRoW before tracking east to the

south of Shrubs Wood, east across Knowl Hill and then tracking north towards Three Points Lane (approximate length 1.9km).

  - A new permissive path connecting the above permissive path to Calvert Road, providing wider connectivity with the local network of PRoWs (approximate length 0.7km).
  - A new permissive path to the south of Botolph Claydon connecting the Bernwood Jubilee Way to an existing PRoW (approximate length 0.5km).

- Significant planting gains of approximately 8.78ha of structural tree planting and approximately 4,336 linear meters of structural hedgerow planting.
- A total of 88.8ha of whole fields have been set aside as proposed areas for mitigation and/or enhancement.
- A variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland open fields; scrub and margins with wildflower; the establishment of ecological ponds (either former ponds or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal to maintain bat flight

lines across the landscape and provide a winter seed source for birds.

- A BNG that is significantly in excess of 10% and equates to a secured net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units.
- An estimated net addition of 420 to 470 full time equivalent construction jobs within the CLMA per year of the Proposed Development's construction.
- An estimated net addition of 18 full time equivalent operational jobs supported by the Proposed Development's operational (including maintenance) phase.
- The provision of an **Outline ESSCP [EN010158/APP/7.14] [APP-150]** which, among other things:
  - Outlines the key elements of the socio-economic baseline analysis that have informed the outline plan and would guide the scale and balance of actions required to generate economic benefits;
  - Underpins the conditions required to successfully promote economic benefits;

  - Establishes a set of core objectives to promote access to employment, workforce development and business prosperity; and
  - Includes the Applicant's commitment to an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector. It is envisaged that the Education and Skills Fund would support the priorities set out in the detailed ESSCP. The sum of £50,000 would be allocated annually, from the Date of Commencement until the Date of Decommissioning of the Proposed Development. Arrangements for allocating the Fund would be agreed by the Applicant and Buckinghamshire Council.

- Interpretation boards for Claydon House and Claydon Registered Park and Garden on the proposed permissive path to Knowl Hill to better reveal the significance of the assets and improve appreciation and understanding of it as secured by the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.2] [AS-007]** and the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**.

The Applicant is also proposing a Community Benefit Fund reflecting £400 per MW of installed capacity per year from the start of operation and lasting throughout the operational lifetime of the

			Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area.

Table 2-17: Grendon Underwood Parish Council

Reference number	Theme	Matter raised	Response
RR-101	Alternatives	Comments opposing use of agricultural land for solar, with preference for brownfield sites.	The Applicant has set out its consideration of brownfields sites within **Appendix 1 – Site Selection Report** to the **Planning Statement [EN010158/APP/5.7.2]** [**AS-027**]. This concludes that none of the available brownfield sites within the search area (being a 10km radius from the National Grid East Claydon Substation) would meet the project objectives, largely due to their size. Paragraph 3.1.1 of NPS EN-1 (2024) sets out that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. Further, the Applicant has continually sought to minimise the use of BMV agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra

			and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Order Limits are concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low.
RR-101	Principle of development	Comment that there is a surplus of solar energy proposed to be built above the needs of the UK.	The Government's Clean Power 2030 Action Plan (CP2030) establishes challenging capacity ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The Government's capacity ranges for large-scale solar schemes, are currently 45-47GW by 2030 and 45-69GW by 2035. However, the need for new schemes will continue beyond 2035 not only to ensure that electricity demand is met from low carbon supplies, but also so that sufficient electricity is produced in Great Britain to power a growing number of electric vehicles to enable petrol cars to be taken off our roads, to power homes so gas boilers and cookers can be removed, and also so that other fossil fuels can be removed as an energy source for industrial and commercial processes. To mitigate against any risks which may materialise in the development of projects of all technologies needed to achieve the aims of the Clean Power 2030 Action Plan, the Government has retained a degree of optionality in its approach to prioritising the delivery of new schemes over the

	next ten years (CP2030, p31). The capacity ranges are therefore not fixed and there is a need for schemes to continue to come forward. In December 2025, NESO published the high-level results of its connection queue re-prioritisation process[7]. This has sought to prioritise projects for delivery to achieve the Government's current capacity ranges. The Applicant has received confirmation that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive). The Applicant has also received confirmation that the BESS element of the Proposed Development will receive an updated Gate 1 connection offer, the indicative dates of the connection window for the BESS have not yet been confirmed. The Proposed Development is needed to contribute to meeting the current capacity ranges. It is not the Government's intention that project approvals should be limited by the capacity ranges or NESO's prioritisation. Indeed, the Government is "*expecting an increase in planning applications with the Clean Power 2030 target*" (CP2030, p55)

[7] Connections Reform Results | National Energy System Operator

			and the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure[8], that: "*Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals*".
RR-101	Decommissioning	Comment that the land within the Order Limits would not be able to be restored to agricultural production.	The Applicant has committed to reinstating the soil back to its pre-development quality at decommissioning as set out and secured in the **Outline SMP [EN010158/APP/7.7] [APP-143]**. This plan provides detail on the area of BMV land within the Order Limits, sensitivity of soil resources and measures to mitigate damage, reference to DEFRA Construction Code, information on methods to restore affected areas, soil aftercare and information on the restoration of topsoil during construction and decommissioning.
RR-101	Procurement	Comment that solar panels are manufactured in China which cannot be relied upon over the lifetime of the Proposed Development.	While the procurement process for the Proposed Development has not yet begun, the Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used for the Proposed Development. The service life of the panels is 40 years which is the operational life for the Proposed Development.

[8] 2025 revisions to National Policy Statements for energy infrastructure: government response

			Assets with a service life of 40 years would not require any replacement unless damaged or faulty. For the purposes of the assessment, it has been assumed that 0.5% of panels would need to be replaced throughout their lifetime. Any damaged panels would be removed and replaced and this has been detailed and secured in the **Outline OEMP [EN010158/APP/7.3] [APP-139].**
RR-101	Alternatives	Comments that alternative forms of energy generation should be considered including wind, tidal, nuclear.	The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector." The Statement of Need explains that there is an urgent need for an unprecedented capacity of new solar schemes to come forward to meet the government's energy policy aims, and at Section 3.9 provides information on the capacity ranges established by the government to meet those aims. The consideration of alternative renewable technologies is set out within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**. This concludes that solar technology was the most appropriate renewable energy generating solution for the Site. Chapter 8 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** also provides evidence on the suitability of the proposed location

			from a grid operability and connection availability perspective and this Chapter should be read together with **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**. Section 7.7 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** also provides evidence on the suitability of solar for onshore generation in relation to the annual energy generation per unit of area of land, in comparison to other forms of electricity generation.
RR-101	Cumulative effects	Comment that there are a number of proposed or projects being constructed in the local area and the industrialisation of the local area would be exacerbated by the Proposed Development.	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design of the Proposed Development. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060].** This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list. The Applicant recognises the concerns regarding landscape change but does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development. An assessment to determine the likely significant effects on landscape and visual amenity is presented in **ES Volume 2, Chapter 10: Landscape and Visual**

	[EN010158/APP/6.2] [APP-053] and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. It is acknowledged that the character and appearance of the landscape within the Order Limits would therefore change from arable farmland to a utility-scale Solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules, Satellite and Main Collector Compounds, BESS, Rosefield Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings.

			The assessment presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** concludes that there are a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity. There are no likely significant inter-project residual cumulative effects on the loss of agricultural land.
RR-101	Local road network	Comment that the local road network is not suitable for construction vehicles, which is exacerbated by the construction phase overlap of other projects in the local area.	The use of the local road network has been carefully considered. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** provides a range of measures to reduce the impact of construction traffic, including, but not restricted to, routing restrictions, signage, a complaint system and speed limit requirements. The local road network is suitable and no posted weight or other restrictions on its use exist. It is also worth noting that the local road network is not being used by any other cumulative developments.
RR-101	BESS	Comment that due to safety risks the siting of the proposed BESS would need careful monitoring, standby of specialised firefighting equipment with, as well as evacuation routes.	The Applicant has designed the BESS in line with industry best practice, applicable guidance and ongoing dialogue with stakeholders such as the UKHSA and Buckinghamshire and Milton Keynes Fire Authority. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to

			any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6]** [**AS-009**]) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9]** [**APP-145**] and B**ESS Plume Assessment Summary [EN010158/APP/7.13]** [**APP-149**]. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to nearby human health receptors. The indicative design to supply the fire water to inform the Environmental Statement includes several large water tanks, which provide sufficient water storage over and above the 4 hour minimum amount that is currently required by the National Fire Chief Council Guidance (NFCC guidance).
RR-101	Impact on footpaths	Comment that the Proposed Development would lead to the loss of footpaths impacting amenity of people who enjoy walking and contacting nature.	As set out in the **Outline RoWAS [EN010158/APP/7.8]** [**APP-144**], there would be no permanent loss of PRoW as a result of the Proposed Development.

The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new permissive footpaths within the Site. The new permissive footpaths would be as follows:

- A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane;
- A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and
- A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way.

The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning.

During the 30-month construction phase, existing PRoWs and Permissive Paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around

works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months.

During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**.

Table 2-18: Little Horwood Parish Council

Reference number	Theme	Matter raised	Response
RR-165	Traffic	Request for information on the traffic plan during construction and in particular its impact on neighbouring villages.	The Applicant has sought to limit effects on communities from traffic wherever possible. This has involved designing a construction traffic route which avoids local villages. **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** provides details of projected traffic generation and trip distribution, while the **Outline CTMP [EN010158/APP/7.5] [APP-141]** provides details of how movement would be manged, and would be secured via the DCO. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** includes measures such as the formation of a Traffic Management Group, use of GPS trackers for regular HGV traffic, and the use of a visible vehicle identification system. Failure to follow the proposed

			measures would be a non-compliance matter and breach of the DCO requirements and could result in contractors being subject to penalties and individual sanctions. The contract with the Principal Contractor would include a requirement for the detailed Construction Traffic Management Plan to be included as a deliverable measure within the contract and to remain within the restrictions required under the DCO. A CTMP coordinator would be appointed on Site during the construction phase.
RR-165	Biodiversity	Request for information on the impact on the biodiversity in the local area.	The full detailed assessment of the potential impacts on biodiversity is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity.

RR-165	BNG	Query whether there would be a biodiversity net gain and whether there would be provision for neighbouring villages to improve their biodiversity to offset any negative impacts.	The Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. This could include measures to improve local biodiversity or promote habitat conservation. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity. The habitat creation and enhancement proposals and long term management are outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]**.

Table 2-19: Marsh Gibbon Parish Council

Reference number	Theme	Matter raised	Response
RR-175	General comment	Comment that the scale of the Proposed Development would have an impact on the local environment.	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of schemes

improves their economic efficiency, bringing power to market at the lowest cost possible. It is shown that larger schemes deliver energy more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity. The **Statement of Need [EN010158/APP/5.6] [APP-036]** provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** sets out the reasoning for the Proposed Development, including its size and location.

An Environmental Impact Assessment has been undertaken to assess the environmental impacts of the Proposed Development and this concluded that there would be likely significant effects on Landscape and Visual, Cultural Heritage and a potentially significant effect on Biodiversity, specifically Bechstein's bats.

The Applicant has sought to avoid and reduce impacts through the design, and in the implementation of mitigation measures which are set out and secured in several Outline Management Plans such as the **Outline CEMP [EN010158/APP/7.2] [APP-138]**.

RR-175	Biodiversity	Comment that the Proposed Development would have an impact on biodiversity.	An assessment of the impact of the Proposed Development on Biodiversity is included in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity.
RR-175	Socioeconomic impacts	Comment that the Proposed Development would have an impact on the farming community.	Effects on the wider agricultural economy, and on the economic operation of specific businesses, landholdings and tenant farms and their operations have been assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. For some operations, there would be a long-term temporary or permanent residual effect extending from construction, through the operation (including maintenance) phase where land is changed from agricultural use to support the Proposed Development, until it is reinstated following decommissioning (at which point the landowner may seek agricultural tenants on the re-instated land). It is noted that commercial arrangements (including land swaps and financial compensation) have been agreed in principle with the majority of affected agricultural landowners and tenants, as detailed at paragraphs 14.8.24-14.8.27 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**

[APP-057]. In all cases heads of terms have been agreed, and in some cases the relevant agreements have been finalised. Where final agreement has not yet been reached, the Applicant is committed to ongoing engagement with affected parties to seek to reach agreement at the earliest opportunity.

This addresses the potential for impacts on the relevant landholdings in terms of the amount and quality of land (through replacement of at least the same level of provision), and in terms of severance of wider landholdings (where all replacement land is equally accessible from remaining landholdings and agricultural facilities; and for example, through the commitment to allowing for a grazing animal corridor through Field E23 to prevent severance).

Other (agricultural or related) business may experience change to their operating environment (including through changes in access to land currently used within the Order Limits, environmental change and changes to access).

These effects have been considered across the ES, and do not constitute a significant effect in terms of the viability for operation of businesses.

During construction, there are several proposed measures within the **Outline CTMP [EN010158/APP/7.5]** [APP-141] to mitigate potential effects, including that the Applicant would create a protocol for working with local businesses to ensure the construction traffic does not interfere

			with deliveries or normal business traffic wherever possible. Effects relating to health and wellbeing as a result of changing socio-economic activity have been considered (drawing on the above) within Section 3.7 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**. That assessment recognises the prevailing pressures within farming and agricultural work which may make members of that community more sensitive to change. It draws on compensation agreements and mitigation referred to above (within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**) to conclude a non-significant effect in terms of population-scale health.
RR-175	Socioeconomic impacts	Comment that the Proposed Development would have an impact on local businesses.	Effects on the economic operation of local businesses, including landholdings and tenant farms and their operations have been assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. Effects relating to agricultural landowners and tenants have been considered above. Non-agricultural business and development land may experience change to their operating environment (including through changes in access

			to land currently used within the Order Limits, environmental change and changes to access). These effects have been considered across the ES, and do not constitute a significant effect in terms of the viability for operation of businesses. During construction, there are several proposed measures within the **Outline CTMP [EN010158/APP/7.5] [APP-141]** to mitigate potential effects, including that the Applicant would create a protocol for working with local businesses to ensure the construction traffic does not interfere with deliveries or normal business traffic wherever possible.
RR-175	Socioeconomic impacts	Comment that the Proposed Development would have an impact on the wellbeing of neighbouring communities.	Effects relating to health and wellbeing have been summarised within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**. It is acknowledged that there would be changes to the environment and to other determinants of pathways for physical and mental health that would be experienced by neighbouring communities, particularly by sensitive sub-populations. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** sets out how effects have been considered in this regard, and highlights how mitigation, monitoring and community engagement have been undertaken and

			would be secured to minimise the potential for adverse health and wellbeing effects as far as reasonably practicable. In response to concern on the level of assessment undertaken in relation to health, the Applicant will provide a separate report which will draw together the health information already submitted within the DCO Application and clearly articulate the approach taken to derive the significance of health effects. This will draw on standard guidance produced by Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP)) as is referred to in the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083].** This report will be submitted into examination at Deadline 1.
RR-175	Approach to EIA	Comment that the Scoping Report does not address many of the key issues of the Proposed Development.	The Environmental Impact Assessment has been undertaken in line with the EIA Scoping Opinion (**ES Volume 4, Appendix 5.2 [EN010158/APP/6.4] [APP-080]**) and includes an assessment for all environmental factors that have been requested by the Planning Inspectorate to be scoped into the EIA. A detailed breakdown of the Scoping Opinion and the Applicant's response is set out in **ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4] [APP-081].**

Table 2-20: Twyford Parish Council

Reference number	Theme	Matter raised	Response
RR-275	Landscape and visual	Comment that there would be a negative visual impact on the landscape.	An assessment to determine the likely significant effects on landscape and visual amenity is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. As set out in the **Design Approach Document [EN010158/APP/5.9] [APP-038]** the relevant extracts from local landscape character studies (LCT/LCA), including the special qualities of the Quainton-Wing Hills Area of Attractive Landscape have been used to inform the approach to good design. The assessment includes evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors, through new hedgerow and tree planting and the sowing of wildflower rich grassland maintaining a vegetative ground cover throughout

			the majority of the Site as secured in the **Outline LEMP [EN010158/APP/7.6]** [APP-142]. In spite of these mitigation measures, the Applicant acknowledges that significant adverse residual landscape effects would remain. Section 10 of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027] concludes with a consideration of the Planning Balance and justifies how the urgent need for an unprecedented capacity of new solar generation, as demonstrated in the **Statement of Need [EN010158/APP/5.6]** [APP-036], outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.
RR-275	Alternatives	Comment that alternative methods of power generation should be explored by the Applicant as opposed to the Proposed Development.	The **Statement of Need [EN010158/APP/5.6]** [APP-036] explains that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector." The Statement of Need explains that there is an urgent need for an unprecedented capacity of new solar schemes to come forward to meet the government's energy policy aims, and at Section 3.9 provides information on the capacity ranges established by the government to meet those aims. The consideration of alternative renewable technologies is set out within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047]. This concludes

			that solar technology was the most appropriate renewable energy generating solution for the Site. Chapter 8 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** also provides evidence on the suitability of the proposed location from a grid operability and connection availability perspective and this Chapter should be read together with **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** **[APP-047]**. Section 7.7 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** also provides evidence on the suitability of solar for onshore generation in relation to the annual energy generation per unit of area of land, in comparison to other forms of electricity generation.
RR-275	Need	Comment that the proposed capacity of the Proposed Development is excessive to national requirements.	As noted within the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**, the Proposed Development consists of a solar farm and associated infrastructure including battery energy storage with a total capacity exceeding 50MW connecting to an existing section of the National Electricity Transmission System at East Claydon. The **Statement of Need [EN010158/APP/5.6]** **[APP-036]** also sets out the compelling case for the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes and explains that access to the

			UK's electricity network is limited. Therefore, using the available and currently underutilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. Through the design of the Proposed Development, the Applicant seeks to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target.
RR-275	Soils	Comment that reinstatement land used for solar back to agricultural land is impossible.	During the operation of the Proposed Development the soil would have no agricultural pressures and be under either a managed grassland or grazing scheme. The soil would therefore have an increase in soil carbon which would help improve structure and the soil's mycorrhizal fungi network. The effects on soil during the operational (including maintenance) are described within the **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2] [APP-055].** Soil mitigation measures are outlined within the **Outline SMP [EN010158/APP/7.7] [APP-143]**. Industry standard guidance has been followed to ensure the soils are being protected and managed correctly. Agricultural land would be reinstated

			following decommissioning, with any potential damage to the soil being reversible and temporary. A soil aftercare and monitoring plan would be employed on the Proposed Development to ensure soils would be reinstated to their pre-construction quality. This plan was designed through engagement with Natural England and is located within the **Outline SMP [EN010158/APP/7.7] [APP-143]**.
RR-275	Misc	Comment that the Proposed Development is motivated by profit.	The Applicant is bringing forward the Proposed Development to meet an urgent national need for an unprecedented capacity of clean, secure and affordable sources of electricity. Further information on this is provided within the **Statement of Need [EN010158/APP/5.6] [APP-036]**.
RR-275	Traffic and transport	Comment that the local area is unsuitable for construction vehicles.	The Applicant has carefully considered and fully assessed the potential impacts of the Proposed Development on the local road network. Full details are provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** Following the implementation of mitigation measures (detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**), the local road network is considered suitable for HGV traffic.
RR-275	Supporting infrastructure	Comment that there is an impact from the BESS and Rosefield Substation.	The Applicant has assessed the potential environmental effects of all components of the Proposed Development as part of its Environmental

			Impact Assessment, including the BESS and Rosefield Substation. The environmental assessments have been undertaken in accordance with applicable legislation and guidance which has been tailored to each environmental factor of the EIA using industry standard methods and criteria, and professional opinion where appropriate (see **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048]** for further information). Further detail on the assessment approach and methodology applied to each environmental factor assessment is presented within the respective environmental factor assessment chapters.
RR-275	Safety	Comments that there are concerns about fire risk from the Proposed Development, including access to the site and lack of local resource.	The Applicant has applied industry best practice to the design of the Proposed Development, including the BESS. This includes the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**.

	The Applicant has ongoing dialogue with stakeholders such as the UK Health Security Agency and Buckinghamshire and Milton Keynes Fire Authority. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]**) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). In the very unlikely event that a battery fire did occur, it would be limited to one enclosure due to the design of the BESS site. The assumption is that minimal intervention from Buckinghamshire and

Milton Keynes Fire Authority is required during a thermal runaway event. Boundary cooling of adjacent equipment could be carried out, and the BESS unit under thermal runaway would be allowed to burn out to remove the risk of stranded energy in the battery system.

A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low.

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

Along with the **Outline BSMP [EN010158/APP/7.9] [APP-145]**, the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** sets out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed

	design stage, the Applicant would mutually agree an Emergency Response Plan with Buckinghamshire Fire and Rescue Services, setting out how they would respond to any BESS event.

2.4. Non-statutory organisations

2.4.1. The table below set out the responses to the Relevant Representations from non-statutory organisations and the response from the Applicant.

2.4.2. The Applicant has submitted or intends to submit Statements of Common Ground with the following non-statutory organisations:

- Claydon Solar Action Group (TBA)
- National Trust (Deadline 1)

Table 2-21: Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust

Reference number	Theme	Matter raised	Response
RR-020	Principle of development	Comments about the scale and location of the Proposed Development, including that it is too large, that it is inappropriately sited due to the presence of high value ecological habitats and species in and around the Order Limits, and that there has already been impacts in this location due to other projects in the local area.	The **Statement of Need [EN010158/APP/5.6] [APP-036]** sets out the compelling case for the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes and explains that access to the UK's electricity network is limited. Therefore, using the available and currently underutilised capacity on the transmission line to which National Grid East Claydon Substation connects is critical

to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. Throughout the design of the Proposed Development, the Applicant seeks to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target.

The full detailed assessment of the potential impacts on biodiversity is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and specific concerns regarding the assessment raised by BBOWT are addressed in the section below.

Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches.

ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103] shows that the Proposed Development would have a significant positive net gain for biodiversity.

			Potential cumulative impacts arising from other projects has been robustly assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060].**
RR-020	Embedded mitigation measures	Comment that the offset of 30m to statutory and locally designated wildlife sites (which are all ancient woodland) is not considered to be adequate with request to extend this to a minimum 50 metre offset between the Proposed Development and ancient woodland in line with advice from The Woodland Trust.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** assesses the potential effects of the Proposed Development's construction, operational (including maintenance), and decommissioning on biodiversity and is supported by extensive survey work including **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4] [APP-099].** In relation to the VALP policy for a 50m buffer from ancient woodland, Design Commitment C1 within **Design Commitments [EN010158/APP/5.9.2] [AS-018]** secures that perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing ancient woodlands while Design Commitment D3 confirms that such perimeter fencing would comprise timber post and wire mesh 'deer-proof fencing'. Whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodlands, the Proposed Development is considered to be of a

less impactful nature than what constitutes 'general development' in the VALP.

Furthermore, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance [Ref. 1-31] makes clear that "for ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage". Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.

ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050] confirms that, across all phases of the Proposed Development, there would be no loss of ancient woodland and, therefore, no need to mitigate this. Further, the biodiversity assessment presented **in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060] does not conclude any significant residual inter-project cumulative effects with regard for ancient woodland or ancient trees, in accordance with this Policy.

The **Design Commitments [EN010158/APP/5.9.2]** [AS-018] secures embedded mitigation measures which include but are not limited to the planting of new hedgerows, native woodland belts and scrub planting within

			the buffers. These measures are further secured in the Proposed Development's design which proposes the planting of approximately 8.78ha of structural tree planting and approximately 4,336 linear meters of structural hedgerow planting (as secured in the **Outline LEMP [EN010158/APP/7.6]** [APP-142]) which is a substantial net gain, factoring the construction-phase need for small scale removal.
RR-020	Embedded mitigation measures	Request for the removal of solar PV from Fields D28 and D29 due to these fields being particularly important flight routes for commuting and foraging bats between Runts Wood to the north, and Finemere Wood to the south and that these fields are instead used for biodiversity compensation.	The Applicant does not consider the removal of solar panels from these fields to be required. The **Statement of Need [EN010158/APP/5.6]** [APP-036] sets out the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes. The Statement of Need also explains that access to the UK's electricity network is limited, and therefore that using the available and currently underutilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. In this regard, the Applicant has sought to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and plans in support of achieving the

government's ambition to achieve its Clean Power target.

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

- Field D27, adjacent to the eastern edge of Runts Wood.
- Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI.

Instead, these areas would provide mitigation areas for bats including increased foraging resources, woodland edge habitat and connectivity.

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

Early planting and habitat management is proposed along the boundary of Fields D30, D29 and D28 and hedgerows along boundary of Fields D30, D34 and D37 ahead of construction activities starting. This strategic planting would aim to

			improve foraging and commuting habitat for bats between woodland blocks and improve connectivity across the Site and to the wider landscape. Survey work using paired static detectors outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has confirmed the importance of hedgerows for foraging bats giving confidence that the approach to mitigation is correct one and would likely maintain habitat connectivity and reduce fragmentation for foraging bat species.
RR-020	Embedded mitigation measures	Comment that current proposed offsets from field boundaries and hedgerows are insufficient, with request for 'green corridors' such as that proposed in Parcel 2 to the north of Runt's Wood to be repeated across the Order Limits where there are key areas for bats commuting and foraging identified. Request for a minimum 15m buffer between development and hedgerows which should be maintained as dark corridors and of appropriate semi-natural priority habitat.	The Applicant is not proposing to repeat the approach to buffers that has been taken to the north of Runts Wood, across the whole Order Limits. The sensitivity of the location of the Proposed Development, particularly with respect to commuting and foraging bats, is acknowledged. In response, in addition to the removal of several fields that have been flagged as important for bats from the developable area, significant buffers have been incorporated into the embedded design to provide for the retention of existing habitats. In addition, following consultation with Natural England and where survey work has identified a specific requirement the minimum buffers have been increased:

- a minimum 20m offset from HS2 woodland planting (adjacent to Parcel 1) to the fence line of the Solar PV modules;
- a minimum 30m offset from all fence lines to statutorily, locally designated wildlife sites, ancient woodlands and existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28;
- a minimum 20m offset from all fence lines to existing woodlands;
- a minimum 15m offset from all fence lines either side from existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11;
- a minimum 10m offset from all fence lines to existing hedgerows;
- Retention of all ponds located within the Order Limits and a minimum 10m offset from all fence lines to existing ponds; and
- a minimum offset of least 10m either side of Main Rivers, ditches and ordinary watercourses and offset at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21 to all fence lines.

			The **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** secured via the **Outline LEMP [EN010158/APP/7.6] [APP-142]** already commits to a minimum 15m buffer between the developable area and hedgerows and a minimum 20m budder from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11 (5m from solar panels to the security fence and then 10m from the security fence to hedgerows and 15m from security fence to hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11) which would be maintained as dark corridors and managed to promote semi natural habitat of value to foraging bats.
RR-020	Surveys	Comment on surveys undertaken to inform conclusions in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** which are discussed in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (PEA) 2025 [EN010158/APP/6.4] [APP-093]** including:	• CIEEM Guidance[9] on the lifespan of ecological reports does suggest that ecological surveys may need to be updated depending on a variety of factors including the age of the survey date together and whether there has been any significant material changes to the habitat composition and distribution on Site, stating that an ecologist should use professional

[9] CIEEM advice note on the lifespan of ecological reports. Available online accessed 27/01/2026. https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/

- That ecological surveys are typically valid for 2 years and therefore surveys that are now out of date cannot be relied upon to draw conclusions about the current ecological baseline. Specific reference made to a botanical survey undertaken in June 2023 to identify arable weeds, eDNA surveys for great crested newt in 2022 and 2021, otter and water vole surveys in 2023, aquatic surveys in June 2023.
- That surveys should be undertaken at the correct time of year (specific reference to paragraph 2.5.1 of the PEA) and where this has not happened the results cannot be relied upon.
- That there is insufficient evidence in the PEA provided to justify the habitat classifications. Species lists are provided but there are no other details of, for example, abundance and structure, which are necessary to determine the habitat classification.
- That surveys should be undertaken for species now scoped into assessment including: terrestrial invertebrates with particular reference to black and brown hairstreak butterfly eggs, saproxylic

judgement to determine if ecological surveys need to be repeated. It also needs to be recognised that all survey work is a snapshot in time and what is important is that the survey data is sufficient to inform the ecological assessment. It is the Applicant's view that the survey data collected, some of it covering multiple survey years, is more than sufficient to inform the ecological assessment. It should also be noted that the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and the **Outline CEMP [EN010158/APP/7.2] [APP-138]** do contain commitments to update species specific survey work prior to construction, for example in relation to badgers and other legally protected species.

- Paragraph 2.5.1 of the **Preliminary Ecological Appraisal (2025)** (**ES Volume 4, Appendix 7.7 [EN010158/APP/6.4] [APP-093]**) has not identified any significant constraints relating to the timing of survey work. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** does state that less conspicuous plant species (including INNS) may have been missed as a result of the survey being undertaken outside of the ideal survey season, however the chapter goes on to state 'the majority of plants present were confidently identified, and the survey was sufficient to

	invertebrate surveys due to presence of deadwood, reptile surveys.	make a broad assessment of the habitats present on the Site', therefore this isn't considered to be a constraint. • Habitat survey work was undertaken (**ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4]) [APP-093]**) using the UK habitat methodology for which it is not a requirement to record extensive details of species abundance or habitat structure. The species lists and descriptions outlined in the **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4]) [APP-093]** are robust and sufficient to determine habitat type. In addition, habitat condition assessment has been undertaken to inform the Biodiversity Net Gain Calculation and the condition assessment sheets are included within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]**. • Given that the Applicant knows that both species of hairstreak are present and rely on blackthorn the presence of both has been assumed for the purposes of the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. In addition the **Outline CEMP [EN010158/APP/7.2**] **[APP-138]** makes a commitment to survey all hedgerow sections to

			be removed for Hairstreak species so that the sections containing overwintering eggs can be safeguarded. • Targeted survey work for other invertebrate species has not been undertaken, on the basis that habitats most likely to support specialist invertebrates have been mainly (hedgerows and individual tress) or all (ancient woodland) retained and that the habitat directly affected (arable and modified grassland) is highly unlikely to support an invertebrate assemblage any importance. The habitat creation and enhancement measures outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** are considered likely to benefit the invertebrate assemblages present.
RR-020	Designated sites	Comments that the Order Limits is adjacent to several blocks of ancient woodland designated as either SSSI or LWS with disagreement that residual effects during construction and operation of the Proposed Development on these woodlands would not be significant, due to land within the Order Limits currently offering a semi-permeable landscape for wildlife which reside in these woodlands as well as supporting its own habitats.	There is no direct development on any woodland areas as a result of the Proposed Development and all woodland habitat would be retained. It should be noted that in its **Relevant Representation [RR-203]** Natural England has confirmed that: *"Potential direct and indirect impacts to the interest features of the SSSIs have been appropriately assessed. Natural England agree with the conclusion that there are no residual impacts (after mitigation) on SSSIs."*

	Concern that fencing and solar PV would fragment and isolate woodland and species within them, with request for these areas to be improved for connectivity by developing semi-natural habitats between them. Reference to local (Vale of Aylesbury Local Plan 2013-2033, Policy NE1) and national policy (NPPF paragraph 193) which states that development should avoid protected sites.	There would be a minimum 30m buffer between the developable areas and ancient woodland and 20m from non-ancient woodland types. These and the buffers from hedgerows together with other specific measures have been embedded into the design of the Proposed Development. This also includes the removal of proposed Solar PV from a number of fields, including from: • Field B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood; • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane; • Field D27, adjacent to the eastern edge of Runts Wood; and • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI. Instead, these areas would be used to provide semi natural habitat for species. These measures are outlined and secured within the **Outline LEMP [EN010158/APP/7.6]** [APP-142].

			The fencing would only be in the middle of fields with a 10m buffer to boundary features such as existing hedgerows and water courses and a minimum 30m buffer from ancient woodland and 20m from non-ancient woodland types so species would be able to move though the landscape through these buffers. The management of the hedgerows and buffers is designed to reduce fragmentation and maintain connectivity. In addition, the areas proposed for Solar PV modules are divided into three discrete areas with large areas with no proposed development and large areas set aside for ecological mitigation which would be managed as semi natural habitat. With direct regard for planning policy in the Vale of Aylesbury Local Plan 2013-2033 and the NPPF, Tables 6 and 4 respectively of the **Policy Compliance Assessment Tables** at Appendix 4 to the **Planning Statement [EN010158/APP/5.7.2]** [AS-027] note that, for protected sites, **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] concludes that there are no likely significant residual adverse effects expected on internationally or nationally important Protected Sites.
RR-020	Bats	Comments on conclusion within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] that there	Dealing with each of the points raised in turn:

is the potential for an adverse, long-term and permanent, residual effect on commuting, foraging and roosting bats which, for Bechstein's bat, would be potentially significant at the District level, including:

- That the wider landscape is important for bat populations including Bechstein's, Brandt's, whiskered and barbastelle.
- That there is further development proposed in the area which may further fragment and isolate bat populations within different ancient woodland blocks.
- That hedgerows and open fields are important to bats in the area for commuting and foraging which would impacted by the Proposed Development.
- That research suggests solar farms can deter bats and further research is required to understand potential causes such as loss of suitable habitat, fewer insect prey available, impacts on echolocation, and collision risk with the panels.
- Disagreement that the "potentially significant" impacts to Bechstein's bats

- **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has fully recognised and acknowledged the sensitivity of the local environment and the wider environment and its importance to roosting and foraging bat species. This chapter has recognised that there is the potential for a significant residual effect on foraging bats.
- Potential cumulative impacts arising from other projects has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.
- It is fully recognised that the proposed development includes habitat located within the Core Sustenance Zone of Bechstein's bats (though much of this is currently of lower value to bats) and the design of the Proposed Development has been deliberately designed to provide for the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches.
- Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland

would not amount to, nor equate to, "significant harm."

- Disagreement that impacts on Barbastelle and other species of bats are not significant, despite the conclusion that impacts are assessed as being potentially adverse, long-term and permanent.
- That local (Vale of Aylesbury Local Plan 2013-2033, Policy NE1 (d)) and national policy (NPPF paragraph 193 (a)) protects against significant harms to biodiversity.

and arable margins along with scrub and tree planting along with 93 ha of fields that would be managed as open grassland. This would create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. These measures are outlined and secured within the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. It should also be recognised that large parts of the Order Limits (for example the cable route) would be subject to short term temporary impacts but would then be returned to existing agricultural management, so available to foraging bats as is currently the case.

- The Applicant is fully cognisant of the scientific literature with regards the potential displacement of some bat species due to solar panels and a detailed review of this information has informed the assessment within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050].
- With regards to comments on the conclusion that "potentially significant" impacts to Bechstein's bats would not amount to, nor equate to, "significant harm", Paragraph 5.4.42 of NPS EN-1 (2024) establishes a general principle which is that the mitigation hierarchy should be applied to *"avoid 'significant harm' to biodiversity and geological conservation*

interests". **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** outline that, following the application of the mitigation hierarchy, there remains *potentially significant* effects on Bechstein's bats but, importantly, these are concluded as not amounting to, or equating to, 'significant harm' in the assessor's view.

- As stated within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** (paragraphs 7.10.132 and 7.10.133), the limited evidence currently available broadly suggests that adverse effects may be felt by some bat species as a result of solar farm operation, although the exact nature and extent of these impacts is not yet clear. Therefore, while the embedded design and additional mitigation, including reinstatement of hedgerows and creation and/or improvement of foraging habitats and linear features, are considered to be effective means of minimising the impacts on Bechstein's bat, it is not possible, at this time, to definitively state that this mitigation would be fully efficacious and therefore residual impacts cannot be fully discounted. Therefore, with due consideration to the status of the Bernwood Bechstein's bat population and the

			assessment of its National importance, a precautionary approach has been applied and the residual effects of the operation (including maintenance) of the Proposed Development are assessed as potentially being adverse, long-term and permanent for the duration of the operation (including maintenance) phase, in light of Bechstein's bat lifespans, and therefore potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts will be of a scale that will not impact the overall favourable conservation status of the species as the Proposed Development design and mitigation has focused on protecting and enhancing Bechstein's bat foraging and commuting habitat. • With direct regard for planning policy in the Vale of Aylesbury Local Plan 2013-2033 and the NPPF, this is discussed in Tables 6 and 4 respectively of the **Policy Compliance Assessment Tables** at Appendix 4 to the **Planning Statement [EN010158/APP/5.7.2]** [AS-027].
RR-020	Birds	Comments on conclusion within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] that for	The Applicant respectfully disagrees with the comments raised.

	ground nesting birds, non-ground nesting birds, barn owl, red kite, hobby, peregrine falcon and wintering birds the residual effect of the Proposed Development would not be significant, including: • That the conclusion that there would be a long-term beneficial effect on ground nesting birds (significant at the local level) is flawed. • That assemblages present on site are considered to be of County ecological importance and a significant number of species could be impacted. • That the quantification of mitigation required for skylark outlined in the Outline LEMP is flawed and it is likely adjacent territories of skylark would be lost as well as those directly within the area of solar PV coverage due to requirement for open fields for nesting, and therefore the effect on skylark and other ground-nesting birds is likely to be significant.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has fully recognised the value of both the breeding and wintering bird assemblage. Skylark and other ground nesting birds do indeed need open ground for nesting which is why the mitigation measures outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** include the establishment of over 90ha of fields that would be managed as open grassland to support ground nesting species in addition to the other suite of mitigation measures. The provision of winter seed source for granivorous species together with management of the grassland within fields proposed for Solar PV to increase the insect diversity is likely to support a greater foraging resource for farmland birds than exists currently. Indeed, recent work by the RSPB[10] has shown that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape. Wintering birds are highly mobile and use a variety of habitat types including woodland, hedgerows field margins and open field. The measures

[10] Solar farm management influences breeding bird responses in an arable dominated landscape. Joshua P Coping et al, Bird Study 2025, Vol 2.No 3, 217-222. Paper by RSPB and Cambridge University.

		• That there would be a loss of habitat for wintering bird populations.	outlined in the **Outline LEMP [EN010158/APP/7.6]** [APP-142] include the retention of all woodland, not just ancient, the vast majority of hedgerows and extensive riparian buffers to these habitat types in addition to the provision of 93ha of open grassland. It should also be recognised that large parts of the Order Limits (for example the cable route) would be subject to short term temporary impacts but would then be returned to existing agricultural management so available to foraging birds as is currently the case.
RR-020	Lake effect	Concern that potential impacts of a 'lake effect' on bats, birds and invertebrates has not been considered as part of the assessment on these species, which undermines its conclusions. Specific reference made to potential impacts such as birds landing on solar panels, collision by birds and bats feeding and landing, attraction of aquatic insects to the panels.	The risk of the lake effect and other impacts concerned with light polarisation have been fully assessed within the ecological assessment (see paragraph 7.8.120 in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]). However, it is important to note that the proposed Solar PV modules would be bifacial with an anti-reflective coating to reduce light polarisation impacts. In addition, individual fields proposed for Solar PV 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. While typical bat flight heights vary amongst the species within this grouping, the majority of bats would fly higher than the 3.5m height of the solar PV panels and are therefore unlikely to otherwise be at significant risk from collision[11] .

Barbastelle bats almost exclusively feed on moths[12] and while a small number of UK moths have an aquatic life stage, it is considered likely that moths may be less impacted by mistaking the surface of panels for waterbodies. As noted above, the use of coatings on Solar PV modules to minimise the impacts of light polarisation is

[11] 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
[12] Diezt, C., and Keifer, A. (2016) Bats of Britain and Europe. Bloomsbury Publishing Plc. London

likely to further limit any potential impacts on the bat prey resource by insects mistaking panel surfaces for waterbodies.

The trawling foraging behaviour of Daubenton's bat may place it at greater risk of impact due to light polarisation from the Solar PV modules, both in relation to increased collision risks from attempting to forage over Solar PV modules and potential changes in prey distribution and/or abundance. However, it should be noted that there are no notable sizeable waterbodies present within the Site or in the 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.

Invertebrates:

Invertebrates have also been found to be impacted by how Solar PV modules polarise light, resulting in the attraction of a range of invertebrate species; in particular, species with an aquatic life stage.

As stated above, many modern Solar PV modules have anti-reflective coatings intended to minimise light polarisation and thereby reduce the impact on invertebrate species.

Birds:

A comparative study by Montag et al. (2016)[13] 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 considered in the study. They attributed these benefits to the more diverse habitat providing better foraging and the availability of perching opportunities on the solar panels.

Research from the RSPB and University of Cambridge as part of the Centre for Landscape Regeneration found that, hectare for hectare, solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than surrounding arable farmland. Solar farms managed with nature in mind as and in areas with a greater mix of habitats proved the best performers, having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland[14]. This would be the case for the Proposed Development, as evidenced by the proposed embedded mitigation which includes a variety of habitats

[13] Montag, H., Parker, G. and Clarkson, T. (2016). The effects of solar farms on local biodiversity: a comparative study. Clarkson and Woods & Wychwood Biodiversity
[14] RSPB (2025). Solar farms managed for nature can benefit bird abundance and diversity. Available online: https://www.rspb.org.uk/media-centre/solar-farms-can-benefit-bird-abundance

			providing a mosaic of diverse habitats designed for the benefit of multiple species. Other studies have also identified birds using solar panels for perching, shade and providing nesting opportunities. Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies and that this would pose the greatest risk to migratory waterbirds. There is no evidence to directly support the 'lake effect'[15] (it should also be noted that there are no notable waterbodies present within the Site or immediate vicinity, and breeding bird surveys and wintering bird surveys did not identify large numbers of water birds across the Site. It has also been suggested that birds which drink on the wing (e.g. swallows) may be at risk[16], although evidence is again lacking.
RR-020	Bernwood Biodiversity	Comment that the Order Limits is located within the Bernwood BOA, and that the Proposed Development could jeopardise	The Applicant is aware that the Proposed Development is located within the Bernwood BOA, which is vast, covering 5870 ha. Consultation has

[15] Kosciuch, K., Riser-Espinoza, D., Gerringer, M., & Erickson, W. (2020). A summary of bird mortality at photovoltaic utility scale solar facilities in the Southwestern US. PloS one 15(4): e0232034.
[16] Bernath, B., Szedenics, G., Molnar, G., Kriska, G. and Horvath, G. (2001). Visual ecological impact of a peculiar waste oil lake on the avifauna: dual choice field experiments with water-seeking birds using huge shiny black and white plastic sheets. Archive of Nature, Conservation and Landscape Research 40: 1-28.; Harrison, C., Lloyd, H. & Field, C. (2017). Evidence review of the impact of solar farms on birds, bats and general ecology. Natural England, UK.

	Opportunity Area (BOA)	the aims of the BOA which is contrary to Policy NE1 of the Vale of Aylesbury Local Plan.	been undertaken with BBOWT and relevant consultees relating to these designations to discuss potential effects on the ecological network. It is considered that with the mitigation measures outlined in the **Outline LEMP [EN010158/APP/7.6]** **[APP-142]** the Proposed Development would not significantly jeopardise the aims of the BOA. In fact, habitats in the post-construction scenario would meet a number of the BOA aims; namely: • Proposed enhancement and creation of ponds within the BOA • Proposed and enhanced hedgerows within the BOA.
RR-020	Cumulative effects	Comment that there have been effects on wildlife and habitats as a result of High Speed 2 and East West Rail and there would be major cumulative effects in combination with the Proposed Development and other developments in the area.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** **[APP-060]** sets out that using the Precautionary Principle, there is anticipated to be a potential long term, adverse inter-project cumulative residual effect on Bechstein's bat due to the modification of habitat (installation of Solar PV modules) for the duration of the operation (including maintenance) phase, with other developments located within the Bechstein's bat Core Sustenance Zone. This would be potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would

			be of a scale that would not impact the overall favourable conservation status of the species, as the design of the Proposed Development and proposed mitigation measurs have focused on protecting and enhancing Bechsteins's bat foraging and commuting habitat.
RR-020	Mitigation and enhancement measures	Comments on the **Outline LEMP [EN010158/APP/7.6] [APP-142]**, including: • Support for its production and incorporation of recommendations from BBOWT. • That there is a lack of ambition in the proposals to improve the area for wildlife, with specific reference to habitat creation amongst the solar PV. • That stepping stones for wildlife should be created to move uninterrupted through the landscape, including 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. • That a detailed report on mitigating impacts on SSSI, LWS, and ancient woodlands adjacent and in close to	• The proposals for habitat creation amongst the Solar PV modules are considered to be realistic and appropriate given the shading produced by the panels themselves. Aiming for a higher distinctiveness condition grassland within the solar PV module areas is not appropriate. • The landscape and ecological mitigation measures and enhancements are designed to reduce fragmentation and ensure that wildlife could still move through the wider landscape and include species-rich field margins comprising a mosaic of scrub and species-rich grassland. Enhancement of existing hedgerows and new hedgerow creation is proposed. Five new ponds are proposed as described in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103].** • Potential effects on SSSI, LWS and ancient woodland have been fully assessed in **ES Volume 2, Chapter 7: Biodiversity**

		proximity to the Order Limits and species which use the sites should be produced. • That measures to reduce polarised light from the solar panels and to reduce density of the solar panels should be proposed e.g. coating measures, affixing of white grid patterns.	**[EN010158/APP/6.2] [APP-050]** with mitigation described and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. Therefore, the Applicant does not consider a separate report on mitigating effects is required. • As mentioned above the Proposed Development Solar PV modules would be bifacial with an anti-reflective coating, to reduce light polarisation impacts. In addition, individual fields proposed for Solar PV would be broken up significantly by retained woodland and hedgerows and the associated buffers.
RR-020	Biodiversity Net Gain Assessment	Comments on the **BNG Assessment** (**ES Volume 4, Appendix 7.17 [EN010158/APP/6.4] [APP-103]**) including: • Support for the proposed net gain in biodiversity which exceeds the minimum 10% requirement. • That concerns with the baseline surveys (timing of surveys and validity of surveys which are over 2 years old) affects confidence in the results. • That information on the number of quadrats completed and number of species per metre squared was assessed should be provided to enable confidence in the results.	• The Applicant has responded with regards to the age of survey data above. • No formal quadrat surveys were completed as part of the baseline surveys as no high distinctiveness grassland habitats were recorded. The number of species per metre squared was therefore based on surveyor estimates. This is considered sufficient to assign habitat types and complete BNG condition assessments. • The **Outline LEMP [EN010158/APP/7.6] [APP-142]** refers to the grassland under the solar PV modules as legume-rich modified grassland. This is a result of a difference between the landscape and ecology terminology for the

		• That there is a discrepancy between the **BNG Assessment** (**ES Volume 4, Appendix 7.17 [EN010158/APP/6.4] [APP-103]**) and the **Outline LEMP [EN010158/APP/7.6] [APP-142]** where the grassland under the solar PV has been mapped and entered into the metric as Other Neutral Grassland in poor condition, however the Outline LEMP states it will be managed as legume-rich modified grassland which will have a major influence on the overall metric.	same habitat type. The species-mix for the grassland would include a high proportion of legumes and it is considered that it would meet the criteria for Other neutral grassland. The grassland is predicted to contain over 20% cover of broadleaved herbs and sedges, have less than 30% cover of perennial rye grass and white clover and contain at least 1 grass species that is not generally sown for intensive agricultural production. Poor condition has been chosen to reflect the fact that shading from the panels would reduce the grassland condition. • The **Outline LEMP [EN010158/APP/7.6] [APP-142]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** will be updated at Deadline 1 to ensure consistency with habitat terminology.
RR-020	Biodiversity Net Gain Assessment	Comments that there is insufficient justification provided for the habitats and conditions selected in the **BNG Assessment** (**ES Volume 4, Appendix 7.17 [EN010158/APP/6.4] [APP-103]**) including: • Reference to section 3.3.3 of the BNG assessment which states the assumptions made from the Outline LEMP to determine which habitats have	Sections 3.3.3, 3.3.7 and 3.3.11 of **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** include a breakdown of how the **Outline LEMP [EN010158/APP/7.6] [APP-142]** habitats have been translated into UKHab metrics. Figure 2 of **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** includes a map of the UKHab post-development habitats which

	been entered into the metric, and that it is not always clear which habitats the Outline LEMP is referring to as the terminology has not been translated into or includes the habitat types in the statutory metric. • That it is not clear what habitat and condition pre-planting preparation is to achieve. • That it is not clear how each condition of other neutral grassland would be delivered in the different areas of the site, as currently only broad habitat management procedures have been provided without distinction for the different conditions, which should be provided now rather than at detailed LEMP stage to ensure each condition can feasibly be achieved as otherwise there could be a significant reduction in number of units achieved. • That further habitats need additional justification, including Mixed scrub; Modified grassland; Other woodland, broadleaved; Other woodland, mixed; Ponds; Hedgerows; Lines of trees; and Watercourses.	can be compared to the figures in the **Outline LEMP [EN010158/APP/7.6] [APP-142].** Habitat management prescriptions are outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103].** Detailed habitat management prescriptions for all habitat types would be included in the detailed Landscape and Ecological Management Plan/Habitat Management and Monitoring Plan at a later stage. This would specify what ecological condition pre-planting and other landscape measures is intended to be achieved. The targeted grassland condition is dependent on the location of the grassland which would impact the management prescriptions. The other habitats considered are based on the UK habitat survey so form part of the baseline. Section 3 of **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** indicates that habitat types chosen for enhancement and creation are appropriate delivering local biodiversity priorities.

RR-020	Principle of BNG	Comment that BBOWT disagrees with selling 'excess' on-site gains which undermines national aims, undermines genuine additionally and undermines the mitigation hierarchy.	The Applicant has committed within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** to delivering a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units, well above the 10% minimum required by the Environment Act.
RR-020	Principle of BNG	Comment that habitat creation could displace other land uses and lead to additional loss or degradation of habitats elsewhere which counteract on-site BNG, with reference to the need to compensate for loss of food production on the site by either additional conversion to, or intensification of, agricultural land elsewhere.	No habitat creation has been proposed on BMV land. Therefore, the best quality land would still be used for agricultural production or would be under a managed grassland scheme where the soil has an opportunity to increase soil carbon and improve soil structure. Any proposed areas for habitat creation are on land classed as Grade 3b or below which would help improve the soil quality and biodiversity.
RR-020	Decommissioning	Concern about the future of habitats within the Order Limits following decommissioning of the Proposed Development and commitment should be made that created habitats would remain and be managed in perpetuity.	Habitats created on Site would be managed for the operational (including maintenance) phase of the Proposed Development, with the assumption being that habitats (excluding new tree and hedge planting) would be returned to agricultural use at the end of the operational phase. Impacts arising from decommissioning would be assessed at the decommissioning stage in line with the **Outline DEMP [EN010158/APP7.4] [APP-140]** and this would include the potential loss of any gain in biodiversity which has occurred over the lifespan of the Proposed Development.

RR-020	Research	Comment that there is a lack of research about the impacts of solar farms on ecology and therefore a precautionary approach should be taken and the solar farm should not proceed until detailed assessments of the impacts of solar farms on biodiversity are carried out and the impacts of previously constructed solar farms in the UK known.	The Applicant is fully cognisant of the scientific literature with regards to the potential effects of solar panel on bats and this information has been used to inform the assessment undertaken. In addition, the Applicant has undertaken additional work to further inform the assessment in relation to bats and high frequency noise from electrical infrastructure which will be submitted at Deadline 1. The Applicant has committed within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** to a detailed post construction monitoring programme and is committed to funding additional research to inform the evidence base with regards to bats and solar panels. Recently, the Applicant has sponsored a PHD student in association with Exeter University looking at impacts of solar panels on biodiversity on its Longfield Solar Farm.

Table 2-22: Buckinghamshire Business First

Reference number	Theme	Matter raised	Response
RR-025	General comment	Comments in support of the Proposed Development in contributing to grid stability and long-term energy cost certainty, providing opportunities for local procurement and providing opportunities for skills and training.	The Applicant welcomes this comment and notes the potential benefits of the Proposed Development as summarised in the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**. Further information on the benefits of the Proposed Development towards the Government's aim to

			deliver a low-carbon, secure and affordable energy system to support Net Zero, is provided in the **Statement of Need [EN010158/APP/5.6]** [APP-036]. This includes benefits that the Proposed Development would bring to local communities surrounding the Proposed Development in regards to employment, workforce spending and GVA/supply chain benefits as set out in **ES Chapter 14: Population [EN010158/APP/6.2]** [APP-057]. An **Outline ESSCP [EN010158/APP/7.14]** [APP-150] has been submitted as part of the DCO Application which sets out how the Applicant intends to promote economic benefits for the community. The plan describes activities that would promote access to employment, upskilling and re-skilling opportunities for local people. These could include work experience placements, access to jobs, and joint Apprenticeships across industry partners. The above Plan also includes provision for working with schools to promote career opportunities available to young people within renewable industries, including those available local to their place or residence.
RR-025	Opportunities for collaboration	Comment that Bucks Business First would welcome opportunities to collaborate with the Applicant to deliver opportunities for local skills development, local jobs and supply chain opportunities. Suggestions include:	The Applicant welcome the opportunity to collaborate with Bucks Business First (BBF) to deliver opportunities for local employment, skills development and the inclusion of local businesses in the supply chain. Table 2.1 of the **Outline ESSCP [EN010158/APP/7.14]** [APP-150] sets out the key

	• Local procurement plan: A transparent supplier engagement programme, published pipeline and meet the buyer events; a dedicated supplier portal; clear KPI targets for spend with Buckinghamshire SMEs and social enterprises. • Skills & employment plan: Apprenticeships, T Levels and industry placements; site visits, talks and curriculum projects with local schools and colleges; targeted opportunities for underrepresented groups; and re /up skilling offers aligned to construction and clean tech roles. • Careers outreach: Ongoing sponsorship and participation in the Bucks Skills Show and Under 19s programmes, plus support for work experience (including short "work taster" formats) and mentoring. • Social value measurement: Adoption of recognised metrics (e.g. National TOMs or equivalent) with quarterly reporting to a local stakeholder panel. • SME readiness: Growth Hub-led workshops on procurement readiness, H&S, quality, and net zero supply chain	local stakeholders that the Applicant wishes to engage with in delivering the Detailed Employment, Skills and Supply Chain Plan and the potential key tenets of each relationship. This includes BBF. The Applicant engaged with BBF during the development of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**. Keenly aware of the importance of raising awareness of the Proposed Development across local institutions and embedding collaborative working at the earliest opportunity, the Applicant has entered into a partnership with BBF to become a 2025/6 sponsor for the Bucks Skills Hub and a BBF Ambassador and, as such, is supporting a range of activity aimed at delivering local economic benefits during that year. The Applicant would engage BBF in developing all aspects of the detailed Employment, Skills and Supply Chain Plan. Initial discussions would be crucial in framing practical and realistic ambitions for delivering benefits for local communities and businesses. Theme 3 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**, Opening Up the Supply Chain, sets out an outline framework for how the Applicant and contractors would embed within the procurement process actions to open up opportunities for local businesses to gain contracts. This includes clearly defining, and promoting

	standards to help local firms qualify and compete.	awareness of supply chain opportunities locally, including an online information sharing platform and process to enable businesses to register interest; and participation in market warming and Meet the Buyer events, which would clarify SME capacity and expertise requirements of the Applicant and Tier 1 contractors and offer advice and guidance on compliance. Theme 1 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**, Information and Collaboration, sets out an outline framework for providing insights into careers in renewable industries, including attendance at skills and careers fairs and the roll out of Destination Renewables in Colleges, promoting renewable careers opportunities for 16 – 18 year olds. Table 2.1 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** describes the Applicant's commitment to engage with the BBF Skills Hub and schools network. Theme 2, Access to Construction Employment, Up-skilling and Re-skilling, describes how the Applicant envisages that opportunities would include work placement opportunities. Paragraph 3.3.2 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** sets out how targeting parameters could be established for proactive recruitment drives and skills actions and that this could include residents from areas that fall

			within the top 20% most deprived areas in England for the Index of Multiple Deprivation education, skills development and training domain, as well as residents from the 10 Opportunity Bucks wards. Table 2.1 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** sets out how the Applicant envisages that BBF would support geographical targeting. Paragraph 4.1.1 of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** sets out how the delivery model would be underpinned by the key principles set out within the Construction Industry Training Board's National Skills Academy for Construction (NSAfC). The primary purpose of the NSAfC is to encourage new entrants into the construction industry and enhance construction skills. The model includes standard, industry designed and agreed Key Performance Indicators (KPI). These KPIs would be the key benchmarks against which performance in delivering the Detailed Plan would be assessed. The Applicant would establish a stakeholder working group to oversee the development, delivery and performance monitoring of the detailed ESSCP. This would include social value monitoring, incorporating the achievement of NSAfC KPIs.
RR-025	Mitigation	Comment that DCO requirements should be implemented to reduce environmental effects and ensure community liaison during the	The Applicant has included a number of outline management plans as part of its DCO Application which set out measures to reduce effects on the

lifetime of the Proposed Development to ensure sensitive delivery and environmental safeguards.

surrounding environment. Should consent be granted, the Applicant would be required (via Requirements in the **draft DCO [EN010158/APP/3.1.2] [AS-010]**) to prepare and comply with detailed plans which are substantially in accordance with the outline plans. These include:

- **Outline CEMP [EN010158/APP/7.2] [APP-138]**
- **Outline CTMP [EN010158/APP/7.5] [APP-141]**
- **Outline OEMP [EN010158/APP/7.3] [APP-139]**
- **Outline DEMP [EN010158/APP/7.4] [APP-140]**

Should the Application be granted consent, prior to the commencement of the construction phase, the Applicant would submit to the relevant planning authority for approval of the terms of reference for a Community Liaison Group whose aim is to facilitate liaison between representatives of people living in the vicinity of the Order Limits and other relevant organisations in relation to the construction of the Proposed Development.

This would provide a forum for discussion throughout the construction period, supplemented by a dedicated Community Liaison Lead to act as a point of contact should there be any queries outside of the forum. This is secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138]**.

While the CLG would not be in place during operation, updates would be given to the local

community and stakeholders at key milestones to maintain an ongoing relationship over the entire lifetime of the Proposed Development. There would also be contact details onsite and online for members of the community and stakeholders to contact the asset operations team.

Table 2-23: Callum Anderson MP

Reference number	Theme	Matter raised	Response
RR-027	Impact on landscape	Comment that the scale of the Proposed Development is concerning, with reference to cumulative effect on the local landscape.	The **Statement of Need [EN010158/APP/5.6] [APP-036]** sets out the compelling case for the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes. It also explains that access to the UK's electricity network is limited, and therefore that using the available and currently underutilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. In this regard, the Applicant has sought to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target.

			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 [APP-060]** and **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4] [APP-135]**. There is potential for an increase in significant cumulative effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill and Station House during operation (including maintenance) (Year 1 and Year 10); on the residents of Granborough during construction, operation (including maintenance) (Year 1); and for significant effects to extend for the full duration of operation (including maintenance) from the North Buckinghamshire and The Midshires Way. Section 10 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** concludes with a consideration of the Planning Balance and justifies how the urgent need for an unprecedented capacity of new solar generation, as demonstrated in the **Statement of Need [EN010158/APP/5.6] [APP-036]**, outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.
RR-027	Construction impacts	Concern that there would be disruption to the local community during the construction	An **Outline CTMP [EN010158/APP/7.5] [APP-141]** has been submitted as part of the DCO Application

		phase, with reference to experience of other major projects in the area such as HS2 and EWR.	to help reduce potential impacts during the construction phase. This has been informed and shaped by consultation and engagement, drawing on experiences of other infrastructure projects in the local area to ensure that proposed measures are appropriate and efficient. It includes provisions for collaboration with other developments, including the requirement for the Principal Contractor to consult with the HS2 Transport Officer to coordinate haulage operations on the access routes during the construction period. As demonstrated in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**, no significant cumulative effects are predicted as a result of this transport assessment.
RR-027	Use of agricultural land	Comment opposing the potential loss of agricultural land and impact on the rural economy in North Buckinghamshire.	Effects on the agricultural economy have been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. Overall, the temporary land-take associated with the Proposed Development would result in a maximum of up to 677ha being taken out of agricultural use – equivalent to 0.65% of agricultural land in Buckinghamshire - for the construction and operation (including maintenance) phases. Around 33% of this agricultural land would then be re-instated and be made available for agricultural activity during the operation (including maintenance) phase.

			Indicatively, this would result in the temporary, long-term reduction of the indicative capacity for up to around 10 FTE jobs, and temporary, short-term reduction of the indicative capacity for up to around 5 FTE jobs (total agricultural employment in Buckinghamshire is estimated at approximately 2,237 FTE jobs). The agricultural economy in Buckinghamshire is substantial and subject to annual and seasonal variations in employment supported which is far greater than the scale of the indicative loss in employment capacity (and actual known employment). The Proposed Development would also deliver socio-economic benefits during the construction and operational (including maintenance) phases – up to 600 FTE jobs during the construction phase, and up to 24 during the operational (including maintenance) phases.
RR-027	Planning process	Comment that a number of solar farms have been approved in the local area, and that planning decisions should be strategically co-ordinated to reduce cumulative impacts with reference to the forthcoming Land Use Framework.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) details that there is no standard methodology for the site selection of solar farms. The site selection methodology for the Proposed Development has therefore been informed by the following relevant national and local policy documents and regulations: NPS EN-1 (2024), NPS EN-3 (2024), NPS EN-5 (2024), the NPPF, the

	VALP 2013 – 2033, the NPPG and the EIA Regulations 2017. Paragraphs 2.10.23 to 2.10.25 of NPS EN-3 (2024) establish that the starting point for the site selection process can be determined by the availability of a nearby and suitable connection to transmission network. Recent Solar NSIP decisions have confirmed that the Planning Inspectorate and Secretary of State supports the application of this approach to commencing the site selection process. An assessment of the cumulative effects with other existing developments and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060].** This assessment considers the potential combined impacts of the Proposed Development alongside other nearby projects. With regard for the forthcoming Land Use Framework, the Applicant understands that this new approach is seeking to optimise Land Use in England and improve spatial planning. The Land Use Framework is also seeking to create a toolkit which empowers decision makers when it comes to delivering on the Government's Plan for Change. The Plan for Change milestones of particular importance to the Proposed Development are multifaceted and include, but are not limited to, the

			securing of home-grown energy and accelerating the deployment of clean power.
RR-027	Timescales	Comment that the Applicant cannot deliver the Proposed Development in line with its timescales.	The Applicant respectfully disagrees. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** notes that, subject to being granted consent, the earliest the Proposed Development's construction phase is anticipated to commence is mid to late 2029. The Proposed Development currently has a grid connection date of Q4 2031. It is currently anticipated that construction works would commence in mid to late 2029 and run to 2031 which aligns with the connection date. There is a potential likelihood of overlapping construction works on different parts of the Site.
RR-027	Community benefit	Comment that substantial community benefits should be provided including energy discounts and community fund.	The Applicant intends to provide benefits for the community through the enhancement of PRoWs and permissive paths, a Community Fund and creating direct and indirect beneficial effects associated with employment, skills and education. The Applicant intends to promote economic benefits for the community through the activities set out in the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**. The plan describes activities that would promote access to employment, upskilling and re-skilling opportunities for local people. These could include work experience placements, access to jobs, and joint Apprenticeships across industry partners.

The above Plan also includes provision for working with schools to promote career opportunities available to young people within renewable industries, including those available local to their place or residence.

The Applicant is proposing to enhance the existing PRoW network and provide three new permissive paths to improve connectivity within the area and around the Order Limits. These are secured by the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.2] [AS-007]**.

In addition, the Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community.

Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The total amount of funding would be based on the final installed capacity of the Proposed Development. The Community Fund would be index linked from the first payment, with the RPI base rate linked to the operation date of the Proposed Development and reviewed annually.

Table 2-24: Claydon Solar Action Group Limited

Reference number	Theme	Matter raised	Response
RR-049	Conservation area	Comment that the Order Limits surround the southern part of the Botolph Claydon Conservation Area.	As set out more fully in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the design of the Proposed Development has evolved to consider views from Botolph Claydon and the Botolph Claydon Conservation Area. Four fields closest to the Conservation Area were no longer considered for solar following Phase One Consultation, to reduce potential effects on residential properties and the setting of Botolph Claydon and the Botolph Claydon Conservation Area. Following Phase Two Consultation, these fields were removed from the Order Limits altogether and the closest part of the Order Limits is approximately 175m from the Conservation Area. These changes have ensured that the Proposed Development is no longer visible from the Conservation Area and that the Conservation Area would continue to be experienced within a largely agricultural setting on the approaches from the west and north. The changes to the approach to the Conservation Area from the south have been assessed within the detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106]), the harm to the significance of the Conservation Area was concluded to be less than substantial. Historic England concurs with this assessment as noted in its **Relevant Representation** [RR-109].

RR-049	Impact on villages	Comment that the Proposed Development is too close to the Claydon villages which has impacted their historic setting.	As set out in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the design of the Proposed Development has evolved to consider views from the Claydon villages and their settings. Four fields closest to the southern edge of Botolph Claydon were no longer considered for solar following Phase One Consultation, to reduce potential effects on residential properties and the setting of Botolph Claydon and the Botolph Claydon Conservation Area. Following Phase Two Consultation these fields were removed from the Order Limits altogether. Following Phase One Consultation Fields D8, D9, D18 and D19 were no longer proposed as an option for the Rosefield Substation, to reduce potential visual effects for residents of Botolph Claydon, and a potential location for the BESS in Parcel 3 was reduced in size from the potential BESS location indicated previously, to take account of landscape and visual assessments. In response to feedback received during Phase Two Consultation, the BESS and Rosefield Substation is no longer proposed in Field E23 of Parcel 3, in part to address feedback in relation to views from Botolph Claydon and East Claydon. The impacts to the significance of the designated and non-designated heritage assets within the Claydon villages (Botolph Claydon Conservation Area, Middle Claydon Conservation Area and East Claydon village, along with the listed buildings within each of these villages) have been considered within **ES Chapter 9: Cultural Heritage [EN010158/APP/6.2]** [APP-052] with supporting detailed assessments in **Annex D** of **ES Volume 4, Appendix 9.1:**

			Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]. The Applicant concluded that the harm would be less than substantial, a conclusion which Historic England concur with for those assets which it has considered within its **Relevant Representation [RR-109]** (Botolph Claydon and Middle Claydon Conservation Areas).
RR-049	Biodiversity	Comment that there is a loss of habitat for biodiversity as a result of the Proposed Development.	The Applicant has strived to keep habitat loss to a minimum. The habitats to be lost are arable land, modified grassland and some hedgerow sections (the majority of which would be reinstated) and 16 individual trees. Significant planting gains are proposed, including approx. 8.78ha of structural tree planting and 4,336 linear meters of structural hedgerow planting and over 400 new trees. A total of 88.8ha of whole fields have been set aside as proposed areas for mitigation and/or enhancement. Mitigation has been designed to retain the most ecologically important habitat and reduce fragmentation and ensure connectivity across the wider landscape. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity. The Applicant has committed to delivering a minimum net gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units, well above the 10% minimum required by the Environment Act.
RR-049	Mitigation	Comment that the scale of change as a result of the Proposed	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is

	Development would not be able to be mitigated.	required by Government policy to address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of schemes improves their economic efficiency, bringing power to market at the lowest cost possible. It is shown that larger schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity. The **Statement of Need [EN010158/APP/5.6]** [APP-036], which supports the Application, provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2]** [AS-027] sets out the reasoning for the Proposed Development, including its size and location. Following Phase Two Consultation, the design of the Proposed Development has been reviewed and revised to take account of stakeholder engagement, technical assessment and advice, and the outcomes of the Environmental Impact Assessment. This has included amendments to the Order Limits and potential areas for Solar PV development as set out with the **Design Approach Document [EN010158/APP/5.8]** [APP-038]. This resulted in an overall reduction of the Order Limits to 675ha (compared to 875ha at Phase One and 744ha at Phase Two).

			The Applicant respectfully disagrees with the comment that impacts of the Proposed Development cannot be appropriately mitigated and believes that the mitigation outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and detailed and secured by **Outline LEMP [EN010158/APP/7.6] [APP-142]** to address the impacts of the Proposed Development is robust and sufficient to address the potential effects identified.
RR-049	Bats	Comments that land within the Order Limits support a highly vulnerable breeding colony of Bechstein's Bats which rely on the blocks of ancient woodland adjacent to the western part of the Order Limits. Comment that there has already been large-scale change in the landscape through development in the area, particularly HS2 and it is not yet known how effective mitigation and compensation measures associated with these projects have been, with concern their success may be affected by the Proposed Development.	The full detailed assessment of the potential impacts on bats is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**.This has taken a precautionary approach and indicated that there may be a *potential* significant residual impact on Bechstein's bats due to the Proposed Development. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** sets out that using the Precautionary Principle, there is anticipated to be a potential long term, adverse inter-project cumulative residual effect on Bechstein's bat due to the modification of habitat (installation of Solar PV modules) for the duration of the operation (including maintenance) phase, with other developments

			located within the Bechstein's bat Core Sustenance Zone. This would be potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would be of a scale that would not impact the overall favourable conservation status of the species, as the design of the Proposed Development and proposed mitigation measures focuse on protecting and enhancing Bechstein's bat foraging and commuting habitat.
RR-049	Bernwood SSSI	Comment that the Proposed Development would impinge on Natural England's ambition to create a new Bernwood SSSI as this would limit the scope of habitat creation.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has fully considered the proposals to create a larger Bernwood SSSI and assessed all of the potential cited interest features of the proposed SSSI in their own right. In its **Relevant Representation [RR-203]** Natural England has confirmed this: "*The Environmental Statement has fully considered impacts to the existing SSSIs as well as the proposed Bernwood SSSI as best it can, given the status of the proposed designation, which we welcome. The importance of the Bechstein's bat population, their sensitivity, and the potential impacts from the project have been appropriately characterized.* *Potential direct and indirect impacts to the interest features of the SSSIs have been appropriately assessed. Natural England agree with the conclusion that there are no residual impacts (after mitigation) on SSSIs.*"

RR-049	BOA	Comment that the western part of the Order Limits is identified in the Milton Keynes and Buckinghamshire Local Recovery Strategy as 'land which could become important for biodiversity', with inclusion of this land within a Biodiversity Opportunity Area, which the Proposed Development would prevent or restrict by limiting scope for targeted habitat creation.	The Applicant is aware that the Proposed Development is located within the Bernwood BOA and which is vast, covering 5870 ha. Consultation has been undertaken with BBOWT and relevant consultees relating to these designations to discuss potential effects on the ecological network. It is not considered that, with the proposed mitigation measures outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]**, the Proposed Development would significantly jeopardise the aims of the BOA. In fact, following construction habitats within the Order Limits would meet a number of the BOA aims; namely: • Proposed enhancement and creation of ponds within the BOA • Proposed and enhanced hedgerows within the BOA.
RR-049	Habitat creation	Comment that the biodiversity improvements delivered as part of the Proposed Development would improve habitats for some species at the expense of others, such as breeding skylark and wintering waders.	The Applicant notes this comment. The Applicant has fully assessed and considered potential effects of the Proposed Development on biodiversity in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Proposed mitigation measures are also detailed in the above chapter, which would be secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**
RR-049	Impact on birds	Comment that the Proposed Development would displace several bird species including snipe, lapwing, golden plover and raptors.	Mitigation for both breeding and wintering bird species is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and detailed and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. The mitigation proposed to address potential displacement

			impacts as a result of the Proposed Development is robust and sufficient.
RR-049	Impact on protected species	Comment that the Applicant is concerned about potential effects on protected species including great crested newt, badger and otter.	The full assessment for legally protected species is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and, where required, mitigation measures are detailed and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.
RR-049	Historic landscape character	Comment that the fundamental change in landscape character from agricultural to industrial would have a significant effect on the legibility and coherence of the historic landscape.	The Historic Landscape Character of the Order Limits is one of enclosed fields originating before the 18th century. With the exception of short sections of hedgerow removal to accommodate the internal access, and potential removal of a hedgerow to accommodate the BESS within Fields D8 and D9, the pattern of fields would not be altered by the Proposed Development and would remain legible as a landscape of post-medieval enclosure. The effect of the change of land use from agriculture to a solar farm has been acknowledged within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** where it relates to the significance of heritage assets. The **Design Approach Document [EN010158/APP/5.8] [APP-038]** sets out how the Proposed Development has responded to the character of the landscape, including through Project Principle 6.1 - Ensure proposals fit with the natural environment and draw from existing characteristics, informed by relevant local studies such as the Aylesbury Vale Landscape Character Assessment, Project Principle 6.3 -

Respect the historic pattern of the landscape and setting of cultural sites, including Claydon House and individual Listed Buildings, responding to the distinctive character of the local environment, Project Principle 6.4 - Conserve and where possible enhance designed landscape features such as Home Wood and Knowl Hill, including ensuring that the 'designed' appearance of woodlands such as Shrubs Wood is retained, and Project Principle 6.5 - Retain existing vegetation wherever reasonably possible to maintain the fabric of the Site and aid assimilation of development into its context.

In addition, the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** and **Outline LEMP [EN010158/APP/7.6] [APP-142]** secure the retention of woodland and hedgerows within the Order Limits as part of the underlying character of the landscape.

Further assessment of the effect of the Proposed Development on the local landscape is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. It should be noted that the degree of visual change to the landscape is not directly comparable to the level of harm (magnitude of impact) to heritage significance as heritage assets derive significance from their historic fabric as well as from their setting.

It is acknowledged that the character and appearance of the landscape would change from arable farmland to a utility-scale Solar PV development. However, the Applicant does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development. The extent of

			manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present, but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as overhead powerlines and occasional utilitarian agricultural buildings.
RR-049	Impact on heritage assets	Comment that there are a number of designated and non-designated heritage assets which would be affected by the Proposed Development, with specific reference to the setting of Claydon House, associated buildings and the RPG, Pond Farmhouse and Bernwood Farm.	Impacts to Claydon House listed building, its associated buildings and Registered Park and Garden and Pond Farmhouse have been considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** and supporting **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**. The assessment concluded that the harm to the significance of Claydon House and its associated buildings and Registered Park and Garden and to Pond Farmhouse would be less than substantial harm. It further concluded that the level of less than substantial harm to Claydon House, Claydon Registered Park and Garden and associated heritage assets within the park would be at the lower end and would not equate to significant effects. It found that the harm to Pond Farmhouse would be greater (though still less than substantial) and that this would result in a significant effect. The list of assets scoped into the assessment was agreed with Historic England and Buckinghamshire Council's built heritage advisor. Bernwood Farm is not a designated heritage asset and is not identified as a non-designated heritage asset by the Buckinghamshire Historic Environment

			Record. It is shown on the 1st edition Ordnance Survey (illustrated in **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**) and as such it could be considered a non-designated heritage asset. According to the assessment methodology, significant effects to non-designated heritage assets can only result from high levels of harm to significance (impacts of major magnitude), this would not occur to Bernwood Farm and as such it is not considered necessary to include it in the assessment.
RR-049	Claydon House	Comment that wider appreciation of the setting of Claydon House and RPG from the PRoW network should be considered.	The Applicant has considered the contribution that views of Claydon House and Claydon Registered Park and Garden from the surrounding PRoWs make to their significance within the detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**). The assessment concludes that there would be less than substantial harm to these assets, and Historic England concurs with this assessment as noted in its **Relevant Representation [RR-109]**.
RR-049	Archaeology	Comment that parts of the Order Limits have high archaeological potential and any features and deposits would be put at risk from the construction of the Proposed Development.	The Applicant has assessed the archaeological potential of the Order Limits through geophysical survey (**ES Volume 4, Appendix 9.2: Geophysical Survey Report [EN010158/APP/6.4] [AP-107]**) and targeted trial trenching **(ES Volume 4, Appendix 9.3: Archaeological Trial Trenching Report [EN010158/APP/6.4] [APP-108]**). These have identified an area of Romano-British settlement in Parcel 3 which would be impacted by the proposed Rosefield Substation and BESS and for which a programme of post-

			consent archaeological mitigation has been agreed with Buckinghamshire Council. The geophysical survey has also identified further areas of archaeological potential and a programme of post-consent evaluation and archaeological mitigation for these and other currently unknown archaeological remains (to be secured by a DCO Requirement) is detailed within the **Draft Archaeology Management Strategy [EN010158/APP/7.10] [APP-146].**
RR-049	Conservation areas	Comment that the contextual and visual relationship of conservation areas close to or immediately adjacent to the Order Limits would be severely harmed.	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** and supporting **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]** set out the Applicant's conclusion that the harm to the significance of the Botolph Claydon and Middle Claydon Conservation Areas would be less than substantial. Historic England concurs with this assessment as detailed in its **Relevant Representation [RR-109]**.
RR-049	Approach to assessment	Comment that the LVIA underestimates levels of landscape sensitivity due to a lack of granular baseline study and analysis.	The Applicant respectfully disagrees with the comment and maintains that a detailed review of sensitivity, informed by susceptibility and value tables, is provided for each relevant landscape character area as set out in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. This fine-grained study of landscape sensitivity follows the principles set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, and the Technical Guidance Note 02-21 - Assessing Landscape Value Outside National Designations, both published by the Landscape Institute.

RR-049	Approach to assessment	Comment that sensitivity levels vary across the study area but parts of the Order Limits and surrounding landscapes are of higher sensitivity than those in the wider landscape beyond the study area.	**ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** has been provided by the Applicant. The extent of this study was made in agreement with Landscape Officers from Buckinghamshire Council and is considered to include all relevant landscape receptors.
RR-049	Site selection	Comment that a landscape-led approach to site selection has not been adopted for the Proposed Development as there are a large number of highly sensitive landscape receptors within the study area which would directly and indirectly experience unacceptably high levels of adverse effects due to the scale, nature and long-term duration of the Proposed Development which should have resulted in the exclusion of the site from consideration.	As set out in the **Site Selection Report (Appendix 1** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**), landscape impacts was a key consideration when selecting a site, alongside a number of other site selection criteria within NPS EN-3 (2024). As presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**, the Applicant acknowledges that there would be likely significant effects on landscape receptors LCA 5.7: Hogshaw Claylands; LCA 7.3: Claydon Bowl; and LCA 9.1: Finemere Hill. These significant effects would occur as a result of introducing a utility-scale Solar PV into an agricultural landscape. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present, but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings.

			The Applicant therefore maintains that this type of direct landscape effect is typical of the introduction of a utility-scale Solar PV into an agricultural landscape.
RR-049	Approach to assessment	Comment that errors in the method and approach of the LVIA have led to levels of adverse landscape and visual effects being underestimated, including: • A lack of identification of important landscape and visual value and susceptibility factors • Conflating value and susceptibility criteria • Potentially flawed assumptions about levels of magnitude of change (for example in terms of direct / indirect effects, and degree of visibility)	The factors influencing landscape value and susceptibility are clearly identified in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112],** whilst those affecting visual sensitivity are set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. Criteria for value and susceptibility are clearly identified and separately assessed in the documents noted above. The Applicant respectfully disagrees with the comment regarding a potentially flawed assessment of magnitude, and maintains that the analysis as set out in **Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** follows best practice as set out in relevant guidance documents.
RR-049	Approach to assessment	Comment that there has been an inconsistent use of numbered point scales within the LVIA, with the threshold for 'significance' at Moderate – Major, with professional judgement applied to decide whether or not Moderate effects should be categorised as 'significant'. However, the LVIA	The Applicant respectfully disagrees with the comment regarding any inconsistency in judgement of significance of effects. The comment regarding 'numbered point scales' potentially introduces the concept of numerical weighting into the assessment which Landscape Institute guidance (GLVIA3) is clear should be avoided. The analysis as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** uses a word scale, as recommended in GLVIA3. In addition, as set out in the same

		uses a four-point scale for levels of magnitude, so Moderate is not in the middle, it is the second highest category. Therefore, using the Applicant's four-point scale, Moderate effects should automatically be categorised as 'significant', and professional judgement applied to determine whether a Moderate - Minor effect is significant or not.	guidance and in the Notes and Clarifications on Aspects of GLVIA3, it is not necessary to establish thresholds for levels of significance provided that it is clear whether effects are, or are not, significant. The methodology for the assessment is clearly set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** and the Applicant maintains that this approach is consistent with best practice guidance.
RR-049	Direct impacts	Comment that direct effects on the overall character of the Order Limits do not appear to have been reported, only effects on its 'fabric' which does not accord with GLVIA3. Evidently, the level of magnitude of direct effect on the site's character would be Large (the highest level on the LVIA's four-point scale), and the effects could not be mitigated. Therefore, according to the LVIA's criteria, even a Low sensitivity landscape receptor would experience a Moderate Adverse direct overall effect, which in theory should be 'significant' (see above).	The Applicant respectfully disagrees with the comment that direct effects on landscape character have not been assessed. In accordance with GLVIA3 the analysis set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** describes whether effects are direct or indirect and the extent to which any such effects would be significant. In addition, the Applicant disagrees that all effects assessed as Moderate Adverse 'should be significant'. As set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** where moderate effects are predicted, professional judgement is applied to determine whether the effect is significant or not, with justification provided in each case. It is reported that significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character

			Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill, all of which are directly affected; for LCA 5.7 and LCA 7.3 effects have been assessed as Moderate Adverse and Significant.
RR-049	Likely effects	Comment that the statement that by year 10 of operation, 'there is likely to be a moderate beneficial effect on existing landscape fabric, which is considered to be significant' double counts mitigation measures as enhancements.	Effects on landscape fabric and landscape character are assessed separately as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. Any beneficial effects of the proposed mitigation are considered only in the assessment of changes to landscape fabric and are not considered as any form of offset when considering effects on landscape character.
RR-049	Year 10	Comment on use of Year 10 within the LVIA assessment, including: • That typically assessments consider Year 15 to be the point where hedgerow screening is fully affected, with woodlands taking substantially longer, but the LVIA assumes that all screening planting would be fully effective by Year 10. • It is not clear whether the LVIA reports levels of effects at Year 10 as they would be in winter or in summer, with preference for	The Applicant has used a Year 10 establishment for mitigation measures based on the assumptions for plant growth as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. The LVIA reports a worst-case winter scenario for residual effects (Year 10) based on these growth levels which are illustrated by the visualisations presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] [APP-117] [APP-118]**. In this instance a Year 15 assessment has not been considered necessary for the following reasons: • Hedgerow heights greater than 3m would not further reduce residual effects;

		the worst-case scenario of winter Year 10 to be adopted.	• A further 5 years tree growth would not further reduce residual effects; • Early planting in strategic locations would provide additional time for restocking to replace potential plant failures. Early planting refers to planting that can take place following consent (if it is granted) and before construction as noted in the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. Early planting locations have been identified in strategic locations informed by survey work.
RR-049	Screening	Comment that there is reliance on planting to screen views and reduce significant adverse effects on landscape character and visual amenity during construction, operation, and decommissioning but does not appear to factor in the adverse effects of existing views being lost.	As set out in the **Design Approach Document [EN010158/APP/5.9] [APP-038]** the assessment includes evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors through new hedgerow and tree planting. The Applicant respectfully disagrees that these mitigation measures have been judged to reduce levels of landscape and visual effects without considering loss of views. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** there are no instances where mitigation measures are described as reducing effects on landscape receptors, primarily because these significant effects are judged as a result of direct changes to the host landscape. With regard to visual receptors, with the exception of users of the North Buckinghamshire Way and occupiers of four residential properties, there are no instances where effects are judged to reduce below significant as a result of the screening effect of mitigation planting. For all other visual

			receptors, although it is acknowledged that mitigation planting may soften the effects of the Proposed Development, loss of views is also noted and no significant reduction in effects has been reported (Para. 10.10.616.)
RR-049	Screening	Comment that it is assumed the future baseline would be the same as the current baseline but it is extremely unlikely that the same vegetation would continue to screen the same views for the duration of the operational phase, and request for the worst-case scenario to be assumed, or at least, the likely degree of permanence of the off-site screening vegetation upon which the LVIA relies should be assessed and factored into the studies.	As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** the future baseline is difficult to predict with any certainty and it has therefore been assumed that it would remain unaltered. Barring the wholesale removal of existing mature woodland and hedgerows from within the Order Limits, the general cycle of woodland and hedgerow management would not change the assessments within the LVIA.
RR-049	Non-visual experience aspects of character	Comment that it is assumed in the assessment that all indirect adverse effects on character can be avoided / reduced by screening views, but this does not avoid / reduce effects on the non-visual experiential aspects of character, therefore levels of indirect adverse	The methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** takes into account the visual extent over which the Proposed Development may be indirectly experienced within the landscape of the Order Limits. Whilst a continued perception of the Proposed Development may be retained outside of the visual envelope, it is not considered that this could be readily quantified in terms of its contribution to the level of magnitude of effect.

		effects would be higher than reported.	Furthermore, it is not considered that any such effects would be sufficient to render currently non-significant effects as significant.
RR-049	Name of document	Comment that in the title of **ES Volume 4, Appendix 10.6: LVIA Visualisations RVAA Photomontages [EN010158/APP/6.4] [APP-117]** on the Examination Library differs from its name within the document (Volume 4 Appendix 10.6: LVIA Visualisations Photomontages) and request for confirmation whether the photomontages are illustrative of public views only, or whether some are representative of private views.	There are four sets of visualisations as set out in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] [APP-117] [APP-118]**. The first three illustrate the publicly available views and photomontages as referenced in the LVIA. The fourth illustrates the RVAA photography and includes both public and private views.
RR-049	Photomontages	Comment that only three viewpoints out of eleven that are subject to photomontages are on the periphery of the Order Limits, with none from PRoWs crossing the Order Limits, which does not represent a worst-case scenario. Request for additional photomontages from viewpoints along PRoWs crossing the site, at locations to be agreed through	The Applicant respectfully disagrees that the photomontages do not represent a worst-case scenario and that additional views are required. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** the locations for viewpoint photography and photomontages were agreed with Buckinghamshire Council Landscape Officers. Photomontages for Viewpoints 1, 9 and 18 illustrate views from the periphery of the Order Limits whilst two photomontages for Viewpoint 11 illustrate views from the Bernwood Jubilee Way within the Order Limits. In addition,

		consultation, especially with local residents.	visualisations 15, 19, 25 and 42 illustrate additional views to within the Order Limits.
RR-049	Glint and glare	Comment that the LVIA does not assess glint and glare effects, including that the photomontages do not show glint and glare effects.	The photomontage illustrated in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-117] follow best practice guidance as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110]. Potential glint and glare effects have been addressed in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** [APP-082].
RR-049	Glint and glare	Disagreement that the safety or amenity of people travelling along PRoWs within the Order Limits and study area isn't assessed within the **Glint and Glare Assessment (ES Volume 4, Appendix 5.4 [EN010158/APP/6.4]** [APP-082]).	Potential glint and glare effects on PRoW users have been addressed in Section 8.2 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4]** [APP-082]. In the absence of guidance on glint and glare effects on users of PROWs they have been considered in an overview assessment. Based on professional experience, there would be low or no impacts, with no significant adverse effects due to transient nature of the footpath users.
RR-049	Public Rights of Way	Comment that there a number of PRoWs which are well-used and valued in and around the Order Limits which would be impacted by being stopped up, diverted or for those that remain spoiled by views of the Proposed Development.	As set out in the **Outline RoWAS [EN010158/APP/7.8]** [APP-144], there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. Feedback in relation to PRoW was taken on board at all stages of the design of the Proposed Development, which informed offsets between the PRoW and Solar PV, such as along the Bernwood Jubilee Way and the Midshires/North Buckinghamshire Way. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the

inclusion of three new permissive footpaths within the Site. The new permissive footpaths would be as follows:

- A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane;
- A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and
- A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way.

The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning.

During the 30-month construction phase, existing PRoWs and Permissive Paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion would be for a maximum period of 6 months.

During the construction phase, five PRoWs would be permanently stopped up. However, in all cases permanent diversions would be provided, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**. These

			diversions would either rationalise existing routes or result in relatively minor increases in the length of routes to allow them to follow field edges and be located within buffers around the edges of the Proposed Development.
RR-049	Soils	Comment that there are reservations about the way ALC surveys have been carried out and agricultural land quality may have been understated. Specific comment that the surveys have not considered impacts on the existing land drainage.	The Applicant has followed MAFF (1988) (now Defra 2025) ALC guidance, with the methodology and results agreed with Natural England. Land drainage is not a limiting factor that influences ALC grade. Wetness and droughtiness of the soil profile have been assessed at each auger in line with the ALC guidance, therefore agricultural land quality has not been understated.
RR-049	Soils and flood risk	Comment that existing land drainage systems would be damaged by piling and wider construction activity which could impact on hydrology and flood risk, as well as soil quality.	Any land drainage systems damaged as part of the development (through piling or other construction methods) would either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. Damaged land drains would be restored as stated in paragraphs 5.4.8 of the **Outline SMP [EN010158/APP/7.3] [APP-143].** Therefore, any impacts to hydrology, flood risk and soil quality would be temporary and reversed.
RR-049	Noise and vibration	Comment that elements of the Proposed Development would introduce sources of significant noise and vibration into a tranquil area, and there has been no assessment of the cumulative impacts of noise and vibration	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented in

		sources from other developments in the Environmental Statement.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2 [APP-060]**. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures.
RR-049	Highways	Comment that there has been significant disruption in the local area due to major infrastructure projects including HS2, EWR and Greatmoor EfW including traffic, road closures, diversions and damage to the local road network and this would be exacerbated by the Proposed Development.	The Applicant has fully assessed the potential impacts of the Proposed Development on the local road network during the construction phase. Full details are provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. Following the implementation of mitigation measures detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**, the magnitude of impact to all receptors has been classified as minor and restricted to the short term of the construction phase only. No residual effects are anticipated, and the local road network is considered suitable for HGV traffic. Further, the assessment takes into account committed development traffic flows including both LGV and HGV committed traffic, (noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**), with no significant cumulative effects predicted as a result of this transport assessment.
RR-049	Safety at junctions	Comment that the proposed transport routes include junctions with poor visibility, with specific reference to Claydon Road / Quainton Road junction, and Claydon Road / Granborough	The Applicant has appropriately and robustly considered the safety of all road users and suitability of the local road network in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. Where junction improvements are proposed, these are detailed within **Outline CTMP [EN010158/APP/7.5] [APP-**

		Road where this is a proposed site access.	141]. No site access junction is proposed at the junction of Claydon Road / Granborough Road.
RR-049	AILs	Comment that the proposed AILs routing would involve major disruption to Winslow residents and traffic flows, especially in combination with other proposed energy developments in the area.	The proposed AIL route is part of the National Highways approved AIL route network. Approximately seven inbound AIL movements would be required during the construction phase of the Proposed Development. The Applicant would manage any delivery of AIL in line with its commitments as set out in Section 5 of the **Outline CTMP [EN010158/APP/7.5]** [APP-141]. This includes the use of civilian and police escorts and publication of planned AIL movements to residents and media outlets. Given the low number of predicted AIL movements, no cumulative effects on Winslow residents are expected in relation to transport and access
RR-049	Impact on local businesses	Comment that the Proposed Development could have negative impacts on the local economy with specific reference to impacts on local businesses TCS Biosciences Ltd, Claydon House and RPG and Hogshaw Farm and Wildlife Park due to loss of land and/or impacts on attractiveness of the attraction.	The Applicant has assessed effects on the local economy related to loss of land occupied by businesses, and changes in environment and access, within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** [APP-057]. Specific businesses mentioned in the comment are discussed in turn below. **TCS Biosciences** It is noted that commercial arrangements (including land swaps and financial compensation) have been agreed in principle with the majority of affected agricultural landowners and tenants, as detailed at paragraphs 14.8.24-14.8.27 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**

[APP-057]. In all cases heads of terms have been agreed, and in some cases the relevant agreements have been finalised. Where final agreement has not yet been reached, the Applicant is committed to ongoing engagement with affected parties to seek to reach agreement at the earliest opportunity.

This addresses the potential for impacts on landholdings in terms of the amount and quality of land (through replacement of at least the same level of provision), and in terms of severance of wider landholdings (where all replacement land is equally accessible from remaining landholdings and agricultural facilities).

In developing the Proposed Development, the Applicant has taken feedback from concerned non-agricultural businesses, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. In order to limit disruption to land used by TCS Biosciences, based on this organisation's feedback the Applicant has:

- Removed the option for the Rosefield Substation to be located in Field E23 (now proposed for Solar PV only), thereby reducing perceived operational noise effects; and
- Confirmed in the **Design Approach Document [EN010158/APP/5.8] [APP-038] t**hat at the detailed design stage, the Solar PV module arrangement for Field E23 would be designed to incorporate movement corridors

for TCS Biosciences sheep and/or horses to cross the field to access their other adjacent grazing fields.

Hogshaw Farm and Wildlife Park:

Hogshaw Farm and Wildlife Park is a visitor attraction located approximately 250m east of the Order Limits. The park is open to the public throughout the day from 10am to 5:30pm (excluding Mondays and Tuesdays) and is also used for children's birthday parties and school groups, after school activities, as well as housing an on-site café and shop.

An assessment of the potential for change to access and environmental amenity has been undertaken where there may be the potential to affect the viability of businesses as a result of significant changes.

These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity at Hogshaw Farm and Wildlife Park. Mitigation has been applied to reduce the significance of these effects as far as reasonably practicable, and it is not considered that this would affect the viability of the businesses concerned given their diverse attraction and business model.

During the pre-application period, consultation feedback has been considered, resulting in design changes and embedded mitigation being proposed to seek to limit adverse effects. In the case of Hogshaw Farm and Wildlife Park, a substantial woodland tree buffer is proposed to the eastern boundary of Fields D8, D9, D19 and D26.

			Claydon House/Park: Claydon House (an 18th Century country house) is a National Trust property and visitor attraction located north of the Order Limits. There are a number of supporting businesses adjacent to Claydon House, within the Claydon Estate, that offer refreshments and leisure opportunities to visitors. The venue is managed by the National Trust and open to the public to visit the house and gardens and is host to events such as the annual Towersey Festival. An assessment of the potential for change to access and environmental amenity has been undertaken where there may be the potential to affect the viability of businesses as a result of significant changes. These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity during the operational (including maintenance) phase. However, it is noted that for Claydon House, effects related to cultural heritage drawing on visual effects on setting and amenity are reported as slight adverse (not significant) in terms of operation (including maintenance) activity in the setting of Claydon House and Claydon Grade II Registered Park and Garden.
RR-049	BESS Safety	Comment that the proposed BESS and other BESS proposed in the local area pose a risk to public	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage

safety and wildlife due to fire risk. Specific concerns include emissions of toxic and flammable gases, run-off of contaminated firewater, public evacuation.	System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9]** [APP-145]. The Applicant has had ongoing dialogue with statutory consultees such as the UK Health Security Agency and Buckinghamshire and Milton Keynes Fire Authority (BMKFA). This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2]** [AS-009]) to ensure safe access and egress for any emergency services that may need to respond to an event. Final BESS design and site layout would be validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any BMKFA intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. BMKFA intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy would

be finalised with BMKFA and be clearly communicated in the Emergency Response Plan:

- To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and
- To ensure that firewater runoff is contained and tested before release or, if necessary, removed by tanker and treated offsite.

The Applicant has also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to nearby human health receptors, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm).

A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13]** [APP-149] has demonstrated that the risk to the population remains very low.

The overriding approach to manage issues around firefighting water is to avoid the risks. This is through identification and assessment of the risks and consequences, followed by tailoring the mitigation to capture, contain, test and

			appropriately dispose of any surface water runoff and fully aligning to UK regulations for firefighting water runoff. This therefore stops a pathway linking the potential source of contamination and receptor. Along with the **Outline BSMP [EN010158/APP/7.9]** [APP-145], the **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147] sets out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with BMKFA, setting out how they would respond to any BESS event. As set out in Section 5.5.2 of the **Outline BSMP [EN010158/APP/7.9]** [APP-145]: *In line with NFCC Guidance areas within 10m of BESS enclosures will not contain combustible vegetation and will not be planted with any new combustible vegetation wherever possible. Design of the Proposed Development would comply with NFCC guidance by specifying that areas within 10m of BESS equipment would be finished with gravel or other non-combustible surfacing. Any other vegetation on site would be kept in a condition such that they do not increase the risk of fire on site.*
RR-049	Capacity	Comment that the generation and storage capacity of infrastructure has not been provided and	The **Statement of Need [EN010158/APP/5.6]** [APP-036] sets out the compelling case for the urgent and continuing development of an unprecedented capacity of new

	therefore it is not possible to ascertain the degree of overplanting and whether the proposals represent a genuine worst-case scenario. Request for the Applicant to: • Justify any overplanting and explain whether the same export capacity could be delivered using less land with consequently reduced environmental impacts. • State what the BESS storage capacity would be as it may be possible to deliver the same export capacity with a smaller number of batteries and so reduced impacts.	low-carbon generation schemes. It also explains that access to the UK's electricity network is limited, and therefore that using the available and currently underutilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system. In this regard, the Applicant has sought to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target. As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**, the Applicant has a Phase 2 grid connection agreement with NESO to import and export 500MW (AC) of clean power, which the Applicant has requested to be reduced to 335MW (AC). NESO has indicated that it is their current plan to update the connection agreement to reflect this revised capacity by Q3 2026. A Rochdale Envelope approach to the DCO Application process has been taken to assess the impacts of the Proposed Development. Each environmental factor presented in the ES has assessed a worst case scenario based on the parameters set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** as detailed in Section 6 (Approach to the Assessment) of each environmental factor chapter of the **ES** (**Volume 2, Chapters 6 – 16**). Further detail on the approach to the assessment is detailed in Section 5.7 of **ES Volume 1,**

			Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048]. It is important to note that the exact design details of the Proposed Development cannot be confirmed at this stage. This is to allow for flexibility to accommodate changes in technological advancements. For example, enclosures and/or building sizes may vary depending on the contractor selected, their specific configuration, and plant selection. This is of particular importance to maintaining flexibility due to the rapid pace of change in Solar PV and energy storage technologies, as technology could be adopted at the detailed design stage that does not currently exist. The application allows for adaptability to ensure the most efficient technology can be adopted at a later date. However, the design parameters in the DCO Application would not deliver an overplanted scheme based on the current grid connection capacity. Any overplanting achieved against the proposed grid connection capacity would be unlikely to be significant. The BESS storage capacity would be proportionate in relation to the solar generation capacity and would be informed by the Proposed Development's grid connection capacity.
RR-049	Connection agreement	Comment that the grid connection is dependent upon the National Grid East Claydon Replacement Substation which has been delayed and therefore it is not clear that the Proposed Development could be delivered in	The Government's Clean Power 2030 Action Plan establishes challenging capacity ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The Government's capacity ranges for large-scale solar schemes are currently 45-47GW by 2030 and 45-69GW by 2035.

time to contribute to the government's 2030 targets.

However, the need for new schemes will continue beyond 2035, not only to ensure that electricity demand is met from low carbon supplies, but also so that sufficient electricity is produced in Great Britain to power a growing number of electric vehicles thereby enabling petrol cars to be taken off our roads, to power homes so gas boilers and cookers can be removed, and also so that other fossil fuels can be removed as an energy source for industrial and commercial processes.

The Applicant has received confirmation that it has been included within the re-prioritised connections queue. The Proposed Development is therefore needed to contribute to meeting the current capacity ranges.

The Government is "expecting an increase in planning applications with the Clean Power 2030 target" (CP2030, p55) and the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure, that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals".*

Therefore, even if the Proposed Development is not delivered before 2030, it would still be needed to support the delivery of the Government's aims.

The Applicant has secured a grid connection agreement as set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**. The current grid connection date is 31 October 2031. The Applicant has received confirmation that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2

			connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive) The Applicant continues to work closely and collaboratively with National Grid to deliver the Proposed Development to meet the prevailing grid connection date.
RR-049	RVAA	Comment that the RVAA relies on either existing vegetation and garden structures to avoid or understate harms without certainty that these would be in place for the duration of the Proposed Development (e.g. due to removal, loss to pest, disease, climate change) or on proposed new planting which would cut off views to open countryside and could render properties unattractive places to live. Comment that the Landscape Institute's Technical Guidance Note on Residential Visual Amenity (TGN 2/19) (which is currently being reviewed) does not state that the RVAA threshold only applies to residual effects, i.e. once proposed screening measures are assumed to have	As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** the future baseline is difficult to predict with any certainty and it has therefore been assumed that it would remain unaltered. Barring the wholesale removal of existing mature woodland and hedgerows (outwith the Applicant's control) from within the Order Limits, the general cycle of woodland and hedgerow management would not change the assessments within the RVAA. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** only the occupiers of 4-7 Catherine Cottages would experience effects reducing below significant as a result of the screening effect of mitigation planting. However, occupiers of these properties would not be cut off from views to open countryside and the Applicant disagrees that mitigation measures '*could render properties unattractive places to live*.' The methodology for the RVAA is provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. As per TGN 2/19 best practice guidance, the RVAA initially considers the change in visual amenity as the result of the addition of the Proposed Development to the existing baseline landscape. As per TGN

		become effective, which is the approach adopted.	2/19, it then considers the residual effects following proposed mitigation. These effects are then considered in the round when judging whether the RVAA threshold has been reached. The Applicant therefore respectfully disagrees that best practice guidance has not been followed.
RR-049	RVAA	Comment that TGN 2/19 does not make reference to heritage assets, although it is a matter of public interest that the value and amenity of these buildings is preserved to ensure that they are maintained for the benefit of future generations.	The impacts to the significance of the designated and non-designated heritage assets within the Order Limits have been considered within **ES Chapter 9: Cultural Heritage [EN010158/APP/6.2] [APP-052]** with supporting detailed assessments in **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4] [APP-106]**.
RR-049	RVAA	Comment that TGN 2/19 address only visual impacts on residential properties in the public interest but other effects, including noise, light, disturbance and glint and glare, can all contribute to the loss of amenity value for properties in proximity to the Proposed Development and this should be assessed.	Noise effects are considered within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**, whilst potential glint and glare effects have been addressed with regards to dwellings in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]**. No significant residual effects are identified in either assessment. Lighting information is provided in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** with lighting used only on an ad-hoc basis for health and safety or emergency purposes during operation (including maintenance). During consultation with Buckinghamshire Council, it was agreed that any such lighting effects during operation (including maintenance) would not be significant and could be scoped out. The effects of temporary lighting during construction are included in **ES**

			Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]. As reported in the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** no additional significant effects have been assessed as a result of the intra-project combined effects assessment.
RR-049	RVAA	Comment that the Proposed Development would give rise to a significant collective loss of amenity for a large number of dwellings, such that the experience of living in the area would be significantly devalued.	A detailed assessment of visual effects on residential receptors/settlements is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and in the RVAA provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. With regard to visual receptors within settlements, none have been assessed as experiencing significant adverse effects. With regard to individual properties, the residents of 4-7 Catherine Cottages, Bernwood Farm and Sion Hill Farm would experience significant visual effects during Year 1. By Year 10, residual effects would not be significant for residents of 4-7 Catherine Cottages, hence only two individual properties would experience long-term significant effects on account of the Proposed Development. No such effects have been judged as reaching the Residential Visual Amenity Threshold.
RR-049	Alternatives	Comment that there is no evidence that any other site was considered despite the application of a wide search area and the driving consideration appears to have	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) presents the reasoning why the Proposed Development is located in the Site's particular location. As set out in Section 4.2 of the Report, a viable grid connection is an essential material consideration for proceeding with a development and is

		been the ease of dealing with a single large landowner.	instrumental in defining the Search Area. The Search Area was based on the availability of a suitable grid connection at the National Grid East Claydon Substation, with sufficient capacity available to support a solar scheme of a viable size. A site closer to the substation was preferred on the basis that a shorter cable route has benefits in terms of ease and timeliness of the delivery of key infrastructure, minimising disruption to residents and businesses along the route, and minimising environmental disturbance and cost. Minimising the number of landowners is beneficial for a number of reasons, including; simplifying land negotiations, reducing the risk of project failure due to added complexity of multiple landowners, reducing the number of affected parties, and reducing reliance on compulsory acquisition, in accordance with policy requirements.

Table 2-25: CPRE Bucks

Reference number	Theme	Matter raised	Response
RR-054	Principle of development	Comment that CPRE fully recognises that solar energy has a part to play in fighting the climate crisis. However, ground-based solar farms require careful positioning in order to avoid adverse impacts on the countryside. Potential impacts of this development may include the	As detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**), the location and design of the Proposed Development is the result of a comprehensive site selection process that was environmentally, technically and planning-led to avoid and minimise the potential impacts of the Proposed Development. Following this, the Proposed Development has undergone an iterative design process, as outlined within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered**

		loss of productive agricultural land, blight caused by the scale and appearance of the farm and its associated infrastructure, and loss of biodiversity.	**[EN010158/APP/6.1] [APP-047]** which has resulted in the delivery of a functional and efficient Proposed Development design which will deliver a large amount of renewable and low carbon electricity using solar PV arrays. This delivery is achieved whilst ensuring the design remains sensitive to the local context and surrounding area within which the Proposed Development is located. The DCO Application has considered impacts on a range of factors, including those directly mentioned by CPRE; loss of production agricultural land (**ES Volume 2, Chapter 12: Soils [EN010158/APP/6.2] [APP-055]),** blight caused by the scale and appearance of the Proposed Development and its associated infrastructure (**ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**) and loss of biodiversity (**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**) and has sought to avoid and minimise impacts on the environment as far as practicable.

Table 2-26: Greg Smith MP

Reference number	Theme	Matter raised	Response
RR-100	Cumulative effects	Comment that the Proposed Development does not take into account cumulative effects of other large infrastructure projects in the local area, including: • Impacts on rural setting	The Applicant recognises there are concerns regarding the impact of the Proposed Development on the rural setting and has undertaken a detailed landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053]. It is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable

- Long-term traffic disruption from overlapping construction programmes
- Lack of benefits for local residents

farmland to a utility-scale solar PV development. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site and, notwithstanding some significant landscape and visual effects, the Applicant does not consider that these changes would result in the industrialising of the countryside.

The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms.

The assessment concludes that there are likely significant inter-project residual cumulative effects on landscape and visual and biodiversity following the implementation of embedded and additional mitigation measures.

Committed development traffic flows (including both LGV and HGV committed traffic) have been included in the impact assessment noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**.

No significant cumulative effects are predicted as a result of the Proposed Development.

Cumulative labour market effects are considered within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** from paragraph 17.7.46, concluding that given the scale of the labour market, the characteristics of the construction labour market, the cumulative employment supported (around 2.5% of existing resident construction workers in the CLMA Focus Area today) is likely to result in a low magnitude effect on a medium sensitivity receptor resulting in a temporary, minor beneficial effect (not significant).

The Applicant intends to provide benefits for the community through the enhancement of PRoWs and permissive paths, a Community Fund and creating direct and indirect beneficial effects associated with employment, skills and education.

The Applicant intends to promote economic benefits for the community through the activities set out in the **Outline ESSCP [EN010158/APP/7.14] [APP-150]**. The plan describes activities that would promote access to employment, upskilling and re-skilling opportunities for local people. These could include work experience placements, access to jobs, and joint Apprenticeships across industry partners.

The above Plan also includes provision for working with schools to promote career opportunities available to young

			people within renewable industries, including those available local to their place or residence. The Applicant is proposing to enhance the existing PRoW network and provide three new permissive paths to improve connectivity within the area and around the Order Limits. These are secured by the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.2] [AS-007]**. In addition, the Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The total amount of funding would be based on the final installed capacity of the Proposed Development. The Community Fund would be index linked from the first payment, with the RPI base rate linked to the operation date of the Proposed Development and reviewed annually.
RR-100	Impact on local economy	Comments about the impact of the Proposed Development on local farmers and the local economy, including: • The importance of agriculture for Buckinghamshire's economy.	The importance of the agricultural economy in Buckinghamshire is acknowledged in terms of its consideration by local and national policy, and in terms of its contribution to employment and economic output. This forms part of the socio-economic baseline set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**.

	• That the livelihoods of local farmers and agricultural-focused firms would be threatened. • Loss of farming activity would impact the local economy through potential loss of revenue and unemployment. • That a vast proportion of land would be subject to compulsory purchase orders which is affecting tenants and landowners.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** provides an assessment of the effects on the regional agricultural economy, and the individual landholdings, tenants and businesses affected directly (in terms of land-take) and indirectly (in terms of access or environmental change) by the Proposed Development. The assessment concludes that there would be no significant adverse effects, summarising that: In terms of the agricultural economy as a whole: • Overall, the temporary land-take at the Site during the 30-month construction phase would result in up to 677ha being taken out of agricultural use – equivalent to 0.65% of agricultural land in Buckinghamshire being taken out of agricultural use for the construction and operation (including maintenance) phases. • Within this, the short-term, temporary land-take at the Site during the 30- month construction phase would account for about 33% of the agricultural land, which would then be re-instated and be made available for agricultural activity during the operation (including maintenance) phase. • Indicatively, based on County-wide average employment per ha this would result in the temporary, long-term reduction of the indicative capacity for up to around 10 FTE jobs, and temporary, short-term reduction of the indicative capacity for up to around 5 FTE jobs (total agricultural employment in Buckinghamshire is estimated at approximately 2,237 FTE jobs).

- The agricultural economy in Buckinghamshire is substantial and subject to annual and seasonal variations in employment supported which is far greater than the scale of the indicative loss in employment capacity (and actual known employment).

In terms of effects on individual landholdings, tenants and businesses, commercial agreements (including land swap and financial compensation) described in paragraphs 14.8.24 to 14.8.27 would be in place. At the point of submission of the application, Heads of Terms have been agreed for land swaps and financial compensation with all tenants and landowners, and in some cases, agreements have been finalised.

This addresses the potential for impacts on landholdings in terms of the amount and quality of land (through replacement of at least the same level of provision), and in terms of severance of wider landholdings (where all replacement land is equally accessible from remaining landholdings and agricultural facilities; and for example, through the commitment to allow for an grazing animal corridor through Field E23 to prevent severance).

Engagement with the agricultural operators has confirmed that the actual employment supported by the agricultural land affected by construction activity is far lower than the indicative capacity referred to above, and therefore the above assessment sets a hypothetical, 'worst-case' assessment of employment capacity rather than actual net employment reduction which would be influenced by commercial

			agreements between the Applicant and agricultural operations affected.
RR-100	Principle of development	Comments against the principle of use of agricultural land for the Proposed Development due to impacts on UK food security, with requests for alternative scales of solar (rooftops) and methods of energy generation (SMRs) to be considered.	NPS EN-3 (2024) places emphasis on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. Importantly, however, it goes on to state that "land type should not be a predominating factor in determining the suitability of the site location". NPS EN-3 (2024) continues to acknowledge that solar development is not prohibited on BMV land, land recognised for its natural beauty or ecological or archaeological importance and that it is recognised that, at scale, developments may use some agricultural land. However, applicants should explain site selection noting a preference for development on brownfield and non-agricultural land. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. Section 7.3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** notes that it would not be feasible to reach the

			Government's solar capacity ranges through only rooftop and small-scale schemes. Therefore, large-scale solar schemes are also required in order to achieve Net Zero. It also notes that NPS EN-1 (2024) demonstrates the Government's view that rooftop and small-scale schemes are needed alongside, but not instead of, large-scale ground mount solar schemes; such as the Proposed Development. This is because the bulk generation potential of large-scale schemes and their connection to the National Electricity Transmission System enables their benefits to be felt more widely.
RR-100	Impact on farm animals	Comment that vast amounts of livestock would be displaced, with those that remain living close to Proposed Development which would constitute a safety risk to the animals and the structures. Specific example given is the potential of livestock being spooked in low-light conditions, the resulting panic could cause severe injury to the animals and damage to the solar panels, as well as fences, gates and other property - with the subsequent risk to road users should they reach the highway.	Paragraph 1.3.1 of **ES, Volume 4: Appendix 12.1 Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]** notes that the Site is predominantly arable cereal crop rotation therefore there would not be a vast amount of livestock displaced. It is important to note that the proposed Solar PV modules would be bifacial with an anti-glare coating as secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**, to reduce light polarisation impacts, and therefore the potential to spook livestock in low light conditions. In addition, individual fields where Solar PV panels are proposed would be broken up significantly by retained woodland and hedgerows and the associated buffers, which are likely to screen the panels from livestock. Finally, the solar panels would be securely fenced reducing potential for livestock to escape. The fencing would be a

			better standard and higher than that of a normal farm therefore there is a reduced risk for livestock.
RR-100	Traffic and transport	Comments that the existing local road network cannot support the vehicles needed for the construction of the Proposed Development, including: • That there has not been an impact assessment of the road network from the construction of the Proposed Development. • That the local road network is comprised primarily of narrow unclassified roads which would not be able to cope with the proposed HGV movements per day. • That there are road safety issues for road users and pedestrians due to the condition of the roads and the number of HGV and LGVs on rural, unlit roads. • That where projects have overlapped there has not been effective communication to mitigate impacts on local residents and shorten timescales.	The Applicant has fully assessed the potential impacts of the Proposed Development on the local road network, including road safety. Full details are provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. The local road network is considered suitable for HGV traffic, and it is considered that road safety would not be adversely impacted by the Proposed Development for all road users. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** has been informed and shaped by consultation and engagement, drawing on experiences of other infrastructure projects in the local area to ensure that proposed measures are appropriate and efficient. This includes collaboration with other developments, with provision for the Principal Contractor to consult with the HS2 Transport Officer to coordinate haulage operations on the access routes during the construction period. To ensure integrity of the local road network, the **Outline CTMP [EN010158/APP/7.5] [APP-141]** also sets out the Applicant's proposed approach to the adoption of a Wear and Tear Agreement, which would be a legal agreement with the host authority. This would cover potential damage to the public road network within the proposed construction route, verges and structures as a result of the Proposed Development. It would be based upon condition surveys of the road.

		• That the local road network has been severely damaged by HGV traffic associated with construction of other developments in the area, and this would be exacerbated by the Proposed Development, or remedial work would be undone.	
RR-100	Damage to residential properties	Comment that residential properties in the area have been damaged by HGV movements from other developments and this would be exacerbated due as a direct result of excessive vibration.	Construction traffic has been routed to avoid existing villages and towns as far as possible, with the intention of minimising potential disturbance experienced by occupants of sensitive roadside receptors. Significant levels of vibration from vehicle movements can occur when defects in the road surface are present. Prior to the works commencing, a condition survey of the proposed roads used for construction traffic would be undertaken. Where defects in the road surface in the vicinity of residential properties may give rise to excessive vibration from HGV movements, this would be identified to Buckinghamshire Council so that appropriate remedial works could be undertaken to minimise significant adverse effects. The road condition would subsequently be subject to interim reviews and maintenance in line with the Wear and Tear agreement secured by the **Outline CTMP [EN010158/APP/7.5] [APP-141]**.
RR-100	Impact on tourism	Comment that there would be an impact on the local tourism economy as the attractiveness of The Claydons to visit would be diminished, including	Effects on tourism and the tourist economy have been assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**, which considers the potential for environmental change to cause significant

		visual impacts from the local footpath network and direct impacts on Hogshaw Farm which operates summer camps using land under threat by the Proposed Development with no readily available alternative.	adverse effects (prior to additional mitigation) to facilities and assets that contribute to the draw and experience of tourists in the local area, contributing to the value and volume of the wider tourist economy. This draws on effects reported across the ES, that may influence the tourist economy and its components including: • Visual effects, noise, vibration, air quality effects experienced by people; and • Where activities in the area could reduce accessibility or present physical obstructions to recreational and tourist facilities including accommodation, natural and cultural heritage, PRoW and tourist attractions. The assessment concludes that it is likely that some tourist sector receptors (e.g. local recreational attractions including Hogshaw Farm and Wildlife Park) would experience significant effects on visual amenity, but there would be no other significant environmental effects, and no change in land or access to land used by Hogshaw Farm and Wildlife Park. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited geographically (to six PRoW experiencing significant visual effects) and managed by embedded and additional mitigation as far as reasonably practicable.
RR-100	BESS safety	Comment that the BESS would industrialise the countryside and pose fundamental safety concerns due to fire risks, with resultant environmental	The Applicant recognises the concerns regarding landscape change but does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development. An assessment to determine the likely significant effects on

	harm leading to soil and water contamination as well as the discharge of toxic chemical fumes. Reference to report produced by the UK Health Security Agency for a BESS planning application 25/0491/FUL in North Kesteven which raises concerns about BESS safety, air quality, contamination risk, EMF, waste and noise.	landscape and visual amenity is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**, which reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. It is acknowledged that the character and appearance of the landscape within the Order Limits would therefore change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules, Satellite and Main Collector Compounds, BESS, Rosefield Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural use. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present, but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings. The relevant extracts from local landscape character studies (LCT/LCA), including the special qualities of the Quainton-Wing Hills Area of Attractive Landscape (as identified in '*Defining the special qualities of local landscape designations*

in the Aylesbury Vale District') are presented in **ES Volume 4, Appendix 10.2: Rosefield Extracts from Published LCA [EN010158/APP/6.4] [APP-111]**. As set out in the **Design Approach Document [EN010158/APP/5.9] [APP-038]** this information has been used to inform the approach to good design. The assessment includes evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors, through new hedgerow and tree planting and the sowing of wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site as secured in the **Outline LEMP [EN010158/APP/7.6] [APP-142].**

The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145].** This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-**

	009]) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant has ongoing dialogue with statutory consultees such as the UK Health Security Agency and Buckinghamshire and Milton Keynes Fire Authority. Draft statements of common ground have been provided with both consultees (**Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041] and Draft Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12] [APP-042]**) with regards to the Plume Study Requirements and BESS safety. The Applicant has also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, the offsite risks aren't significant, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low.

The overriding approach to manage issues around firefighting water is to avoid the risks. This is through identification and assessment of the risks and consequences, followed by tailoring the mitigation to capture, contain, test and appropriately dispose of any surface water runoff, fully aligning to UK regulations for firefighting water runoff. This therefore stops a pathway linking the potential source of contamination and receptor. The Environment Agency is a statutory consultee on the Proposed Development, and a Statement of Common Ground will be drafted to ensure that all pollution concerns are agreed for the Proposed Development.

Along with the **Outline BSMP [EN010158/APP/7.9] [APP-145]**, the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]** sets out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with BMKFA, setting out how they would respond to any BESS event.

The direct current energy that BESS systems generate does not produce EMF waves. The inverters and transformers connected to the BESS would be housed in metal structures to protect them from the elements. This also acts as shielding so they should not omit electrical fields. **ES Volume 4, Appendix 5.6: EMF Assessment (Electromagnetic Field Assessment) [EN010158/APP/6.4] [APP-084]** concludes

			that the EMF radiation from the Rosefield Substation and BESS would not be significant as they will be located at least 274m from any surrounding dwellings. For users of PRoWs, any effects are expected to be minimal due to their transient exposure.
RR-100	Need	Comment that there is a lack of capacity in the National Grid to connect new BESS developments, and at the eventual time of connection the necessity for BESS installations may be outdated, which calls into question the benefits of the Application.	The Government's Clean Power 2030 Action Plan establishes challenging capacity ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The Government's capacity ranges for batteries are currently 23-27GW by 2030 and 24-28GW by 2035. To mitigate against any risks which may materialise in the development of projects of all technologies needed to achieve Clean Power, the Government has retained a degree of optionality in its approach to achieving net zero (CP2030, p31). The capacity ranges are not fixed and therefore there is a need for schemes to continue to come forward even if the capacity ranges are met. The BESS component of the Proposed Development has secured a Gate 1 connection from NESO**.** This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030,

			p55). Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure[17] that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, it would not be correct to infer from the current policy position, current capacity ranges and NESO's prioritisation, that the need established by NPS EN-1 does not apply to any scheme or component of a scheme which currently has a Gate 1 connection agreement.
RR-100	Habitat	Comment that the local area is important for a number of species, including protected species of bats, newts, bats, red kites, foxes, deer and various birds of prey and these would be displaced and reduced due to loss of greenfield space, use of fencing and impacts of construction.	The importance of the location for legally protected and other species is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [**APP-050**] and, where appropriate, mitigation is detailed and secured by **Outline LEMP [EN010158/APP/7.6**] [**APP-142**]. The mitigation proposed to address the impacts of the Proposed Development is robust and sufficient to address the issue of potential displacement and ensure connectivity, enabling species to move across the landscape. It should be noted that all woodland habitat and the majority of hedgerows would be retained with large buffer offsets to enable continued foraging and movement of species. Large areas of the Proposed Development are set aside without Solar PV and would be managed for the benefit of biodiversity, and

[17] https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf

			likewise large parts of the Order Limits would be subject to short term temporary construction impacts (for example the cable route) and would be returned to agricultural use. Fencing would be on the inside of each field with sizeable buffers from hedgerows and woodland which would enable wildlife to move between fields across the wider landscape. In addition, fencing would not be buried so mammals such as hare and badger would be able to push underneath the fencing at low points to access fields to forage. Where appropriate, following pre construction surveys the Applicant has also committed through the **Outline LEMP [EN010158/APP/7.6]** [APP-142] to provide badger gates.
RR-100	Visual impact	Comment that the true extent of the visual impact of the Proposed Development has been overlooked by the project's promoters with dispute that the Proposed Development could be effectively screened due to the surrounding topography and taller proposed elements such as the BESS and associated equipment, lighting, CCTV and fencing.	The LVIA methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110] takes into account the visual extent over which the Proposed Development may be indirectly experienced to within the landscape of the Order Limits. The extent of this study was agreed with Landscape Officers from Buckinghamshire Council and is considered to include all relevant landscape receptors. As presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] the LVIA has considered the maximum parameters for each element of the Proposed Development as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2]** [AS-021] and **Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** [APP-063]. As set out in the **Design Approach Document [EN010158/APP/5.9]** [APP-038] the assessment includes

			evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors through new hedgerow and tree planting. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** there are no instances where mitigation measures are described as reducing effects on landscape receptors, primarily because these significant effects are judged as a result of direct changes to the host landscape. With regard to visual receptors, with the exception of users of the North Buckinghamshire Way and occupiers of four residential properties, there are no instances where effects are judged to reduce below significant as a result of the screening effect of mitigation planting. For all other visual receptors, although it is acknowledged that mitigation planting may soften the effects of the Proposed Development, loss of views is also noted and no significant reduction in effects has been reported (Para. 10.10.616.). The Applicant therefore disagrees that the extent of significant effects has been overlooked, or that mitigation planting could be used to screen all such effects.
RR-100	Procurement	Comment that there are ethical concerns about the procurement of solar panels, including the use of slave labour.	Section 3.5 Ethical Procurement, of the **Outline ESSCP [EN010158/APP/7.14] [APP-150]** sets out the key tenets of how ethical procurement would be ensured in relation to delivering the Proposed Development and how doing business in an ethical way is of utmost importance to the Applicant. The Applicant is committed to working to ensure sustainable, ethical practice across supply chains, and would not tolerate fraud, corruption or abuse of human rights.

The Applicant recognises that Modern Slavery and human trafficking are growing global concerns and consistently strives to ensure that its own operations, and those of the supply chains, are appropriately evaluating the risks of Modern Slavery and human trafficking.

The Applicant recognises the increased risk of Modern Slavery in the solar energy supply chain, particularly due to the complexities associated with the manufacture of solar PV panels. These risks are taken seriously, and a rigorous approach is applied to ensure that all supply chain partners align with the Applicant's values and legal obligations, including compliance with the Modern Slavery Act 2015.

There are three main aspects to the supply chain management framework:

- Modern Slavery risk evaluation in operations and supply chains
- Sustainable procurement and due diligence process
- Certification and Environmental and Social Governance audits for solar panel suppliers. This includes production site audits and ongoing monitoring, whereby suppliers are subject to ongoing regular review by the EDF Group's Corporate Audit Team.

The above measures would be secured through the Detailed Plan and carried through into the detailed design and delivery stages. These would be embedded into the procurement strategy and contractual frameworks to ensure enforceability.

RR-100	Future expansion	Comment that there is a lack of clarity over potential plans for any future expansion of the Proposed Development.	The DCO Application is for the construction, operation (including maintenance), and decommissioning of Solar PV development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation. The Applicant does not intend to materially alter the Proposed Development that is subject to the DCO Application.
RR-100	Compliance with local policy	Comment that the Proposed Development would contravene Buckinghamshire Council planning policies BE3, S3, NE4 and BE2.	Consideration of the Vale of Aylesbury Local Plan 2013 – 2033 is included within **Appendix 4: Policy Compliance Assessment Tables** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**, including direct consideration of policies BE3, S3, NE4 and BE2. The Policy Compliance Assessment Table does not conclude a contradiction/ non-compliance with these referenced planning policies.

Table 2-27: North Bucks Bat Group

Reference number	Theme	Matter raised	Response
RR-208	Bechstein's bat	Comment that North Bucks Bat Group register its objection to the Proposed Development due to the high probability of a negative impact on a nationally important colony of Bechstein's bat, which represents the most north-easterly	The full detailed assessment of the potential impacts of the Proposed Development on bats is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and

		extent of the species in the UK and is geographically and genetically isolated, making it vulnerable to disturbance and habitat loss.	enhancement of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches.
RR-208	Bechstein's bat	Comment that the site chosen for the Proposed Development is inappropriate as it includes the entire foraging area for the known population of Bechstein's bat.	The area proposed for Solar PV development equates to 2.75% of the core sustenance zone and 5.33% of the home range for Bechstein's bats as defined by Natural England. Core foraging habitat for Bechstein's bat is woodland (all of which would be retained), along with the hedgerow resource (the majority of which is being retained) and associated buffers. It should also be noted that large areas of the Order Limits (for example the cable route) would be returned to agriculture following the short-term impact of installing the cable and would still be available to foraging bats. The full suite of mitigation habitat creation and enhancement measures in relation for foraging bats is outlined in **Outline LEMP [EN010158/APP/7.6] [APP-142]**.
RR-208	Lake effect	Comment that there is evidence of a 'lake effect' which may affect bats resulting in collision or landing, or desertion of habitat.	The risk of the lake effect and other impacts concerned with light polarisation have been fully assessed within the ecological assessment in a number of locations (see paragraph 7.8.118 - 119, 7.8.137-138 and 7.8.152) of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. However, it is important to note that the proposed Solar PV modules would be bifacial with an anti-glare coating, to reduce light polarisation impacts as secured in Commitment D9 in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. In

addition, individual fields proposed for Solar PV panels would be 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.

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. While typical bat flight heights vary amongst the species within this grouping, the majority of bats would fly higher than the 3.5m height of the solar PV panels and are therefore unlikely to otherwise be at significant risk from collision[18] .

Barbastelle bats almost exclusively feed on moths[19] and while a small number of UK moths have an aquatic life stage, it is considered likely that moths may be less impacted by mistaking the surface of panels for waterbodies. As noted above, the use of coatings on Solar PV modules to minimise

[18] 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
[19] Diezt, C., and Keifer, A. (2016) Bats of Britain and Europe. Bloomsbury Publishing Plc. London

			the impacts of light polarisation is likely to further limit any potential impacts on the bat prey resource by insects mistaking panel surfaces for waterbodies. The trawling foraging behaviour of Daubenton's bat may place it at greater risk of impact due to light polarisation from the Solar PV modules, both in relation to increased collision risks from attempting to forage over Solar PV modules and potential changes in prey distribution and/or abundance. However, it should be noted that there are no notable sizeable waterbodies present within the Site or in the 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.
RR-208	Noise	Comment that **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** states that there could be an impact on bats due to operational noise from the BESS and potentially solar PV modules.	Until recently, most measurements of noise were undertaken to determine impacts on human receptors rather than bats. Such measurements are typically 'weighted' to reflect the relative loudness of sounds as perceived by the human ear rather than unweighted noise levels. 'A-weighted' data (represented as dBA) emphasise sounds inaudible to bats whilst under-representing those audible to bats. However, there is increasing awareness of the need to use unweighted measurements and examples of such unweighted data are now available within the Bat Mitigation Guidelines (Reason & Wray, 2025). These guidelines also provide a template for noise assessments. At Deadline 1, the Applicant will submit an assessment of the risk of disturbance from construction noise generated by elements of the Proposed Development in a Technical Note.

			This also summarises a high-frequency unweighted noise study carried out at an operational solar farm (using a template which has been accepted by Natural England in other licence applications). In summary, neither construction nor operation are considered to represent a significant source of noise disturbance (however, some pre-construction assessments may be required depending on haul route layout and programme). For the most part, as disturbance is unlikely, even for the low threshold of disturbance for offences which derive from domestic legislation, a licence is unlikely to be required. In the absence of a licence, a Precautionary Working Method Statement would be produced and is secured via the **Outline CEMP [EN010158/APP/7.2] [APP-138].**
RR-208	Lighting	Comment that the Proposed Development would require artificial lighting during the hours of darkness when bats are foraging, and this may affect emergence for light adverse woodland bats such as Bechstein's as well as changes in lifecycles of its prey.	There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** and **Outline CEMP [EN010158/APP/7.2] [APP-138]**.

RR-208	Habitat loss	Comment that potential habitat loss includes drainage of wetlands, woodland clearance, and the increased use of pesticides, resulting in the loss of roosting sites and reductions in the abundance and diversity of insect prey. Roosts are typically within old woodpecker holes, rot holes or hollow dead branches in large, old deciduous trees. It is also likely that Bechstein's bat overwinters in tree hollows. This species switches roosts often and a colony can use as many as 60 roosts in a single breeding season.	Firstly, no habitat loss associated with the Proposed Development involves the drainage of wetland and all of the woodland resource would be retained. The Applicant is fully cognisant about potential impacts of the proposals on bats and a full detailed assessment of the potential impacts on bats, in particular Bechstein's bat, is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to provide for the retention, creation and enhancement of habitats. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development.
RR-208	Microclimate	Comment that the solar PV panels could increase reflective temperature at night following a day of hot weather and also altering the microclimate by	Solar PV modules do get hot when in direct sun, but do not have the thermal mass to retain heat after direct solar radiation stops and will quickly cool down.

		blocking sunlight, rainfall and affecting drainage potentially reducing the availability of invertebrate prey.	Based on the Applicant's experience of utility projects, the newer bifacial glass / glass panels block some, but not all the sunlight, unlike the older monofacial with a back sheet. This in turn creates a shaded, slightly cooler microclimate with less water evaporation where grass can thrive. The vegetation proposed underneath and around the panels has been designed to incorporate a range of legume species of value to pollinators and other invertebrate species. It is proposed to graze extensively under Solar PV with sheep, to help maintain floristic diversity as well as the droppings which would further benefit some species of invertebrates. This coupled with the suite of mitigation measures outlined in **Outline LEMP [EN010158/APP/7.6] [APP-142]** has been specifically designed to benefit invertebrate species and bat prey. How surface water runoff is proposed to be managed is detailed in the **Outline Drainage Strategy [EN010158/APP/7.11 [APP-147]**. It should be noted that Solar PV panels do not reduce the amount of rainfall that individual fields receive and in fact the shading effect caused by panels is likely to reduce evapotranspiration and may benefit vegetation growth and hence invertebrate biomass during very dry periods.
RR-208	Habitat connectivity	Comment that commuting corridors such as watercourses, hedgerows and treelines linking woodland blocks within and adjacent to the Order Limits provide safe passage for bats to travel between roosting and	The mitigation measures outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** have been designed to maintain linear features and also to ensure an appropriate buffer between key habitat features and the Proposed Development to safeguard flight lines and ensure connectivity across the wider landscape. These measures are

		foraging areas and provide an important foraging resource in their own right. Comments these corridors are vulnerable to disturbance through habitat loss and light pollution and research showing significantly reduced numbers of E. serotinus and *Myotis* spp. along boundaries bordering PV solar sites suggests that the panels may be causing some bats to alter their flight paths, potentially resulting in further fragmentation of the ecological landscape.	detailed in and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**.
RR-208	Cumulative effects	Comment that there have been a number of infrastructure projects in North Buckinghamshire including HS2, EWR, the Greatmoor incinerator, HMP Grendon Springhill, housing development, BESS and other solar projects planned which could affect local bat populations.	Cumulative impacts, including those on bat species, have been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060].** Using the Precautionary Principle, there is anticipated to be a potential long term, adverse inter-project cumulative residual effect on Bechstein's bat due to the modification of habitat (installation of Solar PV modules) for the duration of the operation (including maintenance) phase, with other developments located within the Bechstein's bat Core Sustenance Zone. This would be potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would be of a scale that would not impact the overall favourable conservation status of the species as the design of

			the Proposed Development and proposed mitigation measures focus on protecting and enhancing Bechstein's bat foraging and commuting habitat. Residual effects were not identified for other bat species.
RR-208	Research and monitoring	Comment that research into effects of solar farms on wildlife and monitoring of efficacy of mitigation strategies is inadequate and until this is resolved projects like the Proposed Development should not proceed.	The Applicant is fully cognisant of the scientific literature on the potential effects of solar farms on bats and this information has been used to inform the assessment undertaken. In addition, the Applicant has undertaken additional work to further inform the assessment in relation to bats and high frequency noise from electrical infrastructure which will be submitted at Deadline 1. The Applicant has committed within the **Outline LEMP [EN010158/APP/7.6] [APP-142]**) to a detailed post construction monitoring programme and is committed to funding additional research to inform the evidence base with regards bats and solar farms. Recently the Applicant has sponsored a PHD student in association with Exeter University looking at impacts of solar panels on biodiversity at its Longfield Solar Farm. Notwithstanding the above, the **Statement of Need [EN010158/APP/5.6] [APP-036]** sets out the case for the urgent and continuing development of an unprecedented capacity of new low-carbon generation schemes. It also explains that access to the UK's electricity network is limited, and therefore that using the available and currently under-utilised capacity on the transmission line to which East Claydon connects is critical to support the urgent deployment of low carbon generation assets required to decarbonise the

			UK's electricity system. In this regard, the Applicant has sought to maximise use of the connection capacity which is to be made available to it. The Proposed Development is therefore fully aligned with the direction of travel of relevant policy and action plans in support of achieving the government's ambition to achieve its Clean Power target, whilst being cognisant of the likely impacts on biodiversity and ensuring appropriate mitigation to address then potential impacts.

Table 2-28: Statkraft UK Limited

Reference number	Theme	Matter raised	Response
RR-252	Plot 7/2	Comments that the inclusion of plot 7/2 within the Order Limits, which East Claydon Energy Limited has an Option Agreement to deliver the East Claydon Greener Grid Park for, could affect the delivery of this project: • The proposed permanent acquisition of land and operational stage rights of plot 7/2 could sterilise the viability of the project. • Construction works at plot 7/2, with associated rights of compulsory acquisition and temporary use sought, could delay the project.	The Applicant confirms that it is not seeking permanent acquisition of plot 7/2, and is seeking the ability to acquire new rights, impose restrictive covenants and extinguish right over land. When undertaking the necessary due diligent checks to establish interest within the Order Limits, Statkraft's interests were not visible on the Land Registry title documentation, nor did the Applicant receive any formal confirmation from the landowner that any legal agreements had been completed. The Applicant has since met with Statkraft UK Limited to discuss the scheme, mitigation of impacts and ensure the ability for both projects to coexist. Alongside this, the Applicant has issued a Land Interest Questionnaire (LIQ) to receive confirmation

		• ECEL has the legal right to draw down lease over the land within the Option Agreement until 18 September 2031. • Engagement should consider whether co-existence of projects is possible. Request for ECEL's interest to be reflected in the **Book of Reference [EN010158/APP/4.3] [APP-018]** and engagement to confirm that compulsory acquisition powers will not be exercised in relation to plot 7/2.	as to the extent of its interests within plot 7/2 and the remainder of the Order Limits. Upon receipt of the LIQ, the Applicant will update the **Book of Reference [EN010158/APP/4.3] [APP-018]** and submit this at Deadline 1. The Applicant confirms that it would only use compulsory acquisition powers as a means of last resort or if breaches of legal agreements occur.
RR-252	Alternatives	Comment that the Applicant should demonstrate how it has considered alternatives sites to avoid development over the Option Land, and the use of related compulsory acquisition powers.	The **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. This report sets out the logical approach taken to inform the site selection process, starting from the point of connection at the National Grid East Claydon Substation, and using the criteria set out in section 2.10 of NPS EN-3 (2024). The search identified a single landowner, located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection. Discussions with other landowners in the area did not identify any alternative sites which met the site selection criteria,

			either because they were not interested in offering their land for solar development, or because they were pursuing alternative proposals on their land.

Table 2-29: The National Trust

Reference number	Theme	Matter raised	Response
RR-270	Setting of Claydon House and RPG	Agreement with the Applicant's assessment that there would not be a significant impact on the setting of the Claydon House and Registered Park and Garden during the construction and decommissioning phases of the Proposed Development, and that the National Trust does not have an objection in terms of changes to the setting of heritage assets at Claydon during these phases.	The Applicant is pleased to have reached agreement with The National Trust on this matter, and this will be captured within the Statement of Common Ground to be submitted at Deadline 1.
RR-270	Setting of Claydon RPG	Agreement with the Applicant's assessment that there would not be a significant impact on the setting of the Claydon Registered Park and Garden during the operational (including maintenance) phase of the Proposed Development.	The Applicant is pleased to have reached agreement with The National Trust on this matter, and this will be captured within the Statement of Common Ground to be submitted at Deadline 1
RR-270	Setting of Claydon House	Comment that assessment of the impact on the setting of the Claydon House during the operational (including maintenance) phase should consider views of the Proposed Development from the upper floors of	The Applicant considers that the use of the 3D model and reference to the existing photomontages within **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-115] [APP-116] [APP-117] [APP-118] has adequately

		Claydon House which contribute to its setting and significance as a heritage asset which may alter the outcome of the assessment.	informed the assessment. However, the Applicant is seeking access to the upper floors of Claydon House in order to provide the requested views at the earliest opportunity and will continue to liaise with Historic England and The National Trust on this matter. Two locations for additional visualisations / photomontages have been agreed with National Trust and Historic England, and this agreement will be captured within the Statement of Common Ground to be submitted at Deadline 1.
RR-270	Landscape and visual impact	Agreement with the assessment that there would not be a significant landscape and visual impact from PRoW/MCL/10/2 and wider parkland at Claydon during the construction and decommissioning phases.	The Applicant is pleased to have reached agreement with The National Trust on this matter, and this will be captured within the Statement of Common Ground to be submitted at Deadline 1.
RR-270	Landscape and visual impact	Concern that a moderate adverse visual effect (significant) of the Proposed Development on Claydon House could arise during operation and request for the Applicant to consider further mitigation measures, including: • Siting the Satellite Collector Compound as far from Claydon House as possible. • Additional screening e.g. a block of tree planting or poplar belt should be proposed should the Satellite Collector Compound be located in Parcel B23.	Two Satellite Collector Compounds are required as part of the Proposed Development, to consolidate the electricity generated by the Solar PV modules and export it to the Main Collector Compound, as well as manage the underground Interconnecting Cabling Corridor(s) across the Site, and/or provide local maintenance facilities. As described in the **Design Approach Document [EN010158/APP/5.8] [APP-038]** and shown in **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]**, two potential locations for Collector Compounds were initially identified within Parcel 1, Fields B10 and B23 (South), following an initial appraisal after

- Use of external materials on the Satellite Collection Compound that reflect those used on agricultural buildings on nearby farmstead (profiled steel cladding with a fibre cement roof in dark grey).
- Bold planting in the Order Limits nearest Claydon House and RPG to show regard to Claydon's wider historic designed landscape context, ideally with new hedge planting having regard to the historic field pattern as shown on the First Edition of the Ordnance Survey map for the area or on Tithe maps.
- Planting of additional boundary hedges to hide obtrusive 'zig-zag' edges of solar PV panels in the landscape.

the Stage 1 Design. These areas were considered suitable to potentially accommodate infrastructure up to 6m high, due to their location in relation to the proposed Solar PV layout and their reduced visibility from the surrounding area, including views from Claydon Park Registered Park and Garden and Claydon House. Following Phase Two Consultation, Field B10 was removed as a potential location for a Satellite Collector Compound to reduce potential impacts to the bat commuting and foraging corridor between Sheephouse Wood and Shrubs Wood. This decision also took into account the topography of this field and potential cultural heritage and landscape and visual effects from Claydon House.

The Satellite Collector Compound in Parcel 1 has therefore been sited in Field B23 (South) as the most suitable location when considering the full range of environmental constraints. The siting zone has been constrained, as secured by the **Works Plans [EN010158/APP/2.3.2] [AS-006]**, to minimise the impact on heritage assets so far as possible.

Embedded mitigation measures to soften and partially screen views of Solar PV and the Satellite Collector Compound from Claydon Park include infill hedgerow and tree planting along Three Points Lane and new hedgerow (advanced) planting along the eastern boundary in Field B22 and north of Field B23 (North). This is secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**.

While the exact colours and materials to be used on the exterior of the buildings and containers would be determined at the detailed design stage**, ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** outlines that these would be grey or painted green in colour and rendered to suit local building styles. Within the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**, this is captured as Commitment D16.

In relation to planting within the Order Limits nearest Claydon House, this is secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]** at Management Objective 13, which requires planting within Parcel 1 to *"respect the 'designed' character of the woodland blocks, retaining straight edges to the woodland blocks, in locations that relate to the historic wider landscape of Claydon House, ensuring the northern areas of Parcel 1 that relate visually to Claydon House appear more formal whilst other areas of the Site are more naturalistic"*.

Following Phase Two Consultation, additional Solar PV modules were removed from Fields B11 and B10 to mitigate the zig-zag effect as it was deemed that an additional hedgerow was not consistent with historic hedgerow pattern or the designed landscape as viewed from Claydon House.

RR-270	Construction traffic	Comment that traffic would increase on Claydon Road during the construction phase and this could cause disruption to visitors travelling to and from Claydon House, with consequent loss of revenue. Request for the oCTMP to make specific reference to Claydon House to ensure disruption to its visitors during the construction phase is minimised, with the following suggestions: • Inclusion of arrangements for the Principal Contractor to liaise regularly with National Trust to discuss and agree arrangements to reduce disruption. • Inclusion of a National Trust representative on the proposed Traffic Management Group. • Amendment of paragraph 3.2.4 to include National Trust in the preparation of a diary of local community events to reduce disruption on special event days for Claydon House.	Claydon Road would experience a total traffic increase of less than 30% (23.68%), which is not significant in EIA terms, as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058]. The National Trust's website for Claydon House notes that the recommended access route is as follows: "signposted A413 (Buckingham), A41 (Waddesdon crossroads). M40 junction 9 (Bicester) follow A41, turn off to Grendon Underwood and Calvert, signposted from Calvert Crossroads". This route from the A41 is not used by construction traffic as noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]. As such, there is no impact to visitors using the signposted route and traffic levels would not lead to congestion to Claydon House during peak periods for this property. The **Outline CTMP [EN010158/APP/7.5]** [APP-141] includes provision for the Principal Contractor to liaise with the host authority to prepare a diary of local community events. Where possible, HGV traffic flows would avoid moving on these days. Accordingly, the Applicant considers that the inclusion of a National Trust representative on the traffic group is not necessary.
RR-270	Covenant	Comment that The National Trust has no objection to proposed works (underground cable routes, access tracks and temporary	The Applicant notes the lack of objection to the works on land subject to a restrictive covenant and this will be captured within the Statement of

	construction compounds) on the land south of Claydon House within the Order Limits subject to a restrictive covenant held by The National Trust.	Common Ground with The National Trust to be submitted at Deadline 1.

2.5. Members of the public, landowners and businesses

2.5.1. The table below set out the responses to the Relevant Representations from members of the public, landowners and businesses not tabulated above, and the response from the Applicant.

Table 2-30: Members of the public, landowners and businesses

Reference number	Theme	Summary of matter raised	Response
Air quality			
RR-43, RR-112, RR-128, RR-195, RR-197, RR-199, RR-247	Air pollution	Comments that the Proposed Development would contribute to an increase of air pollution in the local area. Specific comments referenced the construction phase of the Proposed Development, and highlighted potential effects on the villages of	The Proposed Development is not anticipated to significantly increase air pollution in the locality of the Site. As per section 6.8.8 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]**, the Proposed Development is not predicted to generate Light Duty Vehicle movements exceeding relevant guidance screening criteria during the construction phase. The predicted construction phase Heavy Duty Vehicle generation slightly exceeds the screening criteria on A41 West, Station Road/Dewes Lane, Snake Lane/Fidlers Field and Claydon Road. However, construction traffic routes are planned to avoid passing sensitive villages and dwellings including Granborough and North Marston. Therefore, it is considered unlikely that any additional construction phase

Reference number	Theme	Summary of matter raised	Response
		Granborough and North Marston.	traffic emissions as a result of the Proposed Development would cause a significant adverse effect on local air quality and on nearby human receptors. Embedded mitigation, including setback distances from receptors (included within the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**) means that it is unlikely there would be a risk of emissions (either in isolation or combination) that could result in an exceedance of Air Quality Standards, as detailed in the **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]**. In terms of construction traffic-related air quality effects, the annual mean NO_2, PM_{10} and $PM_{2.5}$ concentrations at the Site are predicted to be within the relevant Air Quality Standard thresholds. In regard to potential dust impacts, as per section 6.9 of **ES Volume 2, Chapter 6: Air Quality [APP-049]**, dust emissions during construction and decommissioning phases can be effectively controlled by appropriate dust control measures with any potential adverse effects able to be greatly reduced or eliminated. Mitigation measures are documented within and would be secured by the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2] [APP-138]**, the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4] [APP-140]** and the

Reference number	Theme	Summary of matter raised	Response
			Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5] [APP-141].
RR-43	Air pollution	Comments that air pollution from the Proposed Development would have a long-term effect on physical and mental health.	**ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** recognises that air quality is a key influence in the quality of the environment in which a population lives, with implications for long-term health. Section 3.3 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** draws upon **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** to consider the potential for increased risk of health effects due to release of dust and particulate matter emissions from the Proposed Development activities and road traffic exhaust emissions during the construction and decommissioning phase of the Proposed Development. The temporary nature and low level of air pollution at the Site, combined with embedded mitigation including setback distances from receptors (included within the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**) means it is unlikely there would be a risk of emissions (either in isolation or combination) that could result in an exceedance of Air Quality Standards, with the **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]**.

Reference number	Theme	Summary of matter raised	Response
			In terms of construction traffic-related air quality effects, the annual mean NO_2, PM_{10} and $PM_{2.5}$ concentrations at the Site are expected to be within the relevant Air Quality Standard thresholds. With the adoption of mitigation measures (outlined and secured in the **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**), there would be a negligible risk for all activities for construction and decommissioning phases, resulting in the residual effect on human health being not significant.
RR-285	Air traffic	Comments that the Proposed Development would result in increased air traffic.	No air traffic is required for the construction, operation (including maintenance) or decommissioning of the Proposed Development, therefore, there would not be any increase in air traffic.
RR-29, RR-84, RR-247	Construction - dust	Comments that construction of the Proposed Development would increase dust in the local area.	As per section 6.9 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]**, dust emissions during construction and decommissioning phases can be effectively controlled by appropriate dust control measures with any potential adverse effects able to be greatly reduced or eliminated. Mitigation measures are documented within Table 6.16 of **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** and would be secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, **Outline DEMP [EN010158/APP/7.4] [APP-140]**and the **Outline CTMP [EN010158/APP/7.5] [APP-141]**.

Reference number	Theme	Summary of matter raised	Response
Alternatives			
RR-05, RR-06, RR-22, RR-34, RR-37, RR-38, RR-43, RR-61, RR-64, RR-73, RR-76, RR-78, RR-82, RR-84, RR-89, RR-91, RR-94, RR-96, RR-102, RR-122, RR-130, RR-141, RR-156, RR-168, RR-178, RR-179, RR-180, RR-182, RR-183, RR-209, RR-214, RR-215, RR-217, RR-218, RR-225, RR-235, RR-244, RR-245, RR-251, RR-253, RR-255, RR-257, RR-259, RR-260, RR-268, RR-269,	Alternative scales of solar	Comments expressing support for alternative scales of solar, including rooftop solar, solar installations on car parks and community-led solar schemes.	Large-scale ground mounted solar projects, like the Proposed Development, are required near connection(s) to the National Electricity Transmission System so that their benefits to be felt more widely. The **Statement of Need [EN010158/APP/5.6]** **[APP-036]** recognises that smaller decentralised and community energy schemes, including on rooftops, can make a valuable contribution to meeting on-site electricity demand for domestic and commercial users. Paragraph 3.3.12 of NPS EN-1 (2024) demonstrates the government's view that such schemes are needed alongside, but not instead of, large-scale ground mount solar schemes.

Reference number	Theme	Summary of matter raised	Response
RR-279, RR-282, RR-283, RR-289			
RR-06, RR-09, RR-11, RR-34, RR-43, RR-56, RR-73, RR-76, RR-82, RR-85, RR-89, RR-122, RR-130, RR-131, RR-134, RR-140, RR-141, RR-156, RR-177, RR-183, RR-206, RR-212, RR-213, RR-217, RR-238, RR-260, RR-262, RR-269, RR-272	Alternative technologies	Comments expressing support for other methods of energy generation, including Small Nuclear Reactors, onshore wind, offshore wind.	National policy calls for a mix of renewable and low-carbon energy sources in order to meet future energy demands. The starting point for the Proposed Development was the grid connection at National Grid East Claydon Substation, following which the Applicant sought nearby land that would be suitable. The area surrounding the National Grid East Claydon Substation is suitable for solar production, which is why solar is being pursued. A summary of the alternative energy generation technologies that were considered is provided within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047].
RR-02, RR-06, RR-08, RR-11, RR-14, RR-17, RR-24, RR-29, RR-30, RR-41, RR-43, RR-56, RR-58, RR-65, RR-78, RR-83,	Principle of development	Comments that solar technology is inefficient or unfit for the UK's climate.	The **Statement of Need [EN010158/APP/5.6]** [APP-036] recognises that solar panels and electrical infrastructure have become larger and more efficient, meaning that more electricity can now be generated from the same area of panel, and the same area of land than was previously possible. As a consequence, solar is now, and is expected to remain, a leading low-cost generation technology in the UK.

Reference number	Theme	Summary of matter raised	Response
RR-88, RR-104, RR-105, RR-108, RR-115, RR-125, RR-131, RR-132, RR-134, RR-138, RR-139, RR-140, RR-141, RR-142, RR-145, RR-151, RR-152, RR-156, RR-162, RR-164, RR-170, RR-171, RR-172, RR-174, RR-177, RR-188, RR-190, RR-199, RR-205, RR-212, RR-216, RR-219, RR-224, RR-225, RR-242, RR-243, RR-248, RR-249, RR-254, RR-256, RR-261, RR-265, RR-267, RR-278, RR-280, RR-287, RR-288			Additionally, as recognised within the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**, solar will continue to be necessary in making a significant contribution to the UK's renewable energy generating capacity. The Energy NPSs (2024) state that: • Large-scale solar is technically and economically feasible in the UK (NPS EN-3 (2024) Paragraph 2.10.14); • Large-scale solar can and will bring benefits (environmental, economic and social) for the UK (NPS EN-3 (2024) Paragraphs 2.10.11 and 2.10.89); • The demand for electricity is likely to increase significantly in the coming years (NPS EN-1 (2024) Paragraph 3.3.3); and • Increased flexibility in energy supply is needed (NPS EN-1 (2024) Paragraphs 3.3.3, 3.3.5 and 3.3.13).

Reference number	Theme	Summary of matter raised	Response
RR-31, RR-35, RR-43, RR-82, RR-92, RR-104, RR-78, RR-154, RR-155, RR-156, RR-182	Principle of development	Comments that solar technology will quickly become outdated and obsolete, meaning the Proposed Development should not be built.	As noted in the **Statement of Need [EN010158/APP/5.6]** [APP-036], solar has undergone significant technological advances in scale and commercial efficiency, and the UK has many areas of commercially viable solar irradiation. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations.
RR-11, RR-21, RR-31, RR-43, RR-45, RR-48, RR-78, RR-85, RR-87, RR-89, RR-94, RR-96, RR-98, RR-115, RR-116, RR-120, RR-134, RR-138, RR-140, RR-141, RR-168, RR_183, RR-190, RR-205, RR-209, RR-215, RR-220,RR-234, RR-235, RR-259, RR-269, RR-279, RR-287	Site selection	Comments that the proposed location of the Proposed Development is inappropriate and should be built elsewhere. Specific comments mentioned brownfield sites, Grey Belt land, industrial sites and sites near to existing transport links.	The Applicant respectfully disagrees. The **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027]) sets out the reasoning for why the Proposed Development is located in this particular location. This includes commentary on how the Site was selected considering a range of criteria, including proximity to the National Grid East Claydon Substation, existence of sufficient land to meet the scale of the Proposed Development's aims, accessibility, distance from dwellings and the desire to avoid the need for large-scale compulsory acquisitions. The Report goes on to confirm that the Applicant had considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility scale solar development. The search of Buckinghamshire Council's brownfield register confirmed that none of the brownfield sites

Reference number	Theme	Summary of matter raised	Response
			would have the capability of meeting the project objectives, largely due to the insufficient size of the sites. Grey belt land is defined within the NPPF (2024) as land within the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to the purposes of the Green Belt. The Order Limits is not located within, or in proximity to, the Green Belt.
RR-045, RR-190	Site selection	Comments that the rationale of siting the Proposed Development in this area is based on access to the National Grid, but this is not justified. Specific comments raise that a new substation is required and therefore it is not close to the current National Grid point of connection.	The **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2]** [**AS-027**]) sets out that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. Importantly, NPS EN-3 recognises that the distance to a connection can have a significant effect on project viability and that applicants; *"may choose a site based on a nearby available grid export capacity".* The influence on available grid export capacity on site selection is therefore justified. The **Statement of Need [EN010158/APP/5.6]** [**APP-036**] recognises that, due to the finite number of existing substations (and the smaller number of those substations with available capacity) new grid substations may be needed to connect the capacity of solar required to meet Net Zero. This is true in the Proposed Development's case.

Reference number	Theme	Summary of matter raised	Response
RR-209, RR-220	Site selection	Comments that the Applicant has not sufficiently considered alternative sites with lower impacts.	The Applicant respectfully disagrees with this statement. The **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. This sets out that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints.
Approach to EIA			
RR-30, RR-96	Adequacy of EIA	Comments that parts of the Order Limits, such as copses and hedges have not been adequately assessed and therefore the baseline is inaccurate.	The full detailed assessment of the potential impacts on hedgerows and woodland is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and is supported by an extensive suit of ecological surveys, of which hedgerows and woodland copses were adequately assessed as detailed within **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093]**, ensuring a robust baseline against which to assess the impacts of the Proposed Development.

Reference number	Theme	Summary of matter raised	Response
RR-238	Adequacy of EIA	Comments that the EIA has not been carried out adequately.	The environmental assessments have been undertaken in accordance with applicable legislation and guidance which has been tailored to each environmental factor of the EIA using industry standard methods and criteria, and professional opinion where appropriate. Further detail on the assessment approach and methodology applied to each environmental factor assessment is presented within the respective environmental factor assessment chapters (**ES Volume 2, Chapters 6 - 16 [EN010158/APP/6.2] [APP-049]** to **[APP-059]**).
RR-68	Use of Rochdale Envelope	Comment disagreeing with the application of the Rochdale Envelope due to uncertainty within the Application.	The approach to the assessment is set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048]**. It is necessary to maintain a degree of flexibility in the layout of the Proposed Development to account for technological advancements. This is a standard approach for Development Consent Orders to allow flexibility at the detailed design stage due to the timescales between the submission of the application and construction. The Rochdale Envelope approach ensures that the reasonable 'worst-case scenario' has been assessed in the Environmental Statement by assessing the development on a maximum parameters' basis. Should consent get granted, further design would be undertaken and further detail provided in the supporting management plans which would be discharged as a

Reference number	Theme	Summary of matter raised	Response
			requirement at the pre-construction stage of the Proposed Development.
Battery storage			
RR-01, RR-06, RR-17, RR-29, RR-32, RR-33, RR-36, RR-46, RR-47, RR-103, RR-120, RR-122, RR-126, RR-128, RR-131, RR-141, RR-142, RR-143, RR-160, RR-170, RR-171, RR-182, RR-195, RR-197, RR-199, RR-207, RR-219, RR-222, RR-225, RR-255, RR-262, RR-283, RR-285	Air pollution	Comments that there would be air pollution caused by a fire from the BESS, including concern that toxic gases would be emitted and would have health impacts for local residents and wildlife.	The Applicant has investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirm that in such an event, it would not pose significant risks to nearby human health receptors including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). In the very unlikely event that a battery fire did occur, it would be limited to one enclosure due to the design of the BESS compound. The assumption is that minimal intervention from Buckinghamshire and Milton Keynes Fire Authority is required during a thermal runaway event. Boundary cooling of adjacent equipment could be carried out, and the BESS unit under thermal runaway would be allowed to burn out to remove the risk of stranded energy in the battery system. A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely

Reference number	Theme	Summary of matter raised	Response
			unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and the results will be submitted at Deadline 1. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low.
RR-68	Capacity	Comment that the capacity of the BESS is unclear.	As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**, the Applicant has a grid connection agreement with NESO to import and export 500MW (AC) of clean power, which has been requested to be reduced to 335MW (AC). Therefore, the BESS agreement is also for 500MW import and export currently.

Reference number	Theme	Summary of matter raised	Response
			It is expected that the grid connection agreement will be updated by NESO, to reflect the reduced value by Q3 2026.
RR-103, RR-120	Consultation	Request for the local fire and rescue services to be statutory consultees.	In line with Schedule 1 of the APFP Regulations 2009 (as amended), the Applicant consulted with host and neighbouring fire and rescue services for the Proposed Development as part of its pre-application consultation activity (please see **Consultation Report Appendices E-1 and F-1 [EN010158/APP/5.2]** [**APP-025**]). It should be noted that as part of the DCO Application, the Applicant has submitted a Statement of Common Ground with the Buckinghamshire and Milton Keynes Fire Authority (**Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11]** [**APP-041**]).
RR-209	Electromagnetic disturbance	Comment that the BESS could cause electromagnetic disturbance.	The impacts of electromagnetic fields upon human health have been assessed within **ES Volume 4, Appendix 5.6: EMF Assessment [EN010158/APP/6.4]** [**APP-084**] which considers the proposed electrical infrastructure. The assessment concludes no significant impact is predicted due to levels of electromagnetic radiation being below the ICNIRP (International Commission on the Non-Ionizing Radiation Protection) reference levels for magnetic and electric fields.

Reference number	Theme	Summary of matter raised	Response
RR-96, RR-126, RR-171, RR-209	Emergency plan	Comment that there should be a plan in place for responding to BESS fires and potential pollution.	During the detailed design stage, an Emergency Response Plan would be prepared and agreed with BMKFA. This would be submitted as part of the discharge of requirements process prior to construction. The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." Large Scale Fire Testing (LSFT) is now a mandatory requirement for all BESS designs under the recently published NFPA 855 (2026) revision. The detailed design phase of the Proposed Development would consider the lifecycle of the BESS from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS design would have completed LSFT to fully inform inputs for risk assessment tools which would be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. This includes the layout of the BESS and additional

Reference number	Theme	Summary of matter raised	Response
			BESS equipment to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009])** to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant has ongoing dialogue with statutory consultees such as the UK Health Security Agency and BMKFA. Draft Statements of Common Ground have been provided with both with regards to the Plume Study Requirements and BESS safety (see **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]** and **Draft Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12] [APP-042]**). The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149].** These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, the off-site impacts aren't significant (toxic emissions, pollution

Reference number	Theme	Summary of matter raised	Response
			risks, and visibility impacts) to all sensitive receptors within a 1km radius of the BESS site. The closest residential receptors to the proposed BESS compound (approx. 400 metres) is Borshaw Farm. The criteria in the SLOT and SLOD analysis within the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** relate to localised BESS site safety for the first responders and the site operatives. This is a key aspect of the risk assessment and consequence modelling and is supplemented by the Preliminary Air Quality Assessment that has been subsequently carried out. The results of this assessment will be submitted at Deadline 1. A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low.
RR-01, RR-06, RR-11, RR-14, RR-17, RR-29, RR-30, RR-32, RR-33, RR-36, RR-37, RR-43, RR-46, RR-47, RR-52, RR-58, RR-67, RR-68, RR-71, RR-78,	Fire risk	Comments that there would be an unacceptable fire risk from the BESS. Specific comments reference difficulty of extinguishing a BESS fire, thermal runaway, recent experience of a battery fire in Westcott and	During the detailed design stage, an Emergency Response Plan would be prepared and agreed with BMKFA, submitted as part of the discharge of requirements process prior to construction. The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems."

Reference number	Theme	Summary of matter raised	Response
RR-84, RR-88, RR-103, RR-104, RR-105, RR-116, RR-120, RR-122, RR-126, RR-128, RR-131, RR-132, RR-138, RR-141, RR-142, RR-143, RR-153, RR-157, RR-160, RR-170, RR-171, RR-177, RR-182, RR-197, RR-199, RR-207, RR-210, RR-219, RR-220, RR-222, RR-225, RR-231, RR-244, RR-246, RR-248, RR-255, RR-262, RR-277, RR-283, RR-285, RR-288		potential impacts on human health and wildlife.	LSFT is now a mandatory requirement for all BESS designs under the recently published NFPA 855 (2026) revision. The detailed design phase of the Proposed Development would consider the lifecycle of the battery system from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS design would have completed LSFT to fully inform inputs for risk assessment tools which would be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]**) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant has ongoing dialogue with statutory consultees such as the UK Health Security Agency and BMKFA. Draft Statements of Common Ground have been provided with both

Reference number	Theme	Summary of matter raised	Response
			consultees with regards to the Plume Study Requirements and BESS safety (see **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]** and **Draft Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12] [APP-042]**). The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, the offsite risks aren't significant (toxic emissions, pollution risks, and visibility impacts) to all sensitive receptors within a 1km radius of the BESS site. The closest residential receptors to the proposed BESS compound (approx. 400 metres) is Borshaw Farm. As mandated in NFPA 855 (2026), LSFT and/or full scale destruction testing to establish minimum equipment spacing distances coupled with rigorous site-specific consequence modelling would be conducted for the selected BESS design, validating site equipment spacing to demonstrate that loss would be safely limited to one enclosure without the intervention of the BMKFA.

Reference number	Theme	Summary of matter raised	Response
			Site and BESS design principles and ERP content would ensure that the BMKFA is expected to employ a defensive strategy i.e. only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment, this ensures that environmental pollution risks are minimised. Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance states: "*If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly.*" LSFT and site-specific consequence modelling should ensure that only minimal intervention from BMKFA would be required during a thermal runaway event. If necessary, boundary cooling of adjacent equipment could be carried out, and the BESS unit under thermal runaway would be allowed to burn out to remove the risk of stranded energy in the battery system. The criteria in the SLOT and SLOD analysis within the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** relate to localised BESS site safety for the first responders and the site operatives. This is a key aspect of the risk assessment and consequence modelling and is supplemented by the Preliminary Air Quality Assessment that

Reference number	Theme	Summary of matter raised	Response
			has been subsequently carried out and the results will be submitted at Deadline 1. The results of this assessment show no exceedances of any AEGLs and AQSs at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low.
RR-58	Fire risk	Comments expressing concern about evacuation plans for vulnerable residents in the event of a BESS fire.	The Applicant has investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, the off-site impacts aren't significant (toxic emissions, pollution risks, and visibility impacts) to all sensitive receptors within a 1km radius of the BESS site. The closest residential receptors

Reference number	Theme	Summary of matter raised	Response
			to the proposed BESS compound (approx. 400 metres) to Borshaw Farm. The Emergency Response Plan produced at the detailed design stage would incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. Given the buffer zones to all sensitive receptors, it is highly unlikely that evacuation plans would be required. The UKHSA is a statutory consultee for the Proposed Development, and the Applicant must satisfy the UKHSA that if a BESS fire occurs there are no significant impacts on air quality levels which would impact vulnerable members of the local community. The Applicant has been in regular discussions with the UKHSA which has confirmed that the work that the Applicant has undertaken to date suggests that the risk to the public health for nearby receptors from a BESS fire event is likely to be low. A letter confirming this conclusion will be shared as part of the Application at Deadline 1 and the Statement of Common Ground with UKHSA will be updated to reflect this position [**EN010158/APP/5.12**] [**APP-042**].
RR-14, RR-37, RR-67, RR-103, RR-120, RR-126, RR-171, RR-177, RR-220, RR-225	Fire risk	Concerns around the inability of emergency services to respond to BESS fires due to lack of access.	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage

Reference number	Theme	Summary of matter raised	Response
		Specific comments raised that a single access point into the BESS compound is not sufficient.	Systems." For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]**) to ensure safe access and egress for any emergency services that may need to respond to an event. BMKFA is a statutory consultee, and the **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]** will be updated and agreed throughout examination as necessary to ensure that all FRS safety and emergency response requirements are accommodated and secured through the DCO.
RR-33, RR-171, RR-262	Fire risk	Concern that local emergency services would become strained as a result of the increased risk of BESS fires.	The Applicant has investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**.

Reference number	Theme	Summary of matter raised	Response
			Large Scale Fire Testing is now a mandatory requirement for all BESS designs under the recently published NFPA 855 (2026) revision. The detailed design phase of the Proposed Development would consider the lifecycle of the battery system from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS design would have completed LSFT to fully inform inputs for risk assessment tools which would be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. In the very unlikely event that a battery fire did occur, the layout has been designed to limit the fire to one enclosure due to the design of the BESS site. The assumption is that minimal intervention from BMKFA is required during a thermal runaway event. Boundary cooling of adjacent equipment could be carried out, and the BESS unit under thermal runaway would be allowed to burn out to remove the risk of stranded energy in the battery system. The Applicant has ongoing dialogue with BMFKA, as demonstrated in the submitted **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]**. The Statement of Common Ground is a live document and will be amended

Reference number	Theme	Summary of matter raised	Response
			as the examination progresses in order to enable a final version to be submitted to the Examining Authority (ExA).
RR-45, RR-68, RR-71, RR-126, RR-222	Fire risk	Comments that the risk of fire is compounded by multiple BESS projects planned in the local area, as well as the fire risk of other elements of the Proposed Development including the inverters and substation.	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." This includes the design and layout of the BESS assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, or nearby BESS developments as well as suitable preventative measures and preparing an Emergency Response Plan to a thermal runaway event. LSFT is now a mandatory requirement for all BESS designs under the recently published NFPA 855 (2026) revision. The detailed design phase of the Proposed Development would consider the lifecycle of the battery system from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS design would have completed LSFT to fully inform inputs for risk assessment tools which would be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. Final BESS design and site layout would have been validated through mandatory LSFT and rigorous consequence

Reference number	Theme	Summary of matter raised	Response
			modelling to minimise the requirement for any FRS intervention in a thermal runaway incident. LSFT must validate minimum safe equipment spacing distances to demonstrate there is no fire propagation to adjacent BESS enclosures. FRS intervention in the worst-case scenarios would typically be limited to boundary cooling of adjacent BESS units to prevent the fire from spreading. This strategy would be finalised with the BMKFA and be clearly communicated in the Emergency Response Plan: • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.2] [AS-**

Reference number	Theme	Summary of matter raised	Response
			009]) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant has ongoing dialogue with statutory consultees such as the UK Health Security Agency and BMKFA. Draft Statements of Common Ground have been provided with both consultees with regards to the Plume Study Requirements and BESS safety (see **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]** and **Draft Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12] [APP-042]**). The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, the off-site risks aren't significant, including to the closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm). The criteria in the SLOT and SLOD analysis within the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** relate to localised BESS site safety for the first responders and the site operatives. This is a key aspect of the

Reference number	Theme	Summary of matter raised	Response
			risk assessment and consequence modelling and is supplemented by a Preliminary Air Quality Assessment that has been carried out. The results of this assessment will be submitted at Deadline 1. The results of this assessment show no exceedances of any AEGLs and AQSs at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. A layer of protection analysis has estimated that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that the risk to the population remains very low.
RR-30, RR-78, RR-104, RR-115, RR-133, RR-146, RR-163, RR-170, RR-171, RR-190, RR-209, RR-219, RR-220, RR-221,	General comment – BESS safety	Comment that the BESS would be unsafe.	The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." LSFT is now a mandatory requirement for all BESS designs under the recently published NFPA 855 (2026) revision. The

Reference number	Theme	Summary of matter raised	Response
RR-236, RR-246, RR-255			detailed design phase of the Proposed Development would consider the lifecycle of the battery system from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS design would have completed LSFT to fully inform inputs for risk assessment tools which would be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. The Applicant has conducted a layer of protection analysis (LOPA) to evaluate the probability of a BESS thermal runaway event occurring, the exercise concluded that the frequency of a cell venting event leading to thermal runaway is extremely unlikely. The **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** has demonstrated that if a BESS fire event does occur the risk to the local community remains very low. For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative**

Reference number	Theme	Summary of matter raised	Response
			Layout Plans and Sections [EN010158/APP/2.6.2] [AS-009]) to ensure safe access and egress for any emergency services that may need to respond to an event. The Applicant has ongoing dialogue with statutory consultees such as the UK Health Security Agency and BMKFA. Draft Statements of Common Ground have been provided with both consultees with regards to the Plume Study Requirements and BESS safety (see **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11] [APP-041]** and **Draft Statement of Common Ground – UK Health Security Agency [EN010158/APP/5.12] [APP-042]**). The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. The criteria in the SLOT and SLOD analysis within the **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]** relate to localised BESS site safety for the first responders and the site operatives. This is a key aspect of the risk assessment and consequence modelling and is supplemented by a Preliminary Air Quality Assessment that has been carried out. The results of this assessment will be shared at Deadline 1.

Reference number	Theme	Summary of matter raised	Response
			The results of this assessment show no exceedances of any AEGLs and AQSs at any sensitive receptor within a 1km radius due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low.
RR-40, RR-130	General comment – BESS	Comments expressing support for the BESS element of the Proposed Development.	This comment is noted. More information about the role of the BESS element of the Proposed Development is provided in the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**.
RR-207	Ground contamination	Comments that there would be ground pollution caused by any fire from the BESS.	The Applicant has considered this issue carefully, as it is acknowledged that sensitive groundwater resources are present beneath the Site which could be affected by pollution of the ground during a fire incident at the BESS. In order to ensure that the Proposed Development does not pollute the ground and groundwater receptors, mitigation measures are incorporated in the **Outline BSMP [EN010158/APP/7.9]** **[APP-145]** which would be followed in the unlikely event of a fire incident at the BESS. The drainage system at the BESS would ensure that all firewater is collected during an incident, and no fire-fighting water would be released directly to the surrounding ground or into groundwater or surface water features. After an incident has concluded, any collected fire-

Reference number	Theme	Summary of matter raised	Response
			fighting water would be analysed, and it would be confirmed whether it requires off-site removal, or if it can be treated and/or retained on-site safely. Further details relating to these issues will be covered in the detailed Battery Safety Management Plan.
RR-29, RR-60, RR-104, RR-131, RR-143	Location	Comment that the proposed location of the BESS is inappropriate due to its proximity to a village.	During the Phase Two Consultation, the location of BESS was refined to Fields D8 and D9 in Parcel 2, and E23 in Parcel 3 (see **Consultation Report Appendices I-1 [EN010158/APP/5.2] [APP-028]**). The **Design Approach Document [EN010158/APP/5.8] [APP-038]** notes in Paragraph 5.5.16 that the feedback received to the consultation informed the removal of BESS being proposed in Field E23. The feedback included concerns of the visibility of Field E23 from Botolph Claydon and East Claydon. Resultingly, BESS was removed from Field E23 in Parcel 3 and this design change was consulted on via a Targeted Consultation. Whilst Fields D8 and D9 in Parcel 2 are spatially closer to Botolph Claydon (but not East Claydon) versus Field E23 in Parcel 3, locating the BESS in Parcel 2 would see it set down into the landscape more, with higher landform behind it. This therefore reduces the BESS' prominence in the skyline when compared against BESS in the flatter Parcel 3. This factor is detailed further in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**.

Reference number	Theme	Summary of matter raised	Response
			The Applicant has investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]** and **BESS Plume Assessment Summary [EN010158/APP/7.13] [APP-149]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to all close sensitive receptors within a 1km radius of the proposed BESS compound. The closest residential property is situated approx. 400 metres away (Borshaw Farm). The UKHSA is a statutory consultee for the Proposed Development, and the Applicant must satisfy the UKHSA that should a BESS fire occur, that there are no significant off-site impacts on air quality levels which would pose serious health risks to the local community. The Applicant has been in regular discussions with the UKHSA which has confirmed that the work that the Applicant has undertaken to date suggests that the risk to the public health for nearby receptors from a BESS fire event is likely to be low. A letter confirming this conclusion will be shared as part of the Application at Deadline 1 and the Statement of Common Ground with UKHSA will be updated to reflect this position **[EN010158/APP/5.12] [APP-042]**.

Reference number	Theme	Summary of matter raised	Response
RR-82	Location	Comment that the BESS should be located closer to the point of use.	As set out more fully in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], there are a number of factors that have resulted in the BESS being located in Parcel 2. These include potential for noise and visual impacts for residents of Sion Hill Farm, Botolph Claydon and East Claydon if the BESS were to be located in Parcel 3, as well as impacts on businesses/tenant farmers. This was confirmed through feedback received during the Phase Two Consultation on the proposed BESS location within Field E23 of Parcel 3. The BESS is proposed within Fields D8 and D9 of Parcel 2, which are in close proximity to Claydon Road to facilitate access and avoid traffic passing through local villages. The fields are also set down in the landscape and are less visible from Botolph Claydon and Quainton Hill than Field E23. They also have relatively few visual receptors, such as individual properties, settlements and PROW compared to other areas of Parcel 2.
RR-103, RR-120	Management	Comments that BESS sites should be managed by the Health and Safety Executive due to safety risks.	The Health and Safety Executive (HSE) has a Grid-scale battery energy storage systems webpage, which sets out relevant health and safety legislation for BESS including: • The Health and Safety at Work Act 1974, which places legal duties on employers to manage risks to employees, other workers and the public. • The Management of Health and Safety at Work Regulations 1999, which requires employers to identify

Reference number	Theme	Summary of matter raised	Response
			potential risks to employee health and safety and appropriately manage them. The Act is not prescriptive about which risks must be considered, it is for employers to assess their specific situation and take the necessary measures to mitigate risks. For further information on how employers should assess and manage risks, see guidance by the HSE. • The Electricity at Work Regulations 1989, which requires all work activities that uses or might be affected by electricity to be done safely. All foreseeable risks must also be assessed and minimised as far as possible. For further information, see the HSE's guidance on the 1989 Regulations. • The Dangerous Substances and Explosive Atmospheres Regulations 2002, which requires employers to identify the risks posed by dangerous substances (which are substances that may be explosive, flammable or oxidising) in the workplace. Employers must put in place measures to remove risks to the safety of employees and others or, if it is not possible to fully remove risks, mitigate them and limit the effects of potential incidents involving the dangerous substances. • The Construction Design and Management Regulations 2015, which sets requirements to ensure construction

Reference number	Theme	Summary of matter raised	Response
			projects are carried out in a way that secures health and safety, from conception to completion. • The Dangerous Substances (Notification and Marking of Sites) Regulations 1990 (NAMOS), which requires the operators of sites that hold 25 tonnes or more of a dangerous substance to notify their local fire and rescue service in writing, and to display signs. The HSE stipulates that if developers and operators comply with the above regulations then the health and safety risks of BESS are fully mitigated. The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." For further information relating to how the Proposed Development has complied with NFCC guidance, please see section 2.2 of the **Outline BSMP [EN010158/APP/7.9] [APP-145]**.
RR-32, RR-104, RR-116, RR-236	Need	Comment that the BESS is not required as there are other BESS projects nearby.	The proposed BESS element of the Proposed Development would support the solar development by storing generated electricity and exporting it to the National Grid at times of demand. It is intrinsically linked to the principal development in

Reference number	Theme	Summary of matter raised	Response
			that it provides support to increase operational efficiency in a way that the principal development cannot achieve on its own.
RR-219	Need	Comments that the BESS element of the project is flawed as it could only store energy for a period of three hours before having to discharge and therefore would not extend the supply of energy from the solar PV.	The Applicant does not agree with this representation. Section 6.11 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** provides detailed information on BESS functions and BESS operation. In particular, Paragraph 6.11.66 explains that: *"once charged, a lithium-ion BESS is able to hold its charge without significant depletion (charge leakage) for periods of days, meaning that BESS are able to import energy one day and export it the next."* The capacity of the BESS, in MW, and its rate of discharge (MWh) influence the period over which the BESS could release the energy generated by the Proposed Development. The proposed BESS element of the Proposed Development would support the solar development by storing generated electricity and exporting it to the National Grid at times of demand. It is intrinsically linked to the principal development in that it provides support to increase operational efficiency in a way that the principal development cannot achieve on its own.
RR-58, RR-67, RR-82, RR-190	Scale	Comments that the proposed scale of the BESS is insensitive to the local area.	The size and location of the BESS has been carefully considered, balancing the efficiency of the Proposed Development with the most efficient use of the land and avoiding unacceptable impacts.

Reference number	Theme	Summary of matter raised	Response
			With regard for design, the **Design Approach Document [EN010158/APP/5.8] [APP-038]** explains how the design of the BESS has taken account of: avoiding BMV land; being located outside of Flood Zone 2 and 3 areas; being located outside of medium and high risk surface water flooding areas; being in proximity to points of access to Site, avoiding construction traffic passing through nearby villages; being in proximity to the National Grid East Claydon Substation; the scale and topography of the landscape; the proximity of sensitive visual and heritage receptors and the presence of existing infrastructure.
RR-11, RR-43, RR-116, RR-126, RR-138, RR-171, RR-255	Water pollution	Comments that there would be water pollution caused by fire from the BESS, including that a plan should be provided to manage contaminated water runoff.	In the unlikely event of a fire, site design measures would be in place to contain and manage any contaminated runoff, including impermeable surfaces and controlled drainage with isolation capability. Any retained firewater would be removed and disposed of by licensed contractors in accordance with environmental regulations. As a result, the Proposed Development is not expected to pose a risk to water quality. The potential for water pollution from firewater runoff associated with the BESS would be managed through the measures secured in the **Outline BSMP [EN010158/APP/7.9] [APP-145].**
Biodiversity			

Reference number	Theme	Summary of matter raised	Response
RR-01, RR-36, RR-71, RR-160, RR-209, RR-210, RR-220	Ancient woodland	Comment that there is concern about the proximity of the Proposed Development to ancient woodland.	As noted within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] all woodland habitat would be retained. The embedded mitigation detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] and secured by the **Outline LEMP [EN010158/APP/7.6]** [APP-142] includes a minimum 30m offset from ancient woodland to the fenceline which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect ancient woodland sites. The 30m buffers are considered a substantial distance in which habitat creation is proposed to provide suitable commuting and foraging routes for bats, maintaining links between existing woodland blocks and providing connectivity to the wider landscape. In order to access areas proposed for landscaping and environmental habitat creation in Parcel 1a, an existing track, located within Romer Wood and Greatsea Wood (ancient woodland within the Order Limits), would be used to allow light vehicles, such as tractors, to access this area for habitat creation works. This track is currently used by maintenance traffic associated with HS2 landscape planting. No loss of ancient woodland would be required as the existing track would be utilised.
RR-43, RR-68, RR-71, RR-96	Approach to assessment	Comment that ecological surveys are incomplete	The full detailed assessment of the potential impacts on biodiversity is presented in **ES Volume 2, Chapter 7:**

Reference number	Theme	Summary of matter raised	Response
		and do not accurately reflect existing wildlife and habitats.	**Biodiversity [EN010158/APP/6.2] [APP-050]**, which is supported by an extensive suite of ecological surveys (some carried out over multiple years) ensuring a robust baseline against which to assess the impacts of the Proposed Development. It is the Applicant's view that it has had due recognition of the ecological sensitivities that the site presents. CIEEM Guidance on the lifespan of ecological reports does suggest that ecological surveys may need to be updated depending on a variety of factors, including the age of the survey date together with other factors such as whether there has been any significant material changes to the habitat composition and distribution on site. An ecologist should use professional judgement to determine if ecological surveys need to be repeated. It also needs to be recognised that all survey work is a snapshot in time and what is important is that the survey data is sufficient to inform the ecological assessment. It is the Applicant's view that the survey data collected, some of it covering multiple survey years, is more than sufficient to inform the ecological assessment. It should also be noted that the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6] [APP-142]** and the **Outline CEMP [EN010158/APP/7.2] [APP-138]** contain commitments to update species specific survey work prior to construction, for example badgers and other legally protected species. Paragraph 2.5.1 of **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025)**

Reference number	Theme	Summary of matter raised	Response
			[EN010158/APP/6.4] **[APP-093]** has not identified any significant constraints relating to the timing of survey work.
RR-68, RR-71	Approach to assessment	Comment that the ecological assessment is insufficient as the surveys have only covered the main development parcels rather than the whole site, meaning areas proposed for cable routing, internal tracks and access have not been assessed for their ecological value.	The cable routes have been subject to Ecological Appraisal and habitat survey as outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** **[APP-050]**. It is correct that the only area where detailed species-specific survey work has not occurred is the cable route corridor as the impacts would be short-term and temporary, and sufficient detail has been gained from the extensive species-specific surveys on adjacent parcels of land to be able to robustly assess the potential effects of the cable route works. It is the Applicant's view that the survey data collected, some of it covering multiple survey years, is more than sufficient to inform the ecological assessment. It should also be noted that the **Outline LEMP [EN010158/APP/7.6]** **[APP-142]** and the **Outline CEMP [EN010158/APP/7.2]** **[APP-138]** contain commitments to update species specific survey work prior to construction, for example badgers and other legally protected species.
RR-68	Assessment	Query the discrepancies between wintering bird surveys conducted in 2022-3 and 2023-4 (increased number of species observed and	Surveys for wintering birds were undertaken between October 2021 - March 2022, and between November 2023 - March 2024. No survey work was undertaken in Parcel 3 during 2023-2024 as access could not be obtained. However, the Applicant had data for Parcel 3 from 2021/22 and from adjacent fields in 2023/24. This, combined with the fact that

Reference number	Theme	Summary of matter raised	Response
		large increases in numbers), and how this has been reflected in the Outline LEMP.	arable and improved grassland present in Parcel 3 is well represented elsewhere on-site, means the Applicant has sufficient data on which to base its assessment. Further detail on the wintering bird surveys is available within **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4] [APP-089]** and **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4] [APP-097]**.
RR-141	Badger	Comment that there would be a negative effect on badger from the Proposed Development.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has not identified any significant effects in relation to badgers. The Proposed Development would maintain existing setts in situ where practicable. Retention of woodland and hedgerows, together with the associated buffers, means that badger would be able to move around the landscape and forage. In addition, security fencing around the solar PV areas would not be buried, enabling badgers to push under at low points and forage under panels. Grassland enhancement both under Solar PV and elsewhere within the Order Limits is likely to increase foraging provision for badgers. Pre-construction badger surveys would be undertaken to confirm status of existing badger setts and to identify the presence of any new setts with appropriate buffers maintained to prevent disturbance or damage to setts. Pre- construction surveys are detailed within and secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138].** In the unlikely event that a

Reference number	Theme	Summary of matter raised	Response
			sett cannot be avoided, then sett closure would be considered under the appropriate licensing regime. There is a commitment within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** for the provision of badger gates within the fencing so badgers can continue to access the Site if required. The exact location of gates would be dictated by the pre-construction surveys.
RR-029, RR-71, RR-105, RR-120, RR-141	Bats	Comment that there would be a negative effect on bats from the Proposed Development.	The Applicant is fully cognisant about the potential effects of the Proposed Development on bats (in particular Bechstein's) and a full detailed assessment of this is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs, and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting and pond creation. This would create a coherent ecological network to link the Site to the wider

Reference number	Theme	Summary of matter raised	Response
			landscape, supporting the movement of local wildlife, particularly bats. Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development and Solar PV is no longer proposed in a number of fields, including from: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane. • Field D27, adjacent to the eastern edge of Runts Wood. Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI (known to support breeding colonies of Bechstein's bats and other bat species). Instead, these areas would be used to provide mitigation for bats including increased foraging resources, woodland edge habitat and connectivity (see **Appendix 2: Landscape and Ecological Mitigation and Enhancements** of the **Outline LEMP [EN010158/APP/7.6] [APP-142])**. Perimeter fencing surrounding the Solar PV would be offset at least 30m from existing woodland and hedgerows located

Reference number	Theme	Summary of matter raised	Response
			along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood. Perimeter fencing surrounding the Solar PV would be offset at least 15m either side from the centreline of existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow creating a substantial linear feature at least 30m wide between Sheephouse Wood, Shrubs Wood and Decoypond Wood to reduce potential displacement effects. Perimeter fencing surrounding the Solar PV would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity were recorded. Early planting and habitat management is proposed within Parcel 1 (hedgerows between Shrubs Wood, Decoypond Wood and Sheephouse Wood), Parcel 1a, Parcel 2 (along the boundary of Fields D30, D29 and D28, and hedgerows along boundary of Fields D30, D34 and D37) ahead of construction activities starting. This strategic planting is proposed to improve foraging and commuting habitat for bats between woodland blocks; and improve connectivity across the Site and to the wider landscape. In addition, during the design of the Proposed Development steps were taken to minimise effects to bats. This included the removal of a Collector Compound from Field

Reference number	Theme	Summary of matter raised	Response
			B10 (adjacent to Shrub's Wood) since Phase Two Consultation (see **Outline LEMP [EN010158/APP/7.6] [APP-142]**).
RR-84, RR-89, RR-220, RR-229	Biodiversity Net Gain	Comment that there is concern that the Biodiversity Net Gain would not be delivered or not be commensurate to the magnitude of impact and that a BNG should be delivered.	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** indicates a substantial net gain would be delivered by the Proposed Development well above the minimum 10% requirement outlined by the Environment Act. The delivery of a minimum 40% net gain for habitat area, 17% for hedgerow and 10% for watercourses is secured via Requirement 7 of the Draft DCO **EN010158/APP/3.1.2] [AS-010]** and therefore would be a legal requirement. The habitat creation and enhancement that deliver this net gain and the long-term management objectives are presented in and would be secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142].**
RR-08, RR-29, RR-58, RR-68, RR-71, RR-83, RR-103, RR-105, RR-120, RR-141, RR-155, RR-160, RR-197, RR-209, RR-214, RR-285	Birds	Comment that there would be a negative effect on birds from the Proposed Development. Specific reference made to owls, skylarks, kites, buzzards, sparrow hawks, woodpeckers, swifts,	The embedded mitigation secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]** includes for the creation and/or improvement of species-rich grassland, scrub, hedgerows, arable field margins and retention of all woodland, resulting in an increase of suitable foraging habitat for barn owl, red kite, hobby and peregrine falcon across the Site. Specifically for ground nesting birds including skylark, the embedded design and additional mitigation measures are

Reference number	Theme	Summary of matter raised	Response
		swallows, ground nesting birds.	anticipated to provide a long-term, beneficial effect in quantity of foraging habitat and quality of nesting habitat once fully established during the operation of the Proposed Development which is considered to be significant at the Local level, as detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. All woodland and the majority of hedgerow habitat would be maintained and available for wintering birds as it is now. In addition, the proposed mitigation areas would see the creation and enhancement of extensive areas of grassland habitat. During the construction and decommissioning phases, displacement through disturbance due to the installation/removal of Solar PV modules and associated infrastructure is predicted to occur to ground nesting, non-ground nesting birds and Schedule 1 bird species. Measures to safeguard ground nesting birds, non-ground nesting birds and Schedule 1 bird species during these phases are outlined within the **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**.
RR-08, RR-29, RR-105, RR-141, RR-143, RR-155, RR-197, RR-217, RR-260, RR-285, RR-286	Deer	Comment that there would be a negative effect on deer from the Proposed Development.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** has not identified a significant impact on deer. All woodland would be retained and significant buffers from woodland and hedgerows would enable deer to move through the landscape as each field proposed for Solar PV is fenced in the middle rather than a fence around the Proposed

Reference number	Theme	Summary of matter raised	Response
			Development. In addition, 93ha of grassland would be enhanced to provide additional foraging habitat for deer and they would also be able to use habitat within cable route areas once the cable route is installed as these areas would be returned to agricultural use.
RR-06, RR-215, RR-219, RR-220	Designations	Comment that the local area has a number of special ecological designations which makes the Proposed Development inappropriate, such as SSSIs deriving from Bernwood Forest.	The Applicant is aware of the importance of these areas of woodland (Sheephouse Wood SSSI, Finemere Wood SSSI, Grendon and Doddershall Woods SSSI, Ham Home-cum-Hamgreen Woods SSSI, Greatsea Wood LWS, Shrub Woods LWS, Decoypond Wood LWS, Romer Wood LWS, Runts Wood LWS, Finemere WTR, Home Wood, Middle Claydon LWS and Balmore Wood LWS) that are located adjacent and within close proximity of the Proposed Development, as outlined and assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** The layout of the Proposed Development and embedded design principles have been designed to ensure the retention of these sites. For example, embedded design principles include a minimum standoff distance from Solar PV and associated infrastructure from these sites. Standard environmental protection measures during the construction and decommissioning phases would be implemented to ensure no direct or indirect impacts would occur which are outlined within the **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**. These are detailed and

Reference number	Theme	Summary of matter raised	Response
			secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement of habitats. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. By creating species-rich grassland and arable margins along with scrub and tree planting within these buffers, this would create a coherent ecological network linking the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. Mitigation is detailed within and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142].** In its Relevant Representation **[RR-203]** Natural England has confirmed that: *"The Environmental Statement has fully considered impacts to the existing SSSIs as well as the proposed Bernwood SSSI as best it can, given the status of the proposed designation, which we welcome. The importance of the Bechstein's bat population, their sensitivity, and the potential impacts from the project have been appropriately characterized."*
RR-08, RR-14, RR-16, RR-21,	General	Comments that the Proposed Development	The full assessment is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Where

Reference number	Theme	Summary of matter raised	Response
RR-24, RR-30, RR-32, RR-34, RR-43, RR-47, RR-56, RR-58, RR-65, RR-68, RR-69, RR-83, RR-86, RR-88, RR-89, RR-91, RR-96, RR-103, RR-105, RR-106, RR-108, RR-110, RR-112, RR-113, RR-114, RR-116, RR-117, RR-118, RR-119, RR-120, RR-124, RR-125, RR-132, RR-133, RR-140, RR-141, RR-142, RR-143, RR-145, RR-155, RR-161, RR-166, RR-169, RR-176, RR-177, RR-178, RR-182, RR-187, RR-188, RR-189, RR-193, RR-194, RR-199, RR-209,		would affect local biodiversity.	required, mitigation measures are detailed and secured by **Outline LEMP [EN010158/APP/7.6] [APP-142]** is robust and sufficient to offset the impacts of the Proposed Development. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity.

Reference number	Theme	Summary of matter raised	Response
RR-215, RR-217, RR-220, RR-225, RR-226, RR-229, RR-230, RR-233, RR-235, RR-236, RR-238, RR-239, RR-243, RR-260, RR-274, RR-277, RR-281, RR-286, RR-289			
RR-08, RR-247	Great Crested Newt	Comment that there would be a negative effect on Great Crested Newt from the Proposed Development. Specific comments mentioned impact of increased construction traffic on known GCN crossing points at Orchard Way and Quainton Road.	The full assessment with regards Great Crested Newt (GCN) is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. Where required, mitigation measures are detailed and secured by **Outline LEMP [EN010158/APP/7.6]** [APP-142] which are robust and sufficient to offset the impacts of the Proposed Development. The assessment outlines that the Proposed Development would either make use of the local District Level GCN licence or another licence option – the licence being the derogation that allows the Proposed Development to proceed.
RR-01, RR-16, RR-36, RR-71, RR-84, RR-89, RR-141, RR-143,	Habitats	Comment that the Proposed Development would lead to the fragmentation of habitats	Given the sensitivity of the location, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention, creation and enhancement

Reference number	Theme	Summary of matter raised	Response
RR-160, RR-209, RR-215, RR-246, RR-247		and loss of habitat connectivity across the site. Specific comments raised potential loss of flight lines for bats and birds, impact of fencing in impeding natural wildlife corridors for mammals.	of habitats along with appropriate buffers to maintain ecological connectivity. This includes field margins, woodland, hedgerows, trees, ponds, watercourses and ditches. Where key areas of bat activity, in particular *Myotis* activity have been identified, specific measures have been embedded into the design of the Proposed Development and solar PV modules have been removed from a number of fields, including: • Fields B17 and part of B9, located adjacent to the northern edge of Sheephouse Wood and connecting to hedgerows identified as a bat mitigation corridor between Sheephouse Wood, Shrub's Wood and Decoypond Wood. • Fields C1, C2 and C3, located between Sheephouse Wood and Greatsea Wood adjacent to the key Bechstein's bat commuting route identified by Natural England along the southern end of Three Points Lane. • Field D27, adjacent to the eastern edge of Runts Wood. • Fields D30 to D37 adjacent to the southern edge of Finemere Wood SSSI. • Perimeter fencing surrounding the Solar PV would be at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21, where higher levels of *Myotis* activity were recorded.

Reference number	Theme	Summary of matter raised	Response
			• Perimeter fencing surrounding the Solar PV would be offset at least 15m either side from centre line of existing hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, providing a 15m wide corridor link either side of each hedgerow creating a substantial linear feature at least 30m wide between Sheephouse Wood, Shrubs Wood and Decoypond Wood. • Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood. These areas would provide mitigation for bats including increased foraging resources, woodland edge habitat and connectivity. The creation of a mosaic of species-rich neutral grassland and scrub along field margins would improve connectivity across the Site to the wider landscape, reducing fragmentation and provide commuting habitat for bats. The full assessment is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Where required, mitigation measures are detailed and secured by **Outline LEMP [EN010158/APP/7.6] [APP-142].**

Reference number	Theme	Summary of matter raised	Response
RR-01, RR-03, RR-06, RR-08, RR-16, RR-29, RR-30, RR-36, RR-41, RR-43, RR-68, RR-71, RR-83, RR-84, RR-88, RR-89, RR-91, RR-96, RR-105, RR-115, RR-119, RR-128, RR-132, RR-138, RR-155, RR-160, RR-166, RR-168, RR-176, RR-178, RR-188, RR-209, RR-215, RR-217, RR-247, RR-248, RR-277, RR-288	Habitat loss	Comment that the Proposed Development would result in the loss of habitat.	The Proposed Development has been designed to ensure the retention and protection of all 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. Extensive areas of grassland creation and enhancement are proposed along with extensive planting of new hedgerows and enhancement of retained hedgerows, creation of arable margins, restoration of defunct ponds and creation of new ponds and scrub and tree planting. The full assessment is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Where required, mitigation measures are detailed and secured by **Outline LEMP [EN010158/APP/7.6] [APP-142]** which are robust and sufficient to offset the impacts of the Proposed Development. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** shows that the Proposed Development would have a significant positive net gain for biodiversity, well above the minimum 10%

Reference number	Theme	Summary of matter raised	Response
			requirement outlined by the Environment Act. The delivery of a minimum 40% net gain for habitat area, 17% for hedgerow and 10% for watercourses is secured via Requirement 7 of the Draft DCO [**EN010158/APP/3.1.2**] [**AS-010**] and therefore would be a legal requirement.
RR-58, RR-176	Heat island effect	Comment that there would be an impact on the micro-environment for plants and insects due to heat island effect.	Solar PV panels do get hot when in direct sun, but do not have the thermal mass in order to retain heat after direct solar radiation stops and quickly cool down. In the Applicant's experience, the newer bifacial glass / glass panels block some but not all the sunlight, unlike the older monofacial with a back sheet, this in turn creates a shaded, slightly cooler microclimate with less water evaporation where grass can thrive. The proposed vegetation underneath and around the Solar PV has been designed to incorporate a range of legume species of value to pollinators and other invertebrate species. It is proposed to graze under Solar PV areas with sheep, to help maintain floristic diversity as well as the droppings which would further benefit some species of invertebrates. This, coupled with the suite of mitigation measures outlined in **Outline LEMP [EN010158/APP/7.6]** [**APP-142**], has been specifically designed to benefit invertebrate species and bat prey.

Reference number	Theme	Summary of matter raised	Response
RR-29, RR-96, RR-188, RR-209	Hedgerows	Comment that there would be a negative effect on hedgerows from the Proposed Development.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** indicates the majority of hedges within the Order Limits would be retained (96.21%), with up to 2km needing removal to accommodate access and/or cable route. However, of this loss approximately 750m of hedgerow would be re-instated on completion of construction works and approximately 4,336 linear metres of new structural hedgerows would be planted, secured via the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. Measures secured via the **Outline LEMP [EN010158/APP/7.6] [APP-142]** already commit to a minimum 10m buffer between the security fence and hedgerows with an additional 5m from Solar PV to the security fence, which would be maintained as dark corridors and managed to promote semi natural habitat of value to foraging bats. As stated in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** strategic planting of hedgerows and tree belts (including replacement hedgerow planting along Three Points Lane), and improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' is proposed. This strategic planting would improve foraging and commuting habitat for bats between woodland blocks and improve connectivity across the Site and to the wider landscape; compensate for hedgerows lost; improve retained hedgerows; and improve roosting habitat for bats.

Reference number	Theme	Summary of matter raised	Response
RR-188	Impact of construction	Comment that the impact of construction would take a long time to remediate. Specific reference to hedgerow loss, soil disruption and replanting.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** secured via the **Outline LEMP [EN010158/APP/7.6] [APP-142]** discusses how the Applicant is committed to early planting in advance of construction works commencing where appropriate. It is acknowledged that new hedgerow planting would take some time to fully establish (perhaps 10 years) but this certainly does not equate to permanent loss. Any gaps would be kept to a minimum and where possible gaps would be reinstated. Approximately 750m of hedgerow would be re-instated on completion of construction works approximately 4,336 linear metres of new structural hedgerows would be planted, secured via the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and **Outline CEMP [EN010158/APP/7.2] [APP-138]** outline measures to ensure the maintenance of the linear nature of any gaps so that bats can continue to navigate along a linear feature until the reinstated hedgerows have had time to establish sufficiently. The **Outline Soil Management Plan [EN010158/APP/7.7] [APP-143]** outlines measures to ensure the management, protection and conservation of soil resources on Site and identifies best practice measures to maintain the physical properties of the soil.

Reference number	Theme	Summary of matter raised	Response
RR-71, RR-178	Invertebrates	Comment that there would be a negative effect on invertebrates from the Proposed Development, such as rare species of butterflies and bees.	Impacts on black and brown hairstreak butterflies and other terrestrial invertebrates are fully assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. Given that the Applicant is aware that both black and brown hairstreak butterflies are present and rely on blackthorn, and the presence of both species has therefore been assumed for the purposes of the assessments within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. In addition, the **Outline CEMP [EN010158/APP/7.2] [APP-138]** makes a commitment to survey all hedgerow sections to be removed for black and brown hairstreak species so that the sections containing overwintering eggs can be safeguarded. Appropriate survey work would be detailed in the detailed Construction Environmental Management Plan in consultation with relevant consultees. The habitat creation and enhancement measures outlined in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** are considered likely to benefit the invertebrate assemblages present. This includes new hedgerow and scrub planting (which would comprise a diversity of appropriate native species including Blackthorn (the food plant for black and brown hairstreak butterflies)), including hedgerows that would be planted pre-construction and enhancement of existing hedgerows by bolstering gaps with appropriate native species including Blackthorn where required. These measures are

Reference number	Theme	Summary of matter raised	Response
			detailed and secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**. The **Outline LEMP [EN010158/APP/7.6] [APP-142]** also includes for the creation and improvement of species-rich grassland, scrub, ponds, hedgerows, arable field margins and woodland, resulting in an increase of habitat suitable to support a diverse range of invertebrate species across the Site. The main potential effect of Solar PV on invertebrates cited in the available scientific literature relates to the lake effect concerned with light polarisation and the potential for aquatic invertebrates to mistake panels for water and die whilst laying their eggs on panels. However, it is important to note that modern Solar PV modules have anti-reflective coatings intended to minimise light polarisation and thereby reduce the type of effects that have been cited. In addition, fields proposed for Solar PV are broken up significantly by retained woodland and hedgerows and the associated buffers meaning that there is less potential for fauna to mistake the Proposed Development as a single large expanse of water. Well-designed and well-managed solar farms can significantly benefit invertebrates by providing valuable new habitats and food resources, especially in landscapes dominated by intensive agriculture. Studies have shown that solar farms with

Reference number	Theme	Summary of matter raised	Response
			biodiversity management plans have higher invertebrate abundance and species richness compared to traditional farmland.
RR-247	Local Wildlife Sites	Comment that there would be a negative effect on Local Wildlife Sites from the Proposed Development.	The Applicant is aware of the importance of these Local Wildlife Sites which are located adjacent to and within close proximity of the Proposed Development, as outlined and assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** The layout of the Proposed Development and embedded design principles have been designed to ensure the retention of these sites. For example, embedded design principles include a minimum standoff distance from Solar PV and associated infrastructure from these sites. Standard environmental protection measures during construction, operation (including maintenance) and decommissioning would be implemented to ensure no direct or indirect impacts would occur which are outlined within the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, **Outline SMP [EN010158/APP/7.7] [APP-143]**, **Outline Operational Environmental Management Plan [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**. These are detailed and secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018].**

Reference number	Theme	Summary of matter raised	Response
			Taking into account the proposed mitigation measures, there is not anticipated to be an adverse effect on the integrity of the Local Wildlife Sites.
RR-209	Management	Comment that there is a lack of enforcement measures or monitoring regimes to ensure biodiversity commitments are delivered.	A detailed monitoring strategy is outlined within the **Outline LEMP [EN010158/APP/7.6] [APP-142]** confirming that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV and associated infrastructure on bats. Additionally, the **Outline LEMP [EN010158/APP/7.6] [APP-142]** includes monitoring strategies for other protected species including birds. Further detail will be added into the **Outline LEMP [EN010158/APP/7.6] [APP-142]** and submitted at Deadline 1 to set out the methodology of the monitoring strategies. Further engagement is proposed with Natural England to discuss this in further detail. This would also confirm that the final monitoring programmes within the detailed Landscape and Ecological Management Plan would be submitted to and approved in writing by the relevant local planning authority in consultation with Natural England prior to the operational phase of the Proposed Development. The bat monitoring strategy would be developed in line with CIEEM's Bat Mitigation Guidelines (Chapter 9) to monitor the effectiveness of the mitigation proposed in relation to bats.

Reference number	Theme	Summary of matter raised	Response
RR-16, RR-43, RR-68	Mitigation	Comment that proposed mitigation measures are insufficient to mitigate effects on biodiversity and do not follow the requirements of the mitigation hierarchy.	Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] has fully justified how the mitigation hierarchy has been applied and recognised, and acknowledges the sensitivity of the local and wider environment. Along with retaining existing habitats wherever possible, the locations of proposed mitigation areas have been chosen to ensure connections between the existing SSSIs and ancient woodland adjacent to the Site would be enhanced by creating species-rich grassland, scrub planting and arable margins along with scrub and tree planting along with 93ha of fields that would be managed as open grassland. This would create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The creation of species-rich grassland would provide ground-nesting bird habitat and create a nectar source for invertebrates, which in turn provides a foraging resource for bats and bird species. A mosaic of scrub and grassland would improve foraging habitat for bats and provide habitat to support invertebrates. Restoration of defunct ponds would help to enhance the pond network in the area, provide additional bat foraging habitat and support great crested newts. In addition, these habitats would also be of benefit to species including invertebrates, amphibians, reptiles, non-ground nesting birds, roosting bats, badger and otter. These

Reference number	Theme	Summary of matter raised	Response
			measures are outlined and secured within the **Outline LEMP [EN010158/APP/7.6]** [APP-142].
RR-08	Otters	Comment that there would be a negative effect on otter from the Proposed Development.	No significant impacts to otters have been identified as a result of the Proposed Development as detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. The embedded mitigation secured by the **Outline LEMP [EN010158/APP/7.6]** [APP-142] includes a minimum standoff distance from Solar PV and associated infrastructure of 10m from ditches, ponds and ordinary watercourses and a minimum 20m offset from Claydon Brook in Fields E20, E11, E10 and north section of Field E21. Control measures to mitigate potential effects to otter, including potential disturbance from light, noise and vibration, and measures to mitigate degradation of habitats suitable to support otter are detailed within the **Outline CEMP [EN010158/APP/7.2]** [APP-138], **Outline SMP [EN010158/APP/7.7]** [APP-143], **Outline OEMP [EN010158/APP/7.3]** [APP-139] and **Outline DEMP [EN010158/APP/7.4]** [APP-140]. These are detailed and secured in the **Design Commitments [EN010158/APP/5.9.2]** [AS-018]. Pre-construction otter surveys would be undertaken to confirm any active holts, including further monitoring of resting places through the use of camera traps to determine use by otters, with appropriate buffers maintained to prevent disturbance.

Reference number	Theme	Summary of matter raised	Response
			Pre-construction surveys are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]** [APP-138]. The proposed mitigation measures are robust and sufficient to offset the impacts of the Proposed Development on otters.
RR-71, RR-110	Protected species	Comment that there would be a negative effect on protected species from the Proposed Development.	The full assessment for legally protected species is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050]. Where required, proposed mitigation measures detailed and secured by **Outline LEMP [EN010158/APP/7.6]** [APP-142] is robust and sufficient to offset the impacts of the Proposed Development. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2]** [APP-050] recognises that there is the *potential* for a significant adverse residual effect on Bechstein's bats. The limited evidence currently available broadly suggests that adverse effects may be felt by some bat species as a result of solar farm operation, although the exact nature and extent of these impacts is not yet clear. Therefore, while the embedded design and additional mitigation, including reinstatement of hedgerows and creation and/or improvement of foraging habitats and linear features, are considered to be effective means of minimising the impacts on Bechstein's bat, it is not possible, at this time, to definitively state that this mitigation would be fully efficacious and therefore residual impacts cannot be fully discounted.

Reference number	Theme	Summary of matter raised	Response
			Therefore, with due consideration to the status of the Bernwood Bechstein's bat population and the assessment of its National importance, a precautionary approach has been applied and the residual effects of the operation (including maintenance) of the Proposed Development are assessed as potentially being adverse, long-term and permanent for the duration of the operation (including maintenance) phase, in light of Bechstein's bat lifespans, and therefore potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would be of a scale that would not impact the overall favourable conservation status of the species as the design of the Proposed Development and proposed mitigation has focused on protecting and enhancing Bechstein's bat foraging and commuting habitat.
RR-209	Watercourses	Comment that there would be a negative effect on watercourses from the Proposed Development.	The full assessment for watercourses is presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]** and concludes that there would not be a significant adverse effect to watercourses, taking into account the proposed mitigation measures detailed within and secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline SMP [EN010158/APP/7.7] [APP-143]**, **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]**. These are detailed and

Reference number	Theme	Summary of matter raised	Response
			secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. The **Outline LEMP [EN010158/APP/7.6] [APP-142]** includes the commitment to a minimum10m offsets from all watercourses and waterbodies. Additionally, apart from the location for the bridge for Abnormal Indivisible Loads (AIL) there would be an offset at least 20m from the top of bank of Claydon Brook in Fields E20, E11, E10 and north section of E21 to all fence lines. It also includes measures to avoid herbicides, pollution, dust entering the watercourse and reducing water quality, for example, maintaining at least a 10m buffer from all ditches, ponds and watercourses. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4] [APP-103]** indicates a substantial net gain would be delivered by the Proposed Development above the minimum 10% requirement outlined by the Environment Act. The delivery of a minimum 10% for watercourses is secured via Requirement 7 of the DCO and therefore would be a legal requirement.
Climate			
RR-156	Approach to assessment	Comment about whether the mining, manufacture and transportation are	The mining, manufacture and transportation of components has been taken account as part of the Greenhouse Gas (GHG) Assessment. This assessment has been carried out in

Reference number	Theme	Summary of matter raised	Response
		taken into account, and whether using Cornish Lithium would decrease the environmental footprint.	accordance with Institute of Sustainability and Environmental Professionals (ISEP) and Royal Institution of Chartered Surveyors (RICS) guidance, assessing lifecycle emissions including 'A1-3 Product Stage' emissions, which includes raw material supply, transport and manufacturing, for all relevant components including 'the solar panels and battery units'. It is not possible to commit to specific procurement at this early stage; however, with the use of conservative assumptions **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** **[APP-051]** concludes the Proposed Development has an overall beneficial and significant effect on climate.
RR-68, RR-71	Approach to assessment	Comment that the loss of energy (heat) through importing and exporting to the BESS during operation has not been included in the carbon savings calculations.	Whilst there would be some transmission and distribution (T&D) losses with the transfer of energy between the BESS and the grid, these have not been quantified in this assessment. This is in line with the GHG Protocol, and the standard approach for assessing GHG emissions for solar and BESS developments, such as recently consented NSIP Stonestreet Green. The GHG Assessment in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** **[APP-051]** has quantified the GHG emissions associated with the operation (including maintenance) of the Proposed Development and generation of electricity, before any T&D losses.

Reference number	Theme	Summary of matter raised	Response
RR-68	Approach to assessment	Comment that the Applicant has assumed a lower rate of BESS cell replacement (1.5 sets) during operation compared to other local planning applications (3 sets) which should be explained.	Advancements in current BESS manufacturing have seen greater reliability with performance warranties in some cases extending to 17.5 years or above, resulting in a replacement rate of 1.5 sets across the service life of 40 years. This replacement rate is in line with other consented schemes such as Longfield Solar Farm and Stonestreet Green. The Applicant has collaborated with Tier 1 BESS manufacturers to ensure prospective BESS components could provide this durability.
RR-68	Approach to assessment	Comment that the predicted net savings for carbon emissions over the lifetime of the project are based on a comparison with emissions associated with CCGT generated electricity, and this is not appropriate for the BESS since this would be importing energy from low and high carbon-emitting sources.	Paragraph 8.8.17 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** [APP-051] contains justification for using comparison of the Combined Cycle Gas Turbine (CCGT) power plant as a method to determine the emissions savings of the exported electricity generated by the Proposed Development. BESS is energy shifting, rather than energy generation, and any GHG savings from the import, storage or export of energy from the BESS (which would have the equivalent or lower carbon footprint than the national grid) has not been taken into account in the GHG assessment as a conservative approach.
RR-242	Construction	Comment that there would be a large amount of carbon emitted during the	Emissions associated with the Proposed Development have been quantified in accordance with ISEP guidance, covering the construction, operation (including maintenance), and

Reference number	Theme	Summary of matter raised	Response
		construction phase of the Proposed Development.	decommissioning phases. **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]** concludes that the Proposed Development would result in an overall significant beneficial effect on the climate, even when emissions from construction are taken into account. Over its 40-year operational lifespan, the Proposed Development is expected to generate approximately 12,030,492 MWh of electricity. Total lifecycle emissions are estimated at 1,191,562 tCO_2e, with net greenhouse gas savings exceeding 3 million tCO_2e when compared with equivalent gas-fired electricity generation. Further details are provided in paragraph 8.10.2 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**.
RR-24, RR-29, RR-76, RR-89, RR-131, RR-135, RR-140, RR-143, RR-153, RR-156, RR-159	General	Comment that there would be a negative impact on the climate as a result of the Proposed Development and/or that the Proposed Development would not mitigate climate change.	As detailed in paragraph 8.11.2 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]** the Proposed Development is expected to generate approximately 12,030,492 MWh of electricity over its 40-year operational life, with total lifecycle emissions estimated at 1,191,562 tCO_2e. The Proposed Development would provide electricity to the national grid that may otherwise be generated by processes with higher carbon intensities. The climate benefit of the Proposed Development is therefore the replacement of electricity generation from fossil fuels, resulting in a reduction in greenhouse gas emissions and a contribution to climate change mitigation.

Reference number	Theme	Summary of matter raised	Response
			When compared with equivalent gas-fired electricity generation, this equates to net greenhouse gas savings in excess of 3 million tCO_2e, even when emissions related to construction and manufacturing are taken into account.
RR-17, RR-32, RR-33, RR-131, RR-135, RR-141, RR-156, RR-242, RR-255	Manufacturing and transportation	Comments that the carbon footprint of sourcing, manufacturing and transporting the different elements of the Proposed Development have not been taken into account.	The GHG assessment for the Proposed Development has been undertaken in accordance with ISEP and RICS guidance and includes consideration of lifecycle emissions, including A1–3 Product Stage emissions associated with the sourcing, manufacturing and transport of materials. Product Stage emissions have been assessed for all relevant components of the Proposed Development. The assessment methodology is set out in Section 8.6 (Approach to the assessment) of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, specifically paragraphs 8.6.9 and 8.6.31. Accordingly, the carbon footprint associated with the sourcing, manufacturing and transport of the Proposed Development has been fully accounted for within the GHG assessment.
RR-242	Operation	Comment that there would be a large amount of carbon emitted during the operational (including maintenance) phase of	As detailed in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, emissions associated with the operational (including maintenance) phase of the Proposed Development have been quantified in accordance with ISEP and RICS guidance, including Category B2

Reference number	Theme	Summary of matter raised	Response
		the Proposed Development.	operational and maintenance emissions, which total 6,423 tCO_2e. Total estimated operational GHG emissions over the lifetime of the Proposed Development are 462,996 tCO_2e, with the majority (approximately 89%) arising from the replacement of the BESS. Operational emissions represent approximately 39% of the total lifecycle emissions of the Proposed Development. When considered in the context of the full lifecycle assessment, the Proposed Development is expected to generate approximately 12,030,492 MWh of electricity over its 40-year operational lifespan. Total lifecycle emissions are estimated at 1,191,562 tCO_2e. When compared with equivalent gas-fired electricity generation, the Proposed Development would deliver net greenhouse gas savings in excess of 3 million tCO_2e. Although emissions would arise during the operational and maintenance phase of the Proposed Development, these are substantially outweighed by the emissions savings associated with the displacement of fossil-fuel-derived electricity. Accordingly, the assessment concludes that the Proposed Development would result in an overall significant beneficial effect on the climate.

Reference number	Theme	Summary of matter raised	Response
Community benefit			
RR-240	Compensation	Request for compensation	National Planning Practice Guidance advises that in general, planning is concerned with land use in the public interest. As a result of this, the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be considered as a material planning consideration and is not a matter for assessment under the EIA Regulations 2017. An assessment of the effects of development on property value was therefore not required as part of the Environmental Impact Assessment for the Proposed Development. The Applicant can confirm, however, that the ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8] [APP-038]** and **Outline LEMP [EN010158/APP/7.6] [APP-142]**. No residential property would experience a visual effect which would be so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential

Reference number	Theme	Summary of matter raised	Response
			properties from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport. Visual amenity aside, Part 1 of The Land Compensation Act 1973 makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects (including noise, smoke and fumes, but not including loss of value due to a diminished view or visual impact) of the use of development works such as this.
RR-131, RR-135	Cost of energy	Comments that energy prices would be negatively affected by the Proposed Development.	Electricity from the Proposed Development would feed into the National Grid, forming part of the national electricity supply that powers homes and businesses across the UK. By generating low carbon electricity at a low marginal cost, large-scale solar power reduces the energy generated by more expensive and more carbon intensive forms of generation. Solar therefore helps to decarbonises the electricity system and lower the market price of electricity, as set out in the **Statement of Need [EN010158/APP/5.6]** [APP-036].
RR-135	Electricity discounts	Query how the Proposed Development would contribute to the government's plans to deliver a Bill Discount	The Applicant is committed to delivering community benefits, energy bill discounts schemes and shared ownership if these are mandated. It is (through EDF power solutions) fully engaged with the ongoing consultation through the Planning and Infrastructure Act around these potential solutions with

Reference number	Theme	Summary of matter raised	Response
		Scheme through the Planning and Infrastructure Bill which ensures communities directly benefit from clean energy infrastructure.	DESNZ and will always seek to operate in line with (if not exceed) benefit levels that are given and industry guidance and not mandated. By generating low carbon electricity at a low marginal cost, large-scale solar power reduces the energy generated by more expensive and more carbon intensive forms of generation. Solar therefore helps to decarbonise the electricity system and lower the market price of electricity, as set out in the **Statement of Need [EN010158/APP/5.6] [APP-036]**.
RR-16, RR-29, RR-89, RR-190, RR-209	Energy	Comment that local residents would not benefit from the energy generated by the Proposed Development.	Electricity from the Proposed Development would feed into the National Grid, forming part of the national electricity supply that powers homes and businesses across the UK. By generating low carbon electricity at a low marginal cost, large-scale solar power reduces the energy generated by more expensive and more carbon intensive forms of generation. Solar therefore helps to decarbonises the electricity system and lower the market price of electricity, as set out in the **Statement of Need [EN010158/APP/5.6] [APP-036]**.
Connecting to the grid			
RR-68	Capacity	Comment that the downgrading of capacity	As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**, the Applicant has a grid connection agreement with NESO to import and export

Reference number	Theme	Summary of matter raised	Response
		from 500MW to 335MW has not been justified.	500MW (AC) of clean power, which has been requested to be reduced to 335MW (AC). It is expected that the grid connection agreement will be updated by NESO, to reflect this by Q3 2026. The Applicant requested this reduction as the iterative changes to the Proposed Development, which included large reductions in the developable areas due to environmental considerations and community feedback, meant that the 500MW export capacity would not likely be met.
RR-01, RR-32, RR-68, RR-71, RR-92, RR-135, RR-160, RR-170, RR-190, RR-205, RR-210	Connection	Comment that the replacement East Claydon Substation will not be ready for connections until 2032 which affects the viability of the Proposed Development and will not help meet the government's clean power targets for 2030.	As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** the Applicant has secured a grid connection agreement with NESO, with a grid connection date of Q4 2031, although there is the potential that an earlier connection could be achieved. Beyond 2030, solar generation will continue to be necessary to make an important contribution to the UK's renewable energy generating capacity towards 2050. The Applicant is aware that National Grid Electricity Transmission (NGET) are pursuing works to deliver a replacement substation as the existing substation (built in the 1960s) is coming to the end of its natural life. The final location and timing of the works have not been confirmed by NGET at this stage and so the Proposed Development

Reference number	Theme	Summary of matter raised	Response
			includes flexibility to account for the connection into NGET's infrastructure.
Construction			
RR-05	Amenity	Comment that construction activity would affect residential amenity.	Please refer to the **Outline CTMP [EN010158/APP/7.5] [APP-141]** for further details around mitigation for residential amenity impacts during the construction phase, including footpaths, greenspaces, traffic and co-ordination with other schemes in the area. The **Outline Rights of Way and Access Strategy (RoWAS) [EN010158/APP/7.8] [APP-144]** also set out considered mitigation against the impacts to the existing PROW network.
RR-188	Cabling	Comment about the construction of cabling potentially breaking up the continuity of the countryside and open space.	As described in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]**, the Grid Connection Cabling Corridor working width would be up to 25m to account for the inclusion of the cables, a two-lane haul road for construction access, space for temporary storage of topsoil and subsoil and working space between these features. It is anticipated that the working widths for the Interconnecting Cabling Corridor(s) between Parcels 1 and 2 would be up to 25m in width and up to 50m in width between Parcels 2 and 3. However, as secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**, the Interconnecting Cable Corridor(s) would have a maximum width of 1.5m for single cable circuits and 35m for multiple

Reference number	Theme	Summary of matter raised	Response
			cable circuits, while the Grid Connection Cable Corridor would have a maximum width of 6m. The overall widths of cabling and associated trenches would be confirmed at the detailed design stage, should the DCO has be granted. This is to allow flexibility in the final routing of the Interconnecting Cabling Corridor(s) and Grid Connection Cabling Corridor to respond to factors such as the detailed design of the Solar PV areas, pre-construction surveys and the final location and design of the new National Grid East Claydon Substation. The corridors would therefore not be as extensive as the indicative areas indicated on the **Works Plans [EN010158/APP/2.3.2] [AS-006]**. As set out in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, the Interconnecting Cable Corridor(s) and Grid Connection Cable Corridor are expected to use both open trench and horizontal directional drilling (HDD) installation techniques. Open trench is expected to be used for the majority of the corridor installation, e.g. through open fields. Either open trench or HDD would be used for corridor crossings of roads, environmental receptors (including water courses and ditches) and other existing below ground utilities infrastructure. As secured by the **Outline LEMP [EN010158/APP/7.6] [APP-142]**, vegetation removed for the Interconnecting Cable Corridor(s) and Grid Connection Cable Corridor would be reinstated as soon as reasonably

Reference number	Theme	Summary of matter raised	Response
			practicable post construction, with hedgerows reinstated as close to their existing alignment as possible.
RR-145	Construction workers	Concern that there is a lack of local infrastructure available to cope with the influx of workers associated with the proposed development.	A Staff Travel Plan would be developed into the detailed Construction Traffic Management Plan at the discharge of requirements phase (post-consent, should the DCO be granted). This would set out the management of the arrival and departure of staff on-site and encourage sustainable modes of transport such as car sharing. A staff mini bus is proposed with pickups from mainline rail stations to reduce the number of vehicles on the road. Car parking management would be implemented, and the Plan would be developed to reduce the number of single occupancy journeys to and from site during construction. This Plan would be a contractual requirement and is secured within the **Outline Construction Traffic Management Plan [EN010158/APP/7.5] [APP-141]**. For more information about the contents of the Staff Travel Plan please refer to section 4.9 of the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. The scale of influx of non-local workers has been estimated within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** at a peak of 36 workers, based on the scale and peripatetic nature of the construction workforce, and regional averages for the proportion of workers staying away from their permanent home at any given time in the South East.

Reference number	Theme	Summary of matter raised	Response
			All of these workers are likely to stay in tourist sector accommodation, and return home between working patterns, and therefore would not result in a significant net additional contribution to public service demand (for which they would already contribute to in part through general taxation).
RR-38, RR-67, RR-131, RR-148, RR-190, RR-193	Damage to private property	Comments that construction of other major projects in the area has caused damage to residential properties and vehicles, and vibration and road damage from construction works and traffic associated with the Proposed Development could further damage private property.	The route to the construction site is set out in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]. This route avoids construction traffic passing in close proximity to properties with roadside access and as such, the potential for vibration damage is not considered likely. An assessment of vibration has been undertaken as detailed in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** [APP-056] which concludes that vibration would be low and not significant due to the embedded setback distances to the Proposed Development from sensitive receptors that are secured within the **Design Commitments [EN010158/APP/5.9.2]** [AS-018]**.**
RR-116, RR-176, RR-209	Debris	Comment that the construction phase would cause mud and debris to be tracked into the local area.	Throughout construction, good housekeeping would be adopted on-site and the appointed contractor would implement the measures outlined in the **Outline CEMP [EN010158/APP/7.2]** [APP-138]**.** This would include keeping the site clean and tidy, ensure no wind-blown debris leaves the site, frequent cleaning of the wheel washing facilities and keeping temporary access routes clean from site derived

Reference number	Theme	Summary of matter raised	Response
			materials. Entrances into site would be kept free from mud and debris by using a road sweeper regularly to keep the site clean. In addition to this, the Considerate Constructors Scheme (CCS) would be adopted to assist in reducing pollution and nuisance from the Proposed Development, by employing good practice measures that go beyond statutory compliance.
RR-145	Effects on ecology	Comment that lanes proposed for construction access are ecologically important and would be negatively affected during the construction phase.	Lanes within the Order Limits that would be used for construction have been surveyed (see **ES Volume 4, Appendix 7.1: Preliminary Ecological Appraisal (2022) (Confidential) [EN010158/APP/6.4] [APP-087]** and any potential impacts that could occur have been appropriately assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050].** Where required, mitigation to protect habits and species associated with these areas have been detailed within and secured by the **Outline CEMP [EN010158/APP/7.2] [APP-138].**
RR-67, RR-68, RR-71, RR-96, RR-140, RR-142, RR-190, RR-207, RR-217, RR-220, RR-225, RR-254, RR-258, RR-262	General – disruption	Comment that there already has been significant disruption in the local area due the construction of other major projects, and an extension of this is unreasonable.	It is recognized that the local area is being affected by several large infrastructure projects. A series of mitigation measures and management plans have been produced for the Proposed Development to minimise the disturbance to the local area. The construction traffic associated with the Proposed Development would result in temporary increases on the local road network. A series of mitigation measures and management plans have been proposed to offset the impacts

Reference number	Theme	Summary of matter raised	Response
			of the construction, operational and decommissioning phase traffic flows as detailed in the **Outline CTMP [EN010158/APP/7.5]** [APP-141]. No link capacity issues are expected on any of the roads assessed due to the additional movements associated with the Proposed Development and other developments within the local area, as assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060].
RR-140, RR-145, RR-176	General – disruption	Comment that the construction of the Proposed Development would ruin the tranquillity of the countryside.	The Applicant has developed the design of the Proposed Development to provide a sensitive response to the local environment and reduce potential effects during the construction phase in accordance with the Project Principles set out in the **Design Approach Document [EN010158/APP/5.8]** [APP-038]. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] presents an assessment of effects on landscape character and visual amenity. The assessment acknowledges that some significant effects on landscape character would be experienced during the duration of the operation phase of the Proposed Development. However, the significant landscape and visual effects of the Proposed Development would be largely reversible following decommissioning. While changes cannot be fully mitigated, the design includes embedded planting to reduce visibility where possible, while

Reference number	Theme	Summary of matter raised	Response
			additional measures include the adoption of the **Outline CEMP [EN010158/APP/7.2] [APP-138], Outline OEMP [EN010158/APP/7.3] [APP-139]**, **Outline DEMP [EN010158/APP/7.4] [APP-140]**, **Outline CTMP [EN010158/APP/7.5] [APP-141] and Outline LEMP [EN010158/APP/7.6] [APP-142]**. The construction traffic associated with the Proposed Development would result in temporary increases on the local road network. A series of mitigation measures and management plans have been proposed to offset the impacts of the construction traffic flows as detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. No link capacity issues are expected on any of the roads assessed due to the additional movements associated with the Proposed Development.
RR-30, RR-110, RR-126, RR-135, RR-189	Lighting	Comment that lighting used during the construction phase would negatively affect local residents.	There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** and the **Outline CEMP [EN010158/APP/7.2] [APP-138].** Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction

Reference number	Theme	Summary of matter raised	Response
			and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting.
RR-247	Orchard Way	Comment that the proximity of the Proposed Development to Orchard Way would affect residents of this road during construction.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** identifies the construction traffic access route. Orchard Way would not be used for access to the Site. Access between parcels would be taken via internal access tracks, rather than public roads. Throughout construction, good housekeeping would be adopted on-site and the appointed contractor would implement the recommendations as outlined in the **Outline CEMP [EN010158/APP/7.2] [APP-138].** This would include keeping the site clean and tidy, ensuring no wind-blown debris leaves the Site, frequently cleaning the wheel washing facilities and keeping temporary access routes clean from site derived materials. Entrances into site would be kept free from mud and debris by using a road sweeper regularly to keep the site clean. In addition to this, the Considerate Constructors Scheme (CCS) would be adopted to assist in reducing pollution and nuisance from the Proposed Development, by employing good practice measures that go beyond statutory compliance.
RR-283	Procurement	Comment that most of the construction workers will	The Applicant would promote opportunities for local people to gain construction jobs and skills development opportunities; particularly those closest to the site, but also across Buckinghamshire. The **Outline Employment, Skills and**

Reference number	Theme	Summary of matter raised	Response
		not be from the local area or the UK.	**Supply Chain Plan (ESSCP) [EN010158/APP/7.14] [APP-150]** describes the approach. A clear communications campaign would inform local residents who are in education, unemployed and in work, about jobs and skills opportunities, using local networks and communications media, but significantly via a Working Group of stakeholders with a role in accessing people into work and skills development including Jobcentre Plus, local colleges, the Bucks Skills Hub, public and private sector training providers and voluntary and community sector organisations with a good reach into communities. A practical system of outreach and jobs brokerage would create pathways into work experience placements, entry level jobs and opportunities for those with higher level skills. The Applicant would also deliver within local Further Education Colleges, its well-established 'Destination Renewables' programme, which provides a comprehensive introduction for young people, aged 16 – 18 to the opportunities that a career in renewables can open. The Applicant is already sponsoring the 2025/6 activities of the Bucks Business Forum and the Bucks Skills Hub and would attend job fairs including the March 2026 Buck's Skills Fair, careers days in schools and colleges and other jobs and careers awareness events, taking opportunities to promote, as

Reference number	Theme	Summary of matter raised	Response
			early as possible, jobs and training opportunities on the Proposed Development and in renewables generally. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** sets out the construction employment estimates for the Proposed Development. Throughout the 30-month construction phase, approximately 600 workers may be needed on-site. Applying additionality assumptions and Construction Industry Training Board survey data on how far construction workers in the South East travel to work and how many usually stay away from home, it is estimated that: • approximately 420 to 470 (up to 78%) Full Time Equivalent (FTE) construction workers per year would live within a radius of up to 50 miles from the Proposed Development; and • approximately 180 (30%) FTEs per year would live within 10 miles of the Proposed Development. It is anticipated that 36 workers (6%) would move temporarily to the area to seek tourist accommodation while working on the Proposed Development, which is a normal factor in civil construction projects. While some workers may not be from the UK, all workers employed on the Proposed Development would have the legal right, ability and entitlement to work in the UK.

Reference number	Theme	Summary of matter raised	Response
RR-156	Procurement	Comment that the Proposed Development should make use of the Trelavour Lithium Project in Cornwall to keep benefits in the UK.	The Applicant thanks the community for this comment and will note the project in question to ensure any potential future suppliers are aware of it.
RR-255	Procurement	Comment that sourcing elements of the Proposed Development from other countries will make us more dependent on other countries and susceptible to foreign interference.	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to address climate change and energy security. While the procurement process for the Proposed Development has not yet begun, the Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used for the Proposed Development. In order to deliver as much local economic benefit from the Proposed Development as possible, Theme 3 of the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14] [APP-150]** describes how the Applicant would work with local organisations with good connections to businesses, to raise awareness of contracting opportunities and open up the supply chain to local companies.
RR-11, RR-30, RR-83, RR-125, RR-126, RR-135,	Working hours	Comment that the proposed working hours are too long and too many	The normal (core) working hours are proposed to be 7am-7pm Mondays to Fridays and 7am to 12pm Saturdays. Between 7am-8am and 6pm to 7pm noisier activities would be

Reference number	Theme	Summary of matter raised	Response
RR-140, RR-142, RR-145,RR-147, RR-151, RR-152, RR-162, RR-164, RR-174, RR-188, RR-205, RR-216, RR-249, RR-254, RR-261, RR-264, RR-265, RR-278, RR-280		working days are proposed. Specific comments highlighted that proposed hours may affect commuters travelling to work.	restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. Staff movements would be on-site prior to network peak which is generally when commuter traffic is at its heaviest. Staff travel movements would be minimised wherever possible through a Staff Travel Plan which is secured in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**. **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** sets out the traffic impacts across the study area road network. No significant effects are predicted on commuter routes, including the A41. The **Outline CTMP [EN010158/APP/7.5] [APP-141]** includes provision for the Principal Contractor to liaise with the host authority to prepare a diary of local community events. Where possible, HGV traffic flows would avoid moving on these days.
Consultation			
RR-160, RR-219	Consultation materials	Comment that the information presented at consultation events was not sufficient.	The Applicant respectfully disagrees with this comment. The five public events held during the Phase Two Consultation period comprised 14 information boards, with large-scale copies of the updated layout of the Proposed Development and photomontages. Copies of the layout presented at Phase One Consultation were available to explain changes to the design that had been

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			made. Copies of the Statement of Community Consultation and Preliminary Environmental Information Report (PEIR) were available to inspect, with copies of the consultation booklet and questionnaire available to be taken away. A digital 3D model was also available at the public events and showed indicative visualisations of the Proposed Development. The 3D model was operated by a company specialising in 3D modelling using a computer and television monitor, with attendees able to request to see indicative visualisations of the solar panels from different locations. It also showed how planting could be utilised to screen areas of the Proposed Development and the existing baseline, as well as the preferred location of the battery storage and Rosefield Substation. The Applicant also ensured that specialist members of the project team were available at the public events to provide further information and answer questions about the Proposed Development, including transport, landscape and visual, and ecology specialists. More information about how the Applicant carried out its Phase Two Consultation can be found in Chapter 5 of the **Consultation Report [EN010158/APP/5.1]** [APP-020].
RR-247	Consultation zone	Comment that there has been no consultation with	The Applicant respectfully disagrees with this comment. As shown in Figures 2-1 and 5-3 within the **Consultation Report [EN010158/APP/5.1]** [APP-020], properties on Orchard Way

Reference number	Theme	Summary of matter raised	Response
		the residents of Orchard Way.	were included in the inner consultation zone for both Phase One and Phase Two consultations.
RR-96	Optionality	Comment that the consultation is flawed because the location of the East Claydon replacement substation is not yet known.	The Applicant included informationGrid and proposed replacement National Grid East Claydon Substation as part of its Phase Two Consultation, noting that this was being progressed separately by National Grid, and does not form part of the Proposed Development. National Grid published information about the proposed National Grid East Claydon Substation in early 2024. The Applicant explained the relationship between the Proposed Development and the proposed National Grid East Claydon Substation in its Phase Two Consultation materials – including the exhibition information boards, consultation booklet and PEIR (see **Consultation Report Appendices G-2 [EN010158/APP/5.2] [APP-026]** and **Appendix L-1 [EN010158/APP/5.2] [APP-031]**). At the public events, contact information for National Grid was available for anyone who wished to find out more about the proposed National Grid East Claydon Substation. More information about how the Proposed Development would connect into the National Grid is provided in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** .
RR-62, RR-102, RR-116, RR-211	Principle of consultation	Comment that the Applicant has disregarded	The Applicant respectfully disagrees with this statement. The Environmental Statement includes **ES Volume 2, Chapter 14:**

Reference number	Theme	Summary of matter raised	Response
		the negative impacts of the proposal on local people.	**Population [EN010158/APP/6.2] [APP-057]** which provides an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning of the Proposed Development upon population and socio-economics. The assessment has been informed by a robust environmental baseline, developed using 2021 Census data, alongside other relevant data sources including the ONS Annual Population Survey (2024), UK Business Counts (2023), English Indices of Multiple Deprivation (2019), ONS Estimates for Regional Gross Value Added (GVA) (2022), DFE Apprenticeships and Traineeships Data (2025), DEFRA data on the structure of the Agricultural Industry in England (2025) and Buckinghamshire Council Public Rights of Way data. Further, to understand the views of the local community and help shape plans for Proposed Development, the Applicant conducted a robust and thorough programme of pre-application consultation. This included two phases of formal consultation and a targeted consultation, alongside a programme of continuous stakeholder engagement spanning over 24 months. For more information about how the Applicant approached pre-application consultation and engagement and had regard

Reference number	Theme	Summary of matter raised	Response
			to the feedback received, see the **Consultation Report [EN010158/APP/5.1] [APP-020]**.
RR-71, RR-89, RR-95, RR-107, RR-137	Principle of consultation	Comment that the Applicant has overlooked and/or ignored concerns raised by the local community.	The Applicant respectfully disagrees with this statement. The Applicant approached pre-application consultation with a commitment to understanding the views of the local community in order to help shape plans for Proposed Development. Changes made in response to community feedback include moving the Order Limits away from Botolph Claydon, adding offsets from important local footpaths like Bernwood Jubilee Way, changing the proposed location of the Rosefield Substation and proposing new permissive pathways. This included two phases of formal consultation and a targeted consultation, alongside a programme of continuous stakeholder engagement. For more information about how the Applicant approached pre-application consultation and engagement and had regard to the feedback received, see the **Consultation Report [EN010158/APP/5.1] [APP-020]**.
Cultural heritage			
RR-220	Claydon House	Concerns around the proximity of the proposal to Claydon House	As set out more fully in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the design of the Proposed Development has evolved to consider potential effects on

Reference number	Theme	Summary of matter raised	Response
			Claydon House. The fields closest to the listed building and registered park and garden would be used for the internal access track and internal cable connection. The effect of these elements of the Proposed Development has been considered within **ES Chapter 9: Cultural Heritage [EN010158/APP/6.2]** [APP-052]. The Applicant concludes that there would be a low level of less than substantial harm to Claydon House, Historic England broadly concur with this assessment as noted in its **Relevant Representation** [RR-109].
RR-06, RR-67, RR-117, RR-190, RR-247	Conservation areas	Comments highlighting potential effects on the setting and amenity of the Botolph Claydon Conservation Area and East Claydon Conservation Area.	As set out more fully in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the design of the Proposed Development has evolved to consider views from Botolph Claydon and East Claydon. Four fields closest to the Botolph Claydon Conservation Area are no longer considered for solar following Phase One Consultation and following Phase Two Consultation these fields were removed from the Order Limits altogether. The closest part of the Order Limits is now approximately 175m from the Botolph Claydon Conservation Area. Following Phase One Consultation Fields D8, D9, D18 and D19 were no longer proposed as an option for the Rosefield Substation, to reduce potential visual effects for residents of Botolph Claydon, and a potential location for the BESS in Parcel 3 was reduced in size from the potential BESS location

Reference number	Theme	Summary of matter raised	Response
			indicated previously, to take account of landscape and visual assessments. In response to feedback received during the Phase Two Consultation, the BESS is no longer proposed in Field E23 of Parcel 3, in part relating to views from Botolph Claydon and East Claydon. These changes have ensured that visibility of the Proposed Development from Botolph Claydon Conservation Area are much reduced – and the LVIA concludes that the effect would be less than significant (**ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053]). The changes to the approach to the Botolph Claydon Conservation Area from the south and changes to the approaches to East Claydon village have been assessed within the detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106]), the harm to the significance of the Conservation Area was concluded to be less than substantial. Historic England concurred with this assessment as noted in its Relevant Representation **[RR-109]**. The harm to the significance of the non-designated East Claydon village is likewise concluded to be less than substantial.
RR-32, RR-117, RR-131, RR-215, RR-241	General – heritage value of the local area	General concern around impacts to the understanding of the	The Applicant has had regard to the historic character of the area in the design of the Proposed Development as set out within the **Design Approach Document [EN010158/APP/5.8]** [APP-038]. Where the historic rural character of the area contributes to the significance of individual heritage assets this

Reference number	Theme	Summary of matter raised	Response
		historic character of the local area.	is acknowledged within the stage 1 setting assessment (**Annex C** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106]). It is also acknowledged and considered within the detailed setting assessment (**Annex D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106])
RR-68, RR-71, RR-220, RR-247	Setting of heritage assets	Comment that the Proposed Development would affect the setting and enjoyment of listed buildings and non-designated heritage assets within the surrounding villages.	The Applicant has concluded that there would be less than substantial harm to the significance of the listed buildings and non-designated heritage assets within the surrounding villages (including as a result of changes in their setting). These effects are detailed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** [APP-052] and **Annex C** and **D** of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4]** [APP-106].
RR-68, RR-71	Setting of heritage assets	Comment that the Proposed Development would affect buried heritage assets. Specific reference to ridge and furrow fields which provide visible signs of the medieval agricultural	The impacts of the Proposed Development on buried heritage assets (archaeological remains) have been considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2]** [APP-052] and are concluded to be not significant following mitigation. Appropriate mitigation has been agreed with Buckinghamshire Council and Historic England for the Iron Age and Romano British remains within the footprint of the Rosefield Substation,

Reference number	Theme	Summary of matter raised	Response
		heritage and aid understanding of the historic role of agriculture in the local area, as well as East Claydon Medieval Earthworks, and former roman road.	Collector Compound and BESS which would be removed during construction of the Proposed Development. These mitigation measures are detailed within the **Draft Archaeological Management Strategy [EN010158/APP/7.10] [APP-146]**.This includes provisions for further investigation to inform the detailed design of the Proposed Development and appropriate mitigation for other remains within the Order Limits.
RR-29	Walking routes	Concerns around impacts to historic walking routes.	As set out more fully in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the design of the Proposed Development has evolved to consider views from local walking routes. Following Phase One consultation, Solar PV development was no longer proposed in Fields D1 and D3 (North) adjacent to Botolph Claydon and Fields D27, D30, D32, D33, D34, D35, D36 and D37 within the Quainton-Wing Hills Area of Attractive Landscape. A buffer to exclude Solar PV to the east of the Bernwood Jubilee Way (Fields D4, D11, D14 and D15) was also added to reduce impacts on footpath users. Further to this, larger site infrastructure, such as the BESS and the Rosefield Substation, were located to lower lying fields, and in the case of the latter, located close to the existing National Grid East Claydon Substation. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**, the Applicant acknowledges that significant adverse visual effects are likely

Reference number	Theme	Summary of matter raised	Response
			to occur for users of PRoW between Botolph Claydon and Runts Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runts Wood); PRoW between East Claydon Road and Parcel 3; and Swan's Way/Outer Aylesbury Ring while the Proposed Development is operational, whilst medium-term significant effects would be experienced to the Midshires Way/North Buckinghamshire Way.
Cumulative effects			
RR-45	Air quality	Comment that there would be cumulative impacts of multiple proposals in the area on increased dust.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** concludes that cumulative effects of dust are considered to be not significant, with appropriate mitigation measures in place at all sites. As per the Institute of Air Quality Management - Guidance on the assessment of dust from demolition and construction, construction dust impacts are relevant up to 250m from the Site boundary. There are five proposed developments and the National Grid East Claydon Substation within 250m of the Order Limits. All developments are expected to agree and follow detailed Construction Environmental Management Plans or Dust Management Plans and Decommissioning Environmental Management Plans that would adequately control dust emissions and construction/decommissioning

Reference number	Theme	Summary of matter raised	Response
			plant exhaust emissions during the construction and decommissioning phases.
RR-68, RR-96, RR-126, RR-137, RR-154	Approach to assessment	Comment that cumulative effects of all the proposed developments in the area have not been adequately assessed.	A detailed cumulative effects assessment has been undertaken for the purposes of the Environmental Statement as detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list. The criteria used to determine whether to include or exclude an existing development and/or approved development on the short list reflects the process established by the Planning Inspectorate's Advice on Cumulative Effects Assessment and has regard to relevant policy and guidance documents and consultation with the relevant statutory consultation bodies (particularly Buckinghamshire Council). The short list of other developments that have been assessed is detailed within Table 17.3 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.
RR-06, RR-68, RR-71, RR-80, RR-105, RR-110, RR-119, RR-132, RR-143, RR-145, RR-177, RR-189,	Biodiversity	Comment that there is a cumulative impact on biodiversity with other major projects in the local area, such as HS2 and East West Rail and the	Cumulative effects are assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. The species-specific cumulative effects are summarised below. Using the precautionary principle, there is anticipated to be a potential long term, adverse inter-project cumulative residual effect on Bechstein's bat due to the modification of habitat (installation of Solar PV modules) for the duration of the

Reference number	Theme	Summary of matter raised	Response
RR-193, RR-255, RR-286		National Grid East Claydon Substation.	operation (including maintenance) phase, with other developments located within the Bechstein's bat Core Sustenance Zone. This would be potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would be of a scale that would not impact on the overall favourable conservation status of the species, due to the Proposed Development design and mitigation focusing on protecting and enhancing Bechstein's bat foraging and commuting habitat. Although there would be a temporary adverse effect on ground nesting birds, non-ground nesting birds and wintering birds during the construction phase from habitat loss and disturbance, this would be short-term and temporary, at the Local level and not significant. The amount of habitat to be retained and improved is considered sufficient to support the existing ground nesting, non-ground nesting birds and wintering bird assemblages within the Order Limits and would also provide a significant, beneficial, long-term effect at the Local level for ground-nesting birds during the operation (including maintenance) phase. It is considered likely that birds would be able to use the improved habitat relatively quickly, once established, within the construction phase and through into the operation (including maintenance) phase. Therefore, any such inter- project cumulative effects are not considered to be significant.

Reference number	Theme	Summary of matter raised	Response
RR-188	Collaboration	Comment that developers in the local area will not coordinate to reduce effects on the local area.	The Applicant will continue to engage with stakeholders, including other major projects to help reduce potential impacts during the construction phase. An **Outline CTMP [EN010158/APP/7.5]** [APP-141] has been submitted as part of the Application, which has been informed and shaped by consultation and engagement. It also draws on experiences of other infrastructure projects to ensure that proposed measures are appropriate and efficient. This includes collaboration with other developments, with provision for the Principal Contractor to consult with the HS2 Transport Officer to coordinate haulage operations on the access routes during the construction period.
RR-68, RR-71	Cumulative effects	Comment that the volume of major projects proposed in the local area will cumulatively effect understanding of its historic character.	Cumulative effects on heritage assets have been considered within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060] which will be updated with any additional applications submitted during the examination. The cumulative effect on the landscape character is considered within **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4]** [APP-135]. This concludes that there would be significant effects to LCA 9.2 Quainton Hill only as a result of the Littleton Manor Farm (Application reference 22/03384/AOP) development in combination with the Proposed Development, and that the cumulative effect of

Reference number	Theme	Summary of matter raised	Response
			other developments would not be significant or would result in no greater effect than the Proposed Development alone.
RR-07, RR-11, RR-19, RR-116, RR-141, RR-143, RR-145	Fair share	Comment that the volume of projects in the area overextends the needs of the local area, with no benefit for local residents.	In December 2025, NESO published the high-level results of its connection queue re-prioritisation process. This has sought to prioritise projects for delivery to achieve the government's current capacity ranges. The Applicant has received confirmation that it has been included within the re-prioritised connections queue. The Proposed Development is therefore needed to contribute to meeting the current capacity ranges. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** highlights the wider benefits that the Proposed Development would bring to local communities in regards to employment, workforce spending and GVA/supply chain benefits, which are as follows: • 420 to 470 net additional FTE jobs per year of construction within the Construction Labour Market Area (CLMA), and 180 in the CLMA Focus Area; • £28.5m and £12.2m in the form of construction GVA within the CLMA and the CLMA Focus Area per year, respectively; • £1.9m on average per year in the form of construction workforce spending;

Reference number	Theme	Summary of matter raised	Response
			• 18 net additional operational FTE jobs within Buckinghamshire; and • £74,000 on average per year in the form of operational workforce spending. The **Planning Statement [EN010158/APP/5.7.2]** [AS-027] also highlights the wider benefits that the Proposed Development would bring to the local community and the economy, including: • proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of Public Rights of Way (PRoWs); • the creation of three permissive paths; • a Community Benefit Fund reflecting £400 per megawatt per year from the start of operation and lasting throughout the operational lifetime of the Proposed Development; and • an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector, with a sum of £50,000 set to be allocated annually from the Date of Commencement until the Date of Decommissioning.
RR-68, RR-71, RR-80	Flood risk	Comment that the volume of major projects proposed in the local area	The potential for cumulative flood risk impacts from other projects in the area has been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060]. The Proposed Development (and other projects

Reference number	Theme	Summary of matter raised	Response
		will cumulatively effect flood risk.	considered in the cumulative assessment) would incorporate appropriate drainage and flood mitigation measures in accordance with policy and best practice, ensuring that surface water runoff rates and volumes do not exceed existing conditions. As such, the Proposed Development would not contribute to an increase in flood risk, either on-site or elsewhere, cumulatively or individually.
RR-06, RR-11, RR-13, RR-19, RR-21, RR-29, RR-30, RR-32, RR-35, RR-39, RR-42, RR-43, RR-44, RR-48, RR-52, RR-53, RR-55, RR-57, RR-59, RR-60, RR-62, RR-63, RR-64, RR-66, RR-68, RR-71, RR-73, RR-74, RR-80, RR-84, RR-86, RR-87, RR-89, RR-95, RR-96, RR-98, RR-106, RR-110,	General – cumulative effects	General concerns around the cumulative impacts of multiple developments in the region (HS2, East West Rail, Grendon Underwood prison expansion, Calvert incinerator, East Claydon substation, Statera BESS, smaller solar and BESS applications, etc.)	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail and Grendon Prison. The assessment presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** concludes that there are a number of likely significant inter-project residual cumulative effects on landscape and visual and biodiversity. These include a potential significant inter-project cumulative residual effect on Bechstein's bats with East Claydon BESS, East Claydon Greener Grid Park and Tuckey Solar Farm as they are anticipated to be displaced

Reference number	Theme	Summary of matter raised	Response
RR-116, RR-117, RR-119, RR-120, RR-127, RR-129, RR-132, RR-136, RR-137, RR-140, RR-141, RR-145, RR-146, RR-148, RR-153, RR-154, RR-156, RR-159, RR-161, RR-168, RR-171, RR-173, RR-181, RR-186, RR-189, RR-193, RR-197, RR-217, RR-225, RR-232, RR-235, RR-244, RR-248, RR-255, RR-260, RR-273, RR-277, RR-283, RR-284, RR-285, RR-288			from the Claydon Brook, which is considered to be significant at the Local level as the area lies outside of the Core Sustenance Zone. Depending on any collision risk for bats and trains, and the loss of foraging habitat, there is the potential for significant inter-project cumulative effects on bats with East West Rail. There is also potential for significant inter-project cumulative effects on foraging bats with Grendon Prison. The assessment has concluded significant inter-project cumulative effect on Local Character Area 5.7: Hogshaw Claylands and 7.3: Claydon Bowl, Bernwood Jubilee Way and PRoW between Botolph Claydon and Runt's Wood during the construction, operation (including maintenance) and decommissioning phases of the Proposed Development with East Claydon BESS, East Claydon Greener Grid Energy Park, Tuckey Solar Farm, East West Rail and Longbreach Solar Farm. There are significant inter-project cumulative effects anticipated on the North Buckinghamshire Way and the Midshires Way during the construction and decommissioning and at Year 1 of the operation (including maintenance) of the Proposed Development and significant inter project cumulative effects on Sion Hill Farm at both Year 1 and Year 10 of the operational (including maintenance) phase of the Proposed Development. There are also significant inter-project cumulative effects anticipated on the Swan's

Reference number	Theme	Summary of matter raised	Response
			Way/Outer Aylesbury Ring during the operational (including maintenance) phase of the Proposed Development. During the construction and at Year 1 of operation (including maintenance), there are anticipated to be significant inter-project cumulative effects on Granborough, PRoW between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road and PRoW between East Claydon/East Claydon Road from the Proposed Development and the East Claydon BESS development. A summary of the landscape and visual inter-project cumulative effects is detailed in Table 17.13 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]** [APP-060].
RR-09, RR-156	Landscape	Comment expressing concern about cumulative loss of countryside when taken alongside development around larger settlements such as Milton Keynes.	The Zone of Influence for the cumulative landscape assessment is set at 10km as presented in **ES Volume 3, Figure 17.1: Cumulative Zone of Influence [EN010158/APP/6.3]** [APP-075]. The short list of developments as presented in the **ES Volume 2, Chapter 17: Cumulative Effects [EN10158/APP/6.2]** [APP-060] included an urban extension at almost 10km to the south western edge of Milton Keynes, however it was considered too distant and well separated from the Proposed Development to result in likely significant cumulative effects. Those developments considered in the detailed cumulative landscape assessment are identified in the same Chapter 17. It is acknowledged by the Applicant that for one landscape receptor, LCA 9.2: Quainton Hill, effects would increase from not significant to

Reference number	Theme	Summary of matter raised	Response
			significant as a result of the combined cumulative effect with the Littleton Manor Farm development.
RR-05, RR-29, RR-39, RR-43, RR-44, RR-62, RR-66, RR-68, RR-71, RR-74, RR-84, RR-89, RR-98, RR-103, RR-110, RR-112, RR-119, RR-120, RR-131, RR-136, RR-137, RR-143, RR-156, RR-166, RR-177, RR-189, RR-209, RR-219, RR-221, RR-255	Landscape	Concerns around the cumulative impacts of multiple proposals in the area on the industrialisation of the landscape.	The Applicant recognises the concerns regarding landscape change but does not consider the term 'industrialisation' applicable to the Proposed Development. The cumulative effects on landscape character have been assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN10158/APP/6.2] [APP-060]** and as described above, would result in an increase in significance of effect for one Landscape Character Area, LCA 9.2: Quainton Hill. Other Landscape Character Areas that would experience increases in landscape effects are LCA 5.6 Claydon Valley and LCA 5.7: Hogshaw Claylands, however, effects would remain not significant. It is therefore acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale solar PV development as a result of the Proposed Development and that the extent of these effects would increase to a defined area within three Landscape Character Areas as a result of cumulative effects. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules and associated infrastructure, BESS and the Rosefield Substation into fields which are currently in

Reference number	Theme	Summary of matter raised	Response
			agricultural land use. The extent of manufactured structures introduced into the landscape would be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. Due to the changing topography across the Order Limits, the existing framework of woodlands, tree belts and hedgerows, combined with strategic gaps, the various developments would not often be viewed in combination with each other.
RR-43, RR-45, RR-145, RR-188	Noise	Comment that there will be a cumulative noise impact with other projects in the local area.	An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.The assessment concludes that the effects from noise and vibration are not significant following the adoption of appropriate mitigation measures.
RR-05, RR-30, RR-45, RR-68, RR-71, RR-106, RR-146, RR-153, RR-168, RR-193, RR-197, RR-219	Population	Comment that there is a cumulative impact of multiple proposals in the area on local communities.	An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** and identifies effects from each element of the ES (e.g. noise and vibration, air quality,

Reference number	Theme	Summary of matter raised	Response
			traffic and transport) on community-level receptors where there is an identified overlap in effects.
RR-110	Population	Comment that cumulative effects on the local landscape will impact on viability of the established visitor economy, with resulting loss of employment.	An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**, which includes consideration of the potential for cumulative effects on landscape and visual receptors, further considered in **ES Volume 2, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.2] [APP-135]**. This concludes that there is unlikely to be a significant cumulative effect on receptors that would have the potential to result in a change in the characteristics or tourist draw of the wider tourist economy.
RR-103, RR-218, RR-220, RR-255	Soils and agricultural land	Comment that there would be a cumulative loss of agricultural land from multiple projects in the area.	A cumulative assessment for soils and agriculture has been undertaken which considers projects within 1km from the Site as detailed in **ES Volume 2 Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**. No significant cumulative effect on agricultural land was found and, noting that only 1.51% of the Site is considered to be BMV land, further assessment was not considered necessary.

Reference number	Theme	Summary of matter raised	Response
RR-03, RR-29, RR-43, RR-45, RR-51, RR-67, RR-68, RR-71, RR-79, RR-80, RR-83, RR-103, RR-104, RR-120, RR-126, RR-131, RR-140, RR-141, RR-142, RR-143, RR-145, RR-148, RR-149, RR-154, RR-156, RR-166, RR-168, RR-171, RR-185, RR-188, RR-193, RR-198, RR-199, RR-212, 1RR-213, RR-219, RR-220, RR-221, RR-246, RR-247, RR-258, RR-264, RR-284, RR-285, RR-286	Transport and access	Comment that there will be a cumulative traffic impact as other major projects will overlap with the proposed construction phase of the Proposed Development. Specific comments raised concerns about resultant safety of roads for other users and pedestrians, congestion and road damage.	Cumulative traffic matters have been considered in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]. No significant cumulative effects are anticipated. Road safety has been considered in detail. The Proposed Development is not anticipated to increase road safety issues on the study area network. Further measures to assist with road safety are outlined in the **Outline CTMP [EN010158/APP/7.5]** [APP-141] which include measures for pedestrians and a road "Wear and Tear" agreement with Buckinghamshire Council.
RR-29, RR-38, RR-41, RR-43, RR-67, RR-68,	Transport and access	Comment that local communities have already dealt with traffic/	The **Outline CTMP [EN010158/APP/7.5]** [APP-141] sets out measures developed in consultation with local communities following experience from recent construction projects in the

Reference number	Theme	Summary of matter raised	Response
RR-71, RR-76, RR-79, RR-83, RR-93, RR-98, RR-116, RR-120, RR-126, RR-131, RR-132, RR-135, RR-138, RR-141, RR-145, RR-154, RR-166, RR-171, RR-181, RR-188, RR-199, RR-212, RR-214, RR-218, RR-219, RR-246, RR-247, RR-248, RR-281, RR-285, RR-286, RR-288		disruptions/ damage to local roads as a result of the construction of HS2, East West Rail and other developments in the area.	area and provides robust measures in direct response to those experiences.
Decommissioning			
RR-76	Classification of land	Concern that the land will become brownfield upon decommissioning and subsequently developed into housing	Following decommissioning of the Proposed Development, the Site would be reinstated in accordance with the **Outline DEMP [EN010158/APP/7.4] [APP-140]** and then would be returned to the landowner. It would not become brownfield and would still be considered a greenfield site, as established in case law.

Reference number	Theme	Summary of matter raised	Response
RR-43, RR-199	Disposal of elements	Comment that it is difficult to recycle many of the elements of the Proposed Development.	Solar PV modules are made up of several materials, including a metal frame, of which approximately 99% can currently be recycled. When decommissioning the Proposed Development, options to reuse or recycle materials available at the time would be explored to ensure that as much of the material as possible is recycled and diverted from landfills. More detail can be found in the **Outline DEMP [EN010158/APP/7.4] [APP-140]**.
RR-163	Disposal of elements	Comment that the Applicant has not considered recycling of solar panels.	The Applicant would recycle the Solar PV modules, of which approximately 99% can currently be recycled. This is detailed and secured in **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2] [APP-138]** which sets out the **Site Waste Management Plan**. This would form an outline for the purposes of the detailed Decommissioning Environmental Management Plan.
RR-188	General - disruption	Comment that there would be further disruption to the local community during the decommissioning process.	Environmental assessments detailed in **ES Volume 2, Chapter 6 – 16 [EN010158/APP/6.2] [APP-049 to APP-059]** consider and assess the impact of the decommissioning phase of the Proposed Development and this concludes that no significant effects are anticipated. As set out within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046],** the decommissioning phase is anticipated to take 24 months and during this period measures would be put in place to avoid and reduce impacts to the local community.

Reference number	Theme	Summary of matter raised	Response
			These are outlined and secured in the **Outline DEMP [EN010158/APP/7.4] [APP-140], Outline CTMP [EN010158/APP/7.5] [APP-141] and Outline SMP [EN010158/APP/7.7] [APP-143]**.
RR-06, RR-24, RR-33, RR-43, RR-68, RR-76, RR-85, RR-89, RR-113, RR-122, RR-132, RR-145, RR-176, RR-209, RR-234, RR-236	Remediation of land	Concern that the soil would be severely and/or irreversibly damaged upon decommissioning and would not be restored to its original use. Specific comments raise issue of compaction during decommissioning which would prevent the land being used for agriculture long after the Proposed Development is removed.	There would not be any significant effect on soil during decommissioning as outlined in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2] [APP-055]**. Soil mitigation measures to avoid damage to the soils and measures to restore the soil at decommissioning are outlined within the **Outline SMP [EN010158/APP/7.3] [APP-143]**. Industry standard guidance would be followed to ensure the soils are being protected and managed correctly. Any potential damage to the soil is reversible and temporary. During the operation of the Proposed Development the soils would have an opportunity to improve soil carbon sequestration and structure. During the operation the soil would not experience any agricultural pressure from cultivation, pesticides or fertilisers so therefore there would be an improvement of overall soil health during this phase. The **Outline SMP [EN010158/APP/7.3] [APP-143]** has specific measures to prevent compaction including use of track matting and low pressure vehicles and stripping of topsoil in dry friable conditions. Through proper use of the Soil Management Plan, no compaction issues are expected but if

Reference number	Theme	Summary of matter raised	Response
			compaction does occur amelioration would be used to restore the soil. The Proposed Development has committed in the **Outline Soil Management Plan [EN010158/APP/7.7] [APP-143]** to restoring the soils back to their original quality and would use a soil aftercare monitoring program post-decommissioning to ensure soil health and function is restored to its prior condition.
RR-06	Removal of panels	Concern that the panels would not be removed upon decommissioning.	The operational (including maintenance) phase of the Proposed Development is 40 years, which is controlled by a Requirement of the **Draft DCO [EN010158/APP/3.1.2] [AS-010]**. Following the operation (including maintenance) phase, the Proposed Development would require decommissioning. This would involve the removal of all the above ground infrastructure (including Solar PV panels) and any infrastructure up to a depth of 1m below ground level.
Design			
RR-68	Approach to design	Comment that the terms of reference for the Design Approach have not been met.	The **Design Approach Document [EN010158/APP/5.8] [APP-038]** sets out the context of the Site and how that has informed the approach to design. It identifies the opportunities and constraints of the Site, based on the outcomes of surveys and feedback from consultation, which have informed a series of Strategic and Project Principles for the design of the Proposed Development. The approach to the design and the

Reference number	Theme	Summary of matter raised	Response
			format of the **Design Approach Document [EN010158/APP/5.8] [APP-038]** follows the best practice guidance provided by the Planning Inspectorate in its Nationally Significant Infrastructure Projects: Advice on Good Design, with summaries of how the design complies at the end of each section. Section 6 of the **Design Approach Document [EN010158/APP/5.8] [APP-038]** clearly sets out how the design of the Proposed Development meets each of the Strategic and Project Principles.
RR-139	Approach to design	Comment that the Proposed Development is poorly designed.	The Applicant respectfully disagrees. The **Design Approach Document [EN010158/APP/5.8] [APP-038]** sets out the context of the Site and how that has informed the approach to design. It identifies the opportunities and constraints of the Site, based on the outcomes of surveys and feedback from consultation, which have informed a series of Strategic and Project Principles for the design of the Proposed Development. The approach to the design and the format of the **Design Approach Document [EN010158/APP/5.8] [APP-038]** follows the best practice guidance provided by the Planning Inspectorate in its Nationally Significant Infrastructure Projects: Advice on Good Design, with summaries of how the design complies at the end of each section. Section 6 of the **Design Approach Document [EN010158/APP/5.8] [APP-038]** clearly sets out how the

Reference number	Theme	Summary of matter raised	Response
			design of the Proposed Development meets each of the Strategic and Project Principles.
RR-156	Height	Comment that the height of the solar panels should be reduced.	The heights of all of the proposed infrastructure are outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. The Solar PV modules and mounting structures would be no greater than 3.5m above ground level, except within flood areas where the height would be no greater than 4.5m. The heights of the Solar PV modules are determined by the standardly available panel dimensions from commercial suppliers of Solar PV modules, allowing for a tilt of between 10 to 30 degrees from horizontal to optimise daylight absorption, as shown in **ES Volume 3, Figure 3.2: Indicative Solar PV and String Inverter Cross-Sections [EN010158/APP/6.3] [APP-063]**. The design of the Proposed Development has been informed by technical landscape and visual analysis. As set out in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**, alternative solar technologies such as Tracker Panels were discounted as a result of the landscape and visual impacts due to the increased height in comparison to fixed panels. Further detail on the landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual**

Reference number	Theme	Summary of matter raised	Response
			[EN010158/APP/6.2] [APP-053] and is supported by several figures presented in **ES Volume 3, Figure 10.1 – 10.26 [EN010158/APP/6.3] [APP-069]**, including Zone of Theoretical Visibility (ZTV) analysis to show the extent of visibility for Solar PV with and without proposed mitigation planting. The design also incorporates landscape planting to mitigate and screen views of the Solar PV. The landscape planting proposals are detailed and secured in the **Outline LEMP [EN010158/APP/7.6] [APP-142]**.
RR-96	Height	Comment that the height of supporting infrastructure (collector compounds, substation, fencing and CCTV) is too large.	The heights of all of the proposed infrastructure are outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** as no greater than: • 6m above ground level for the Main and Satellite Collector Compounds; • 15m above ground level for the Rosefield Substation; • 2.5m above ground level for deer-proof fencing (around Solar PV modules); and 2.75m above ground level for palisade or mesh fencing and 3.4m above ground level for pulse monitoring security fencing (all potential options around Rosefield Substation, BESS, Main and Satellite Collector Compounds); and

Reference number	Theme	Summary of matter raised	Response
			• 5m above ground level for the CCTV. As set out in the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**, a 'Rochdale Envelope' approach is being used in relation to the Proposed Development, whereby the maximum possible extent of each element of the Proposed Development is shown on the **Works Plans [EN010158/APP/2.3.2] [AS-006]**. It is not intended that the full extent of the envelope would be used for each element, rather that flexibility is retained to accommodate changes in technological advancements. In addition, the height parameters provided are maximums to accommodate the tallest equipment necessary. For example, within Rosefield Substation, buildings would have a maximum height of 7m and only the transformers, busbars and lightning surge arrestors would have heights of up to 15m. Further detail is provided in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]**. Further detail on the landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and is supported by several figures presented in **ES Volume 3, Figure 10.1 – 10.26 [EN010158/APP/6.3] [APP-069]**, including Zone of Theoretical Visibility (ZTV) analysis to show the extent of visibility for structures up to 6m and structures up to 15m with and without proposed mitigation planting.

Reference number	Theme	Summary of matter raised	Response
			The design also incorporates landscape planting to mitigate and screen views of the Solar PV modules. The landscape planting proposals are detailed and secured in the **Outline LEMP [EN010158/APP/7.6]** [APP-142].
RR-184, RR-190	Impact on villages	Comment that the Proposed Development surrounds the villages of Botolph Claydon and East Claydon.	As set out more fully in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the design of the Proposed Development has evolved to consider views from the Claydon villages and their settings. Four fields closest to the southern edge of Botolph Claydon were no longer considered for solar following Phase One Consultation and following Phase Two Consultation these fields were removed from the Order Limits altogether. Following Phase One Consultation, Fields D8, D9, D18 and D19 were no longer proposed as an option for the Rosefield Substation, to reduce potential visual effects for residents of Botolph Claydon, and a potential location for the BESS in Parcel 3 was reduced in size from the potential BESS location indicated previously, to take account of landscape and visual assessments. In response to feedback received during the Phase Two Consultation, the BESS is no longer proposed in Field E23 of Parcel 3, in part to address views from Botolph Claydon and East Claydon.
RR-03, RR-06, R-11, RR-30, RR-34 RR-37, RR-41, RR-43, RR-45,	Scale	Comment that the scale of the Proposed Development is too large	Solar development at scale is needed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to address climate change and energy security. Maximising the generating capacity of

Reference number	Theme	Summary of matter raised	Response
RR-47, RR-56, RR-58, RR-59, RR-60, RR-67, RR-84, RR-92, RR-93, RR-116, RR-117, RR-123, RR-132, RR-134, RR-138, RR-141, RR-177, RR-220, RR-236, RR-238, RR-242, RR-246, RR-248, RR-250, RR-259, RR-264, RR-271, RR-274, RR-277, RR-288		and requests for it to be reduced.	schemes improves their economic efficiency, bringing power to market at the lowest cost possible. The **Statement of Need [EN010158/APP/5.6]** [APP-036], provides further detail on the need and scale for the Proposed Development. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2]** [AS-027] sets out the reasoning for the Proposed Development, including its size and location. Following Phase Two Consultation, the design of the Proposed Development has been reviewed and revised to take account of stakeholder engagement, technical assessment and advice, and the outcomes of the Environmental Impact Assessment. This has included amendments to the Order Limits and potential areas for Solar PV development as set out with the **Design Approach Document [EN010158/APP/5.8]** [APP-038]. This resulted in an overall reduction of the Order Limits to 675ha (compared to 875ha at Phase One and 744ha at Phase Two).
RR-41	Topography	Comment that visibility of the Proposed Development is exacerbated due to its siting on a hill.	As set out in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the topography of the Site has influenced the design of the Proposed Development from the outset. Parcels 1 and 1a are identified as gently undulating with the highest point being Knowl Hill at around 116m above

Reference number	Theme	Summary of matter raised	Response
			ordnance datum (AOD). Parcel 2 is located on a low ridge crest that continues northeast towards Steeple Claydon and East Claydon, with a high point in the south of the Parcel at 137m AOD. Parcel 3 is located on relatively flat ground at 89-95m AOD. Within Parcel 1, proposed Solar PV was removed from land on top of Knowl Hill, to ensure Solar PV development would not be located on the highest and most visible area within Parcel 1. Within Parcel 2, fields in the south (Fields D27, D30, D32, D33, D34, D35, D36 and D37) were removed from consideration for Solar PV development due to the topography and visual considerations, which included reducing visibility within the AAL and from the wider landscape. In addition, elements of the Proposed Development such as the Rosefield Substation, BESS and the Main and Satellite Collector Compounds have been located to minimise their visual impacts, as set out in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**. Further detail on the landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and is supported by several figures presented in **ES Volume 3, Figures 10.1 – 10.26 [EN010158/APP/6.3] [APP-069]**, including Zone of Theoretical Visibility (ZTV) analysis to show the extent

Reference number	Theme	Summary of matter raised	Response
			visibility for Solar PV, structures up to 6m and structures up to 15m, with and without proposed mitigation planting.
RR-01, RR-36, RR-41, RR-46, RR-68, RR-160, RR-210	Topography	Comment that there are increased visual impacts of the Proposed Development resulting from the site's sloped topography	Sloping land is useful for solar generation, though there is flexibility within the fixed parameters to make adjustments at the detailed design stage to account for the topography e.g. the spacing between the rows of the solar PV panels to account for the angle of the sun. This flexibility is part of the optimisation of the site and contributes to the best use of land available. As set out with the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the topography of the Site has influenced the design of the Proposed Development from the outset. Parcels 1 and 1a are identified as gently undulating with the highest point being Knowl Hill at around 116m above ordnance datum (AOD). Parcel 2 is located on a low ridge crest that continues northeast towards Steeple Claydon and East Claydon, with a high point in the south of the Parcel at 137m AOD. Parcel 3 is located on relatively flat ground at 89-95m AOD. Within Parcel 1, proposed Solar PV was removed from land on top of Knowl Hill, to ensure Solar PV development would not be located on the highest and most visible area within Parcel 1. Within Parcel 2, fields in the south (Fields D27, D30, D32, D33, D34, D35, D36 and D37) were removed from consideration for Solar PV development due to the topography

Reference number	Theme	Summary of matter raised	Response
			and visual considerations, which included reducing visibility within the AAL and from the wider landscape. In addition, elements of the Proposed Development such as the Rosefield Substation, BESS and the Main and Satellite Collector Compounds have been located to minimise their visual impacts, as set out in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**. Further detail on the landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and is supported by several figures presented in **ES Volume 3, Figure 10.1 – 10.26 [EN010158/APP/6.3] [APP-069]**, including Zone of Theoretical Visibility (ZTV) analysis to show the extent visibility for Solar PV, structures up to 6m and structures up to 15m, with and without proposed mitigation planting.
Glint and glare			
RR-177, RR-214, RR-236, RR-238, RR-242, RR-246, RR-248, RR-250, RR-259, RR-264, RR-271, RR-274, RR-277, RR-288	Aviation	Comment that glint and glare from the Proposed Development could affect aircraft as it is under flight paths.	Glint and glare effects on flying paths have been considered in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]** with no significant adverse effects anticipated. This includes aircraft approaching aerodromes /airfields for landing. Departing aircraft are excluded as pilots would be looking up at the sky rather than at features on the ground. Planes flying at high altitude are also excluded as they would only receive low-impact reflections similar to natural elements such as lakes or the sea

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			and would not be focusing on features on the ground. The analyses confirm that there would be no significant adverse glint and glare effects on flight paths.
Health and wellbeing			
RR-30, RR-32, RR-35, RR-78, RR-82, RR-104, RR-115, RR-116, RR-141, RR-143, RR-145, RR-149, RR-166, RR-168, RR-182, RR-197, RR-218, RR-219, RR-220, RR-226, RR-242, RR-246, RR-250, RR-260, RR-262, RR-272, RR-283, RR-284, RR-285	Mental health	Comments that the Proposed Development would negatively affect the mental health of local residents. Specific comments raised the loss of access to and views of open countryside and rural tranquillity, and disruption/pollution associated with the construction phase, and stress during the planning stage.	The potential for mental health and wellbeing effects related to environmental change and disruption during the construction phase, along with the Applicant's approach to pre-application engagement and consultation has been considered within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083].** The overarching view based on this assessment – and in the context of concerns about the assessment of effects on mental health and wellbeing – is that: • Engagement has been undertaken via the pre-application statutory, non-statutory consultation and bilateral and community engagement processes set out within the **Consultation Report [EN010158/APP/5.1] [APP-020]** and its appendices that have provided adequate provision of information and consideration of community and stakeholder feedback in the approach to design and assessment development; • Key environmental assessments relating to the potential for effects on mental health have been undertaken (for example relating to noise and air quality), and effects

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			mitigated to their fullest extent such that residual effects are not significant where practically possible – noting that some residual effects remain in terms of landscape and visual impacts; and • Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing. While mental health and wellbeing is individual, subjective and experienced through a range of external factors beyond the Applicant's control, the Applicant considers that the approach taken to provide information, engage and consult, clearly and transparently; assess and mitigate significant environmental effects (where practicable); and secure enhancement measures demonstrates that appropriate measures have been taken to address potential effects on mental health and wellbeing.
RR-35	Mental health	Comment that mental health of farmers has not been considered.	The potential for mental health and wellbeing effects related to socio-economic determinants of health, and particularly in the context of the prevailing nature of farming, has been considered within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]** (see Section 3.7). While there is potential for adverse mental health effects as a result of changes in the agricultural land uses, operations and tenancies as a result of the Proposed Development, measures

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			have been undertaken to avoid or minimise these effects through engagement and negotiation of financial and land-swap compensation as set out within Section 3.7 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**, and **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**, concluding that a significant effect is unlikely at a sub-population scale.
RR-04, RR-17, RR-24, RR-255	Physical health	Comments that the components of the Proposed Development could have an impact on physical health of local residents. Specific references to BESS and inverters.	The potential for physical health and wellbeing effects related to environmental determinants of health as a result of the components and activities of the Proposed Development has been considered throughout the ES and summarised in **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**, which makes specific reference to BESS safety in Section 3.8, summarising the approach taken to ensure safety standards and the communication of them to address concerns about physical and mental health and wellbeing.
RR-51	Visual impact	Comment that the proposal totally disfigures the exceptional rural landscape. Buckinghamshire Council has just helped a project with a whole farm turned	An assessment to determine the effects on the rural landscape is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character

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		into a Health & Wellbeing Centre that overlooks the Order Limits.	Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. It is acknowledged that the character and appearance of the landscape within the Order Limits would therefore change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules, Satellite and Main Collector Compounds, BESS, Rosefield Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. Due to the topographic variation across the Order Limits, the existing framework of woodlands, tree belts and hedgerows,

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			combined with strategic gaps between the three parcels, the Proposed Development would appear subdivided and compartmentalised. In terms of views towards the Proposed Development, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** reports effects on the visual amenity of recreational receptors in the vicinity of the Site, including from PRoW and Hogshaw Farm and Wildlife Park. Bespoke offset buffers have been applied to some routes within Parcel 2 and green infrastructure proposals have been developed which include approximately 4,336 linear metres of new structural hedgerows and over 8.5 hectares of proposed native woodland as identified in the **Outline LEMP [EN010158/APP/7.6] [APP-142]** in order to break up the massing of Solar PV modules. However, with visual effects assessed as moderate adverse (significant) for visitors to Hogshaw Farm, it is acknowledged that residual effects cannot always be mitigated. Such effects will be weighed in the planning balance (see the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**).
Location of the Proposed Development			
RR-157, RR-181, RR-211	Site selection	Comment that the selection of a rural area in close proximity to housing for the location of the	The current national policy sets out that projects such as the Proposed Development may have a significant zone of visual influence with a likely impact on residential amenity and glint and glare. Therefore, the Applicant focused on areas away

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		Proposed Development is inappropriate.	from settlements to ensure a sufficient distance between the Order Limits and surrounding towns and villages to minimise the impact. The available land identified by the Applicant is well sited in relation to nearby towns and villages and has taken opportunities to set back infrastructure and provide screening such as to avoid and/or mitigate potential effects on residential dwellings within close proximity. For more information, please see the **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) and the **Design Approach Document [EN010158/APP/5.8] [APP-038]**.
RR-06	Site selection	Comment that the Proposed Development should be built somewhere where it can be more compact and the land more efficiently used, rather than the proposed Site which is highly constrained and as a result spread out.	An overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development is included within the **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**). This sets out that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints. Section 4.3 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** explains how the Applicant

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			also had consideration for the benefits of seeking a single, contiguous site with as few landowners as possible as this serves to simplify land negotiations, reduces the risk of project failure (due to added complexity of multiple land owners), and reduces reliance on compulsory acquisition.
RR-68	Site selection	Concern that the site was only selected as it includes land owned by a single landowner	An overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development is included within the **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**). This confirms that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints.
RR-71	Site selection	Comment that Applicant has not considered the potential negative effects of the Proposed Development when selecting the proposed Site.	As set out within the **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**), the Applicant took into account a range of criteria, including the potential for adverse effects on dwellings, ecological and geological sites, landscape and visual impacts, flood risk and heritage. The Site was chosen with the aim of reducing these potential impacts alongside consideration of whether the Site was available and suitable for large scale solar deployment

Reference number	Theme	Summary of matter raised	Response
			and whether the Site met other suitability criteria, including irradiance and topography. The Order Limits is considered to meet the above criteria whilst also limiting the potential for negative effects on the surrounding community and environment.
Landscape and visual			
RR-68, RR-143, RR-168, RR-176, RR-182, RR-211, RR-246, RR-260, RR-262, RR-285	Amenity	Comment that the amenity of public footpaths in the open countryside would be gone.	As set out in the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in

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			each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8]** [APP-144].
			The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] reports that there would be a major adverse (significant) effect on users of PRoW between Calvert Road and HS2 and PRoW between Botolph Claydon and Runts Wood; a major/moderate adverse (significant) effect on users of Bernwood Jubilee Way, PRoW to Finemere Hill and PRoW between East Claydon/East Claydon Road to within Parcel 3; and a moderate adverse (significant) effect on users of promoted routes North Buckinghamshire Way/Midshires Way and Swan's Way/Outer Aylesbury Ring.
			Following Phase Two Consultation, mitigation measures have been embedded into the design of the Proposed Development. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] records that by year 10 (following the establishment of mitigation planting), notwithstanding the fact that there would be some screening and softening of views, the majority of significant effects would remain.
			In the case of the North Buckinghamshire Way/Midshires Way, relevant mitigation measures include the removal of the Rosefield Substation and larger scale infrastructure from being proposed in Field E23, with Solar PV modules now only

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			proposed in E23 and the Main Collector Compound (to 6m) in E21-22 as outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]**. Together with green infrastructure proposals by year 10 (following the establishment of mitigation planting), effects would be reduced to moderate/minor (not significant) for users of the promoted route. It is acknowledged that effects on visual amenity of PRoW users cannot always be mitigated and such effects have been weighed in the planning balance (see the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**).
RR-138	Amenity	Comment expressing general concern about loss of visual amenity	The effects of the Proposed Development on visual amenity are fully considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. The assessment concludes that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PRoWs between Botolph Claydon and Runts 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/East Claydon Road within Parcel 3; and Swan's Way/Outer Aylesbury Ring; for residents of Bernwood Farm and Sion Hill Farm; and for visitors to Claydon House and Hogshaw Farm and Wildlife Park; and at

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			Year 1 of operation for users of the North Buckinghamshire Way/Midshires Way and residents of 4-7 Catherine Cottages. Mitigation measures have been embedded into the design of the Proposed Development including approximately 4,336 linear metres of new structural hedgerows and over 8.5 hectares of proposed native woodland. Nevertheless (following the establishment of mitigation planting) the majority of significant effects would remain for the duration of operation as described above.
RR-04, RR-05, RR-06, RR-07, RR-09, RR-11, RR-14, RR-16, RR-21, RR-23, RR-29, RR-32, RR-34, RR-38, RR-39, RR-42, RR-43, RR-44, RR-47, RR-45, RR-51, RR-58, RR-59, RR-65, RR-69, RR-73, RR-75, RR-84, RR-86, RR-89, RR-90, RR-91,	Landscape character	Comment that the Proposed Development will alter the rural character of the area.	An assessment to determine the likely significant effects on landscape character is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. It is acknowledged that the character and appearance of the landscape within the Order Limits would therefore change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV modules, Satellite and Main Collector Compounds, BESS, Rosefield Substation and ancillary infrastructure such

Reference number	Theme	Summary of matter raised	Response
RR-102, RR-103, RR-105, RR-106, RR-107, RR-108, RR-110, RR-111, RR-112, RR-113, RR-114, RR-115, RR-116, RR-118, RR-120, RR-126, RR-127, RR-128, RR-133, RR-134, RR-136, RR-137, RR-140, RR-141, RR-142, RR-143, RR-129, RR-144, RR-145, RR-147, RR-151, RR-152, RR-153, RR-156, RR-158, RR-160, RR-161, RR-162, RR-164, RR-166, RR-170, RR-173, RR-174, RR-176, RR-182, RR-185, RR-187, RR-188, RR-194, RR-197, RR-198, RR-199, RR-204, RR-205,			as fencing and CCTV into fields which are currently in agricultural land use. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site. The extent of manufactured metallic and glass structures introduced into the landscape would be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. Due to the topographic variation across the Order Limits, the existing framework of woodlands, tree belts and hedgerows, combined with strategic gaps between the three parcels, the Proposed Development would appear subdivided and compartmentalised.

Reference number	Theme	Summary of matter raised	Response
RR-207, RR-209, RR-215, RR-216, RR-218, RR-219, RR-220, RR-224, RR-227, RR-231, RR-232, RR-233, RR-234, RR-235, RR-240, RR-241, RR-242, RR-242, RR-247, RR-249, RR-250, RR-254, RR-255, RR-261, RR-265, RR-267, RR-268, RR-271, RR-273, RR-277, RR-280, RR-281, RR-285, RR-287, RR-289			
RR-30, RR-43, RR-45, RR-68, RR-84, RR-96, RR-103, RR-120, RR-126, RR-156	Mitigation	Comment that proposed mitigation is not adequate. Specific concern raised about the amount of time that planting will take to mature, as well as the	The embedded mitigation, and assumptions regarding growth rates, is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] and associated figures in **ES Volume 3 [EN010158/APP/6.3]** [APP-069]. This includes reference to the method by which the embedded mitigation is secured, including areas for early planting, which is generally the **Outline LEMP [EN010158/APP/7.6]** [APP-142] or the **Design Commitments [EN010158/APP/5.9.2]**

Reference number	Theme	Summary of matter raised	Response
		intrusion of tall planting in the landscape.	**[AS-018]** 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 design process and with 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/5.8]** [**APP-038**] 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'. The mitigation proposals respond directly to specific guidelines in the Aylesbury Vale Landscape Character Assessment and are based on robust baseline surveys tailored to local landscape and visual receptors and consultations with relevant consultation bodies. The proposed extensive new hedgerow and structural planting would be planted in accordance with the **Green and Blue Infrastructure Parameters** (**Appendix 1** of the **Outline LEMP [EN010158/APP/7.6]** [**APP-142**]). The total length of new hedgerow (at least 3,420m) and structural woodland planting (at least c. 8.5ha) proposed within the Order Limits would far exceed the amount removed during construction. Hedgerow heights would be maintained up to 3.5m to achieve effective screening and managed over the operational (including maintenance) phase of the Proposed Development.

Reference number	Theme	Summary of matter raised	Response
			Other than hedgerows, trees and scrub would continue to grow naturally over the operational life of the Proposed Development. Nevertheless, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] reports that there would be a number of significant adverse landscape and visual effects. It is acknowledged that residual effects cannot always be mitigated and such effects have been weighed in the planning balance set out in the **Planning Statement [EN010158/APP/5.7.2]** [AS-027].
RR-51	Quainton Hills	Comment that Quainton Hills would have views of the Proposed Development.	The Applicant has undertaken a detailed assessment of effects on views as presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] which includes assessment of views of the Proposed Development from Quainton Hill. These views are illustrated by the visualisations in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-116] and include photomontage in [APP-117]. The assessment concludes that significant adverse visual effects for walkers on Quainton Hill are likely to occur at Year 1 and would remain for the duration of operation for users of PRoW and the Swan's Way/Outer Aylesbury Ring. Effects have also been assessed as significant for the North Buckinghamshire Way/Midshires Way which also crosses part of Quainton Hill. However, these effects are primarily as a

Reference number	Theme	Summary of matter raised	Response
			result of users passing within the Order Limits in Parcel 3 of the Proposed Development and not due to the longer distance views from Quainton Hill.
RR-116, RR-143	Visual impact	Comment that the BESS is visually unattractive.	The BESS has been proposed in Fields D8 and D9, which are the lowest lying fields within Parcel 2, with the purpose of reducing visibility within the wider landscape. As set out in the **Design Approach Document [EN010158/APP/5.8] [APP-038]** green infrastructure proposals have been developed which include for new hedgerows and native woodland mitigation planting which would break up the amount of development viewed by footpath users. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** records that by year 10 (following the establishment of mitigation planting) there would be some screening and softening of views from footpaths as a result of established woodland belt planting in Field D19. It is also acknowledged that effects on visual amenity cannot always be mitigated and such effects have been weighed in the planning balance, as considered in the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**. Further detail on potential landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** and is supported by several figures presented in **ES Volume 3, Figure 10.1 – 10.26 [EN010158/APP/6.3] [APP-069]**, including Zone of

Reference number	Theme	Summary of matter raised	Response
			Theoretical Visibility (ZTV) analysis to show the extent visibility for structures up to 6m.
RR-29, RR-43, RR-48, RR-51, RR-117, RR-126 RR-131, RR-140, RR-143, RR-170, RR-182, RR-188, RR-238	Visual impact	Comment expressing concern about visual impacts on villages and properties within villages. Specific reference made to Botolph Claydon, East Claydon, Steeple Claydon, Winslow, Calvert, Hogshaw, Pitchcott, Oving and Granborough.	Residents and visitors to the villages of Botolph Claydon, Granborough, North Marston, Oving and Steeple Claydon have been included in the assessment of visual effects in agreement with Buckinghamshire Landscape Officers as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053]. No significant effects have been assessed for any of the settlements included within the study as a result of the Proposed Development. It was agreed that other settlements would be excluded on the basis that there would be no likely significant effects as a result of the Proposed Development. As set out more fully in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], the design of the Proposed Development has evolved to consider views from these villages and their settings. This is particularly the case for views from Botolph Claydon which lies closest to the Proposed Development. In response to concern about visual impact, the four fields closest to the southern edge of Botolph Claydon were no longer considered for solar following Phase One Consultation and following Phase Two Consultation these fields were removed from the Order Limits altogether. Following Phase One Consultation Fields D8, D9, D18 and D19 were no longer proposed as an option for the Rosefield

Reference number	Theme	Summary of matter raised	Response
			Substation to reduce potential visual effects. In response to feedback received during the Phase Two Consultation, the BESS and Rosefield Substation were no longer proposed in Field E23 of Parcel 3, in part to address views from Botolph Claydon and East Claydon. The design of the Proposed Development has therefore evolved to consider views from settlements, with no significant effects reported in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053].
RR-03, RR-16, RR-24, RR-30, RR-43, RR-45, RR-52, RR-55, RR-57, RR-68, RR-71, RR-74, RR-89, RR-91, RR-96, RR-110, RR-122, RR-125, RR-126, RR-132, RR-133, RR-138, RR-143, RR-160, RR-204, RR-214, RR-242, RR-246, RR-248, RR-288	Visual impact	Comment expressing general concern about the visual impact of the Proposed Development.	The design of the Proposed Development has evolved to consider visual impacts. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053] the Applicant recognises that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PRoWs between Botolph Claydon and Runts Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runts Wood); PRoW between East Claydon/East Claydon Road within Parcel 3; and Swan's Way/Outer Aylesbury Ring; for residents of Bernwood Farm and Sion Hill Farm; and for visitors to Claydon House and Hogshaw Farm and Wildlife Park; and at Year 1 of operation for users of the North Buckinghamshire Way/Midshires Way and residents of 4-7 Catherine Cottages.

Reference number	Theme	Summary of matter raised	Response
			As set out in the **Design Approach Document [EN010158/APP/5.8]** [APP-038] mitigation measures have been embedded into the design of the Proposed Development including approximately 4,336 linear metres of new structural hedgerows and over 8.5 hectares of proposed native woodland. Nevertheless (following the establishment of mitigation planting) the majority of significant effects would remain for the duration of operation as described above.
RR-41, RR-67, RR-68, RR-71, RR-156, RR-188, RR-190, RR-211, RR-260	Visual impact	Comment expressing concern about visual impacts on people using Public Rights of Way. Specific reference made to views from paths on Quainton Hill and Bernwood Farm.	The impacts on users of PRoW to Quainton Hill have been considered above. The effects on users of PRoW extending to the southern extent of Botolph Claydon/Bernwood Farm are presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2]** [APP-053]. These views are illustrated by the visualisations in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-115] and include photomontage in [APP-117]. It is reported that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PRoW between Botolph Claydon and Runt's Wood (including Splash Lane and Bernwood Jubilee Way); PRoW to Finemere Hill (including the permissive route to Runt's Wood); and for residents of Bernwood Farm itself. It is therefore acknowledged that effects on visual amenity cannot always be mitigated and such effects will be weighed

Reference number	Theme	Summary of matter raised	Response
			in the planning balance as considered in the **Planning Statement [EN010158/APP/5.7.2]** [AS-027].
Need			
RR-01, RR-30, RR-32, RR-37, RR-64, RR-68, RR-71, RR-92, RR-96, RR-103, RR-104, RR-108, RR-116, RR-119, RR-120, RR-122, RR-131, RR-135, RR-160, RR-166, RR-206, RR-207, RR-210	Demand	Comment that the National Grid is oversubscribed with grid connection applications and therefore the Proposed Development is not needed. Specific comments reference the amount of projects that have been approved or are under construction in the T5 region, which is already sufficient to meet the region's target.	In December 2025, NESO published the high-level results of its connection queue re-prioritisation process. This has sought to prioritise projects for delivery to achieve the government's current capacity ranges. The Applicant has received confirmation that its has been included within the re-prioritised connections queue. The Proposed Development is therefore needed to contribute to meeting the current capacity ranges. With regard for the wider context, the **Statement of Need [EN010158/APP/5.6]** [APP-036] explains how not all projects are accepted (for example, in February 2023 National Grid found that only 30-40% of these applications came to fruition). Furthermore, of the 243GW of projects of all technologies listed on the Q1 2025 Renewable Energy Planning Database (REPD), only 52.6GW are operational and 46.7GW will not move forwards due to the refusal of planning consent, being abandoned (by the developer), or the planning permission expiring. The government target for regional capacity in the Central England area is 2.1GW in 2030, rising to 9.5GW in 2035. The Transmission Entry Capacity (TEC) register includes 1.7GW

Reference number	Theme	Summary of matter raised	Response
			of consented large-scale solar capacity in the Central England area, and of this total only ~100MW is currently operational. More information can be found within the **Statement of Need [EN010158/APP/5.6]** [APP-036].
RR-66, RR-86	Demand	Comment that the Proposed Development is not needed as future energy demand has been incorrectly assessed.	The Applicant respectfully disagrees. The **Statement of Need [EN010158/APP/5.6]** [APP-036] confirms that the Government's Clean Power 2030 Action Plan establishes challenging capacity ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The government's capacity ranges for large-scale solar schemes, are currently 45-47GW by 2030 and 45-69GW by 2035. The need for new schemes will continue beyond 2035 not only to ensure that electricity demand is met from low carbon supplies, but also so that sufficient electricity is produced in Great Britain to power a growing number of electric vehicles thereby enabling petrol cars to be taken off our roads, and to power homes so gas boilers and cookers can be removed, and also so that other fossil fuels can be removed as an energy source for industrial and commercial processes. More information can be found within the **Statement of Need [EN010158/APP/5.6]** [APP-036].

Reference number	Theme	Summary of matter raised	Response
RR-03, RR-13, RR-17, RR-30, RR-43, RR-63, RR-78, RR-106, RR-139, RR-170, RR-171, RR-183, RR-243	General - need	General comment that the Proposed Development is not needed.	The substantial benefits and need for the Proposed Development is set out in Section 3 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** and the **Statement of Need [EN010158/APP/5.6] [APP-036]**. These documents set out the urgent need for the Proposed Development, and how it is supported by international and national legislation and policy.
RR-122	Need	Comment that the UK should prioritise upgrading the existing grid before building out new projects.	The Applicant considers that upgrading the existing grid and building out new projects are not an either-or prioritisation-wise but must, instead, be progressed at speed and in tandem. NESO's re-prioritisation of the connections queue has prioritised generation and transmission network infrastructure projects needed for 2030, whilst maintaining a robust pipeline beyond 2030. This is National Grid's largest overhaul of the electricity grid in generations. It's infrastructure projects across England and Wales are helping to connect more affordable sources of home-grown and renewable energy to homes and businesses. In December 2025, NESO published the high-level results of its connection queue re-prioritisation process. This has sought to prioritise projects for delivery to achieve the government's current capacity ranges. The Applicant has received confirmation it has been included within the re-prioritised connections queue. The Proposed

Reference number	Theme	Summary of matter raised	Response
			Development is therefore needed to contribute to meeting the Government's current Clean Power capacity ranges. The **Statement of Need [EN010158/APP/5.6]** [APP-036] demonstrates how the overwhelming national need for the Proposed Development outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.
RR-190, RR-220	Other projects	Comment that the Proposed Development has catalysed several other energy projects in the local area, including the replacement of the East Claydon Substation and nearby BESS and solar farms.	The Applicant respectfully disagrees with this comment. The Applicant secured a grid connection agreement at National Grid East Claydon Substation, where there was capacity as set out within the **Grid Connection Statement [EN010158/APP/7.1]** [APP-137]. Subsequent projects which have been launched which also seek to connect at National Grid East Claydon Substation are not connected to the Proposed Development.
RR-86, RR-262	Principle of development	Comment that the Proposed Development should not be built until the replacement East Claydon Substation has been built.	As recorded in the **Grid Connection Statement [EN010158/APP/7.1]** [APP-137], the Applicant has a grid connection offer at the National Grid East Claydon Substation. The Applicant understands that in order to meet its customer connections, National Grid needs to replace the existing East Claydon Substation (originally built in the 1960s) as it is coming to the end of its useful life. Permission for the replacement of National Grid East Claydon Substation is expected to be sought by National Grid in due course through

Reference number	Theme	Summary of matter raised	Response
			a Town and Country Planning Act 1990 application. The Applicant is not aware of any obvious reason why the replacement East Claydon Substation would not receive planning permission. In terms of the suggestion that the commencement of the Proposed Development should be in some way be restricted based on milestones achieved for the East Claydon Substation, there is no justification for this approach. Paragraph 4.1.19 of NPS EN-1 recognises that the Secretary of State may consider imposing obligations but that such obligations must be: relevant, necessary to make the Proposed Development acceptable in planning terms, directly related to the Proposed Development, be fair and reasonably related in scale and kind and be reasonable in all other respects. The Applicant already has its grid connection offer and considers that such a requirement could prevent the Proposed Development from being carried out in a timely and efficient manner, which is not appropriate having regard to the urgent need to deliver renewable energy. It should be noted that the Applicant's decision to commence construction of the Proposed Development would also be driven by commercial considerations, and it is highly unlikely that the Applicant would construct the Proposed Development without sufficient

Reference number	Theme	Summary of matter raised	Response
			confidence that a grid connection would be in place for the export of the energy generated.
RR-137, RR-160, RR-210	Principle of development	Comment that the Application has not provided enough evidence to justify the need for the Proposed Development.	The **Statement of Need [EN010158/APP/5.6]** [APP-036] demonstrates how the overwhelming national need outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited. The substantial benefits and need for the Proposed Development set out in Section 3 of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027], including the delivery of CNP Infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development with no requirement to demonstrate exceptional circumstances given that there is an established presumption in favour of the granting of the DCO Application.
RR-40	Principle of development	Comment that the Applicant's justification of need is sufficient and that the landowners are entitled to use their land as they see fit.	The Applicant notes this comment.
RR-68	Statement of Need	Comment that the Statement of Need is not well-made, as the	As referenced in the **Statement of Need [EN010158/APP/5.6]** [APP-036], the Government's Clean Power 2030 Action Plan establishes challenging capacity

Reference number	Theme	Summary of matter raised	Response
		Applicant has not reconciled the 'urgent need' for the Proposed Development against the likely delay in connecting into the grid and uncertainties associated with NESO connection reform.	ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The government's capacity ranges for large-scale solar schemes are currently 45-47GW by 2030 and 45-69GW by 2035. However, the need for new schemes will continue beyond 2035 not only to ensure that electricity demand is met from low carbon supplies, but also so that sufficient electricity is produced in Great Britain to power a growing number of electric vehicles thereby enabling petrol cars to be taken off our roads, and to power homes so gas boilers and cookers can be removed, and also so that other fossil fuels can be removed as an energy source for industrial and commercial processes. To mitigate against any risks which may materialise in the development of projects of all technologies needed to achieve Clean Power, the Government has retained a degree of optionality in its approach to achieving net zero (CP2030, p31). The capacity ranges are not fixed and therefore there is a need for schemes to continue to come forward even if the capacity ranges are met. In December 2025, NESO published the high-level results of their connection queue re-prioritisation process. This has sought to prioritise projects for delivery to achieve the government's current capacity ranges.

Reference number	Theme	Summary of matter raised	Response
			The Applicant has received confirmation that it has been included within the re-prioritised connections queue. The Proposed Development is therefore needed to contribute to meeting the current capacity ranges.
RR-68, RR-71	Statement of Need	Comment that the Applicant does not provide an evidence base for need beyond the 2030s, relying instead on their own speculation that the Proposed Development would be needed.	As referenced in the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**, the Government's Clean Power 2030 Action Plan establishes challenging capacity ranges for wind, nuclear, storage and low-carbon flexible schemes, all of which are required to deliver net zero. The government's capacity ranges for large-scale solar schemes are currently 45-47GW by 2030 and 45-69GW by 2035. However, the need for new schemes will continue beyond 2035 not only to ensure that electricity demand is met from low carbon supplies, but also so that sufficient electricity is produced in Great Britain to power a growing number of electric vehicles thereby enabling petrol cars to be taken off our roads, and to power homes so gas boilers and cookers can be removed, and also so that other fossil fuels can be removed as an energy source for industrial and commercial processes. The Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55) and the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure, that: *"Clean Power 2030 is a milestone that reflects the scale of*

Reference number	Theme	Summary of matter raised	Response
			ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals".
Noise and vibration			
RR-30, RR-96, RR-126	Approach to assessment	Comments that noise assessments are insufficient. Specific comments raised that the noise of the BESS, collector compounds and inverters on this scale require assessment.	Sources of noise and vibration associated with the Proposed Development, including BESS, collector compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. 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] [APP-060]**. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures.
RR-126	Approach to assessment	Comment that no receptors in Granborough were used for the noise assessment despite it being close to Parcel 3.	Receptors in Granborough are included in the noise assessment. The assessment concludes that the effects from noise and vibration are not significant, following adoption of appropriate mitigation measures. For more detail see **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]**.
RR-71, RR-143	Biodiversity	Concerns around the impact of construction	Potential disturbance to livestock would be managed through the appropriate consultation with the relevant landowners and/or tenants so that they are aware of the construction

Reference number	Theme	Summary of matter raised	Response
		and/or operational noise on livestock and/or wildlife	works that would be taking place close to particular fields, and that the control measures with regards noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable. The Applicant is committed to ongoing consultation with relevant landowners and/or tenants with regards potential impacts from noise on livestock during construction. Disturbance to ecological (wildlife) receptors may come about through noise, with respect to ecological receptors including birds, otter and badgers. A full assessment has been undertaken within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2] [APP-050]**. The **Outline CEMP [EN010158/APP/7.2] [APP-138]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** details and secures the control measures to mitigate potential construction related effects to noise and vibration. With respect to noise and bats, until recently, most measurements of noise were undertaken to determine impacts on human receptors rather than bats. Such measurements are typically 'weighted' to reflect the relative loudness of sounds as perceived by the human ear rather than unweighted noise levels. 'A-weighted' data (represented as dBA) emphasise sounds inaudible to bats whilst under-representing those audible to bats. However, there is increasing awareness of the need to use unweighted measurements and examples of such unweighted data are

Reference number	Theme	Summary of matter raised	Response
			now available within the Bat Mitigation Guidelines (Reason & Wray, 2025). These guidelines also provide a template for noise assessments. At Deadline 1, the Applicant will present an assessment of the risk of disturbance from construction noise generated by elements of the Proposed Development (using a template which has been accepted by Natural England in licence applications) in a Technical Note. This assessment also summarises a high-frequency unweighted noise study carried out at an operational solar farm. Neither construction nor operation are considered to represent a significant source of noise disturbance; however, some pre-construction assessments may be required depending on haul route layout and programme. For the most part, as disturbance is unlikely, even for the low threshold of disturbance for offences which derive from domestic legislation (see detailed noise impact assessment), the extended restrictions suggested are not based on evidence and not required. In the absence of a licence, a Precautionary Working Method Statement will be produced and secured via **Outline CEMP [EN010158/APP/7.2] [APP-138].**
RR-30, RR-34, RR-43, RR-83,	Emissions	Comments that there would be noise pollution	The dominant sources of noise and vibration associated with the Proposed Development including the BESS, collector

Reference number	Theme	Summary of matter raised	Response
RR-84, RR-103, RR-104, RR-105, RR-120, RR-122, RR-126, RR-131, RR-135, RR-143, RR-176, RR-199, RR-209, RR-246, RR-277, RR-285		from specific elements of the Proposed Development during operation including the BESS, collector compounds, inverters, fencing and CCTV, and transformers.	compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. 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] [APP-060]**. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures.
RR-103, RR-120	Emissions from synchronous compensators	Concerns around noise from synchronous compensators	Synchronous compensators are not proposed as part of the Proposed Development.
RR-03, RR-11, RR-14, RR-15, RR-24, RR-30, RR-34, RR-43, RR-47, RR-83, RR-84, RR-86, RR-96, RR-103, RR-104, RR-110, RR-114, RR-116, RR-120, RR-125, RR-126, R-135, RR-140, RR-142,	General – construction noise	Comments expressing concern about noise and vibration emitted during the construction phase.	Sources of construction induced noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. 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] [APP-060]**. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures.

Reference number	Theme	Summary of matter raised	Response
RR-145, RR-147, RR-151, RR-152, RR-162, RR-164, RR-174, , RR-181, RR-189, RR-205, RR-215, RR-216, RR-247, RR-249, RR-254, RR-256, RR-261, RR-262, RR-265, RR-278, RR-271, RR-280, RR-281			Construction works are proposed be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with Buckinghamshire Council. This aligns with the Buckinghamshire Council guidelines for construction sites and British Standard 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites'. The proposed working periods are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2]** [APP-138].
RR-03, RR-11, RR-14, RR-24, RR-30, RR-34, RR-43, RR-47, RR-78, RR-83, RR-84, RR-86, RR-88, RR-110, RR-122, RR-125, RR-131, RR-140, RR-142, RR-145,	General – operational noise	Comments expressing concern about noise and vibration emitted during the operational phase.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** [APP-056]. 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]** [APP-060]. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures. This includes consideration of potential

Reference number	Theme	Summary of matter raised	Response
RR-147, RR-151, RR-152, RR-162, RR-164, RR-174, RR-176, RR-188, RR-205, RR-216, RR-247, RR-249, RR-254 , RR-256, RR-261, RR-265, RR-278, RR-280, RR-281, RR-288			acoustic characteristics such as a 'hum' that may arise from noise-generating installations associated with the solar panels, as required by British Standard BS4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.
RR-188	General comment - noise	Comment that noise and vibration during construction and operation near the school in East Claydon would negatively affect concentration, learning time, and overall wellbeing.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. This includes receptors within East Claydon which are representative of the school premises. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures. This conclusion applies to the school in East Claydon.
RR-15, RR-29, RR-91, RR-121, RR-122, RR-132, RR-133, RR-138, RR-199, RR-219,	General comment - noise	Comment opposing the Proposed Development due to noise effects.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. The assessment concludes that the effects from

Reference number	Theme	Summary of matter raised	Response
RR-242, RR-248, RR-283			noise and vibration are not significant following adoption of appropriate mitigation measures.
RR-03, RR-43, RR-67, RR-83	Human health	Comments expressing concern about the physical and mental health impacts of operational noise from the Proposed Development. Specific comments raise noise from the cooling fans and inverters.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures. The potential for noise to cause adverse effects on physical and mental health and wellbeing have been considered within **ES Volume 4 Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4] [APP-083]**, in the context of likely significant effects reported within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]** applied to the sensitivity of populations and sub-populations. As set out above, the effects from noise and vibration during the operational phase are not significant following adoption of appropriate mitigation measures.
RR-247	Orchard Way	Comment that there would be noise impacts on residents of Orchard Way.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2] [APP-056]**. This includes assessment at receptors representative of dwellings on Orchard Way.

Reference number	Theme	Summary of matter raised	Response
			The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures. This is consistent with the NPPF requirement to prevent existing development from being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution.
RR-83	Topography	Concern that noise emitted by the BESS would travel due to the site's sloped topography and affect local residents.	Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** [APP-056]. The assessment is informed by modelling and calculations which account for the topography of the area surrounding the Proposed Development.
Operations			
RR-10, RR-141, RR-145	Lifespan	Comments on the lifespan of the Proposed Development, including both that it is too short and too long.	An operational 40-year lifespan is typical of DCO-scale solar projects.
RR-29, RR-78, RR-84, RR-89, RR-91, RR-110, RR-116, RR-133, RR-135, RR-143,	Light pollution	Concerns around light pollution from security lighting. Specific comments raised that	Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting. There would be no permanent (continuous) lighting for

Reference number	Theme	Summary of matter raised	Response
RR-148, RR-188, RR-234		dark skies are currently enjoyed in the local area.	security purposes except at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.2] [AS-018]** and **Outline CEMP [EN010158/APP/7.2] [APP-138]**. Lighting information is provided in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** with lighting proposed to be used only on an ad-hoc basis for health and safety or emergency purposes during operation. During consultation with Buckinghamshire Council, it was agreed that any such lighting effects during the operational (including maintenance) phase would not be significant and could be scoped out. The effects of temporary lighting during construction are included in **Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**.
RR-215	Management	Comment requesting clarification on who would be responsible for site maintenance, repairs and replacement of the solar panels.	The site operators would be responsible for site maintenance, repairs and replacement of the solar panels. Please refer to section 2.11 of **Outline OEMP [EN010158/APP/7.3] [APP-139]** for more details of the maintenance, repair and replacement works during the operational (including maintenance) phase of the Proposed Development. A planned maintenance schedule would be submitted every 12 months

Reference number	Theme	Summary of matter raised	Response
			from the date of final commissioning to the relevant planning authority.
RR-148	Pollution	Comment expressing concern about pollution during the operational stage.	There are sufficient measures in place secured through the **Outline OEMP [EN010158/APP/7.3] [APP-139]** and **Outline BSMP [EN010158/APP/7.9] [APP-145]** to mitigate any pollution during the operational phase. The **Outline OEMP [EN010158/APP/7.3] [APP-139]** shows the principles and key measures that would be employed during the operational stage and includes details on mitigation measures for potential pollution sources such as air pollution, spillages, leaks, water and light pollution. Additionally, in regards to operational phase traffic impacts on air quality, the Proposed Development is not expected to generate traffic exceeding the relevant guidance screening criteria once operational, as such the effect of road traffic exhaust emissions during operation phase without mitigation measures is considered to be not significant. The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9] [APP-145]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to nearby human health receptors, including to the

Reference number	Theme	Summary of matter raised	Response
			closest residential receptors to the proposed BESS compound (approx. 400 metres to Borshaw Farm).
RR-146	Safety	Comment expressing concern about operational safety.	The **Outline BSMP [EN010158/APP/7.9]** [APP-145] sets out the approach to be taken to manage the safety of the BESS in accordance with regulatory requirements, guidance, and good industry practice. It also addresses aspects such as safe design, construction, operation, and disposal and the strategy for firefighting and emergency planning. An additional Health and Safety plan would be drafted as part of the detailed OEMP prior to the operation of the Proposed Development (as secured by the **Outline OEMP [EN010158/APP/7.3]** [APP-139]).
Policy			
RR-135, RR-140	Compliance with local policy	Comment that the Proposed Development is similar in nature to other large-scale infrastructure applications made in the local area which Buckinghamshire Council have refused.	The Proposed Development is a Nationally Significant Infrastructure Project and is applying for permission via DCO. The Planning Act 2008 sets out that the Secretary of State is responsible for determining whether to grant a DCO for the Proposed Development and, under the Planning Act 2008, has the power to appoint an Examining Authority of an appointed person(s) from the Planning Inspectorate to manage and examine the DCO Application on behalf of the Secretary of State.

Reference number	Theme	Summary of matter raised	Response
			The Examining Authority, rather than Buckinghamshire Council, will make procedural decisions and then make a recommendation to the Secretary of State who would then decide whether to grant a DCO.
RR-43, RR-220, RR-269	Compliance with local policy	Concern that the proposed development does not comply with the Vale of Aylesbury Local Plan, with specific reference to policies NE1, NE4, NE5, BE2, C3.	The Applicant respectfully disagrees. Table 1-6 of **Appendix 4** and Section 9 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** provide assessment of the Proposed Development against policies within the Vale of Aylesbury Local Plan 2013 – 2033, inclusive of policies NE1, NE4, NE5, BE2 and C3. The assessments do not conclude any non-compliance with the relevant local planning policies.
RR-220	Compliance with local policy	Comment that the Applicant should still have regard to relevant local planning policies despite being a DCO.	The Applicant confirms that it has had regard for relevant local planning policies, as evidenced within the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**. In addition to the National Policy Statements for Energy, the Applicant considers that the following planning policy documents are both important and relevant to the Secretary of State's decision and must, therefore, be regarded: the NPPF (2024), the NPPG (as relevant) (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the Buckinghamshire Minerals and Waste Local Plan 2016 – 2036 and relevant Neighbourhood Plans.
RR-43	Compliance with local policy	Comment that the Proposed Development	Table 1-8 of **Appendix 4** and Section 9 of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** provide detailed

Reference number	Theme	Summary of matter raised	Response
		does not comply with local neighbourhood plans.	consideration and demonstration of compliance to the relevant policies within the relevant Neighbourhood Plans.
RR-220, RR-269	Compliance with national policy	Comment that the Proposed Development does not comply with the NPPF, with specific references to paragraph 155, Sections 2 and 15 and Footnote 62.	Table 1-4 of **Appendix 4** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** provides detailed consideration of the Proposed Development's compliance with relevant NPPF paragraphs. This includes consideration of the paragraphs under Sections 2 and 15 of the NPPF (2024) but not Paragraph 165, which the Applicant considers to be paragraph 155, which the Relevant Representation references, as this is a plan-making policy.
RR-68	Compliance with national policy	Comment that the Applicant's approach to site selection process does not follow guidelines set out in NPS EN-1.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.2] [AS-027]**) confirms through Section 2 that there is no standard methodology for the site selection of solar farms. Notwithstanding this, the site selection methodology has been informed by guidelines set out in NPS EN-1 (2024) as well as NPS EN-3 (2024), NPS EN-5 (2024), the NPPF (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG (as relevant) (2024) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
RR-68	Compliance with national policy	Comment that the Application does not have regard to potential socio-economic impacts as set	Table 1-1 of **Appendix 4** of the **Planning Statement [EN010158/APP/5.7.2] [AS-027]** provides a direct assessment against Paragraphs 5.13.5 and 5.13.9 of NPS EN-1. These assessments conclude that the Proposed

Reference number	Theme	Summary of matter raised	Response
		out in Paragraphs 5.13.5 and 5.13.9 of NPS EN-1.	Development has had regard to and is compliant with the paragraphs.
RR-40, RR-229	Compliance with national policy	Comment that the Proposed Development does comply with national policies and energy generation targets. Specific reference made to the NPPF.	The Applicant notes this comment. Sections 9 and 10 of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027] set out how the Applicant has had regard to relevant local and national policies and how the DCO Application has been informed by and is in compliance with relevant planning policies. Table 1-4 of **Appendix 4** of the **Planning Statement [EN010158/APP/5.7.2]** [AS-027] demonstrates the Proposed Development's compliance with the NPPF.
Population			
RR-68	Approach to assessment	Comment that **ES Volume 4 Appendix 14.1: List of Commercial Operations/Businesses within the Community Study Area [EN010158/APP/6.4]** [APP-130] does not identify any working farms, including one	Agricultural landholdings and tenants have been recorded separately to non-agricultural commercial operations/businesses, and are set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** [APP-057] from paragraph 14.5.48.

Reference number	Theme	Summary of matter raised	Response
		which supports TCS Biosciences Ltd.	
RR-255	Crime	Comment that there would be an increase in local crime due to potential thefts of copper and solar panels.	Security details are included within the design of the Proposed Development to deter criminals from theft. The design includes security measures, including fencing, CCTV cameras and lighting in critical areas. These are outlined in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] [APP-046]** and would continue to be developed during the detailed design phase. The Rosefield Substation compound would be secured using a metallic or green-coloured palisade security fence or a monitored pulse fence and wire mesh fence. A security cabin would be located at the main gate to the Rosefield Substation. The Satellite Collector Compounds would be secured using a metallic or green-coloured palisade security fence or a monitored pulse fence and wire mesh fence. Within the BESS and Main Collector Compound areas security and monitoring equipment and a security cabin along with metallic or green-coloured palisade and security fence or monitored pulse fencing would be installed. Within the Solar PV fields deer fencing would be installed formed of wooden and or metal posts and wire mesh up to 2.5m in height. Pole-mounted internal- facing CCTV systems would be installed at a height up to 5m. During its operating

Reference number	Theme	Summary of matter raised	Response
			life, the Proposed Development would also be subject to regular inspections and maintenance from operational staff.
RR-110	Hogshaw Farm and Wildlife Park	Comments expressing concern about potential impacts on the viability of Hogshaw Farm and Wildlife Park during the construction and operational phases. Specific potential impacts include noise, traffic, lighting, visual access and disruption to public access.	Effects on local businesses and components of the local tourist economy – including Hogshaw Farm and Wildlife Park – are set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** [APP-057] which draws upon other assessments within the ES to consider whether noise, traffic, lighting, visual access and disruption to public access would affect viability. In each case, non-significant effects are reported except for landscape and visual amenity effects which would be of moderate adverse significance, following the application of design measures and mitigation. However, given the diversity of offer at Hogshaw Farm and Wildlife Park and the nature of its commercial activity, this change is not anticipated to affect the viability of the business.
RR-29, RR-68, RR-71, RR-190, RR-29, RR-269, RR-283	Job creation	Comments that there would not be any significant, local permanent jobs beyond the construction phase, and that those claimed had not been substantiated.	It is estimated in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** [APP-057] that the operation (including maintenance) phase would support around 24 FTE jobs, with additional staff attending when required for maintenance, replacement of faulty or end of service life solar equipment, vegetation management activities and cleaning.

Reference number	Theme	Summary of matter raised	Response
RR-16, RR-29, RR-35, RR-43, RR-62, RR-95, RR-122, RR-131, RR-138, RR-143, RR-144, RR-145, RR-157, RR-167, RR-190, RR-209, RR-234, RR-240, RR-269, RR-271	Local benefits	Comment that there would be no benefits of the Proposed Development for local residents.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** highlights the wider benefits that the Proposed Development would bring to local communities surrounding the Proposed Development in regards to employment, workforce spending and GVA/supply chain benefits, which are as follows: • 420 to 470 net additional FTE jobs per year of construction within the Construction Labour Market Area (CLMA), and 180 in the CLMA Focus Area; • £28.5m and £12.2m in the form of construction GVA within the CLMA and the CLMA Focus Area per year, respectively; • £1.9m on average per year in the form of construction workforce spending; • 18 net additional operational FTE jobs within Buckinghamshire; and • £74,000 on average per year in the form of operational workforce spending. The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** also highlights the wider benefits that the Proposed Development would bring to the local community and the economy, including:

Reference number	Theme	Summary of matter raised	Response
			• proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of PRoWs; • the creation of three permissive paths; • a Community Benefit Fund reflecting £400 per megawatt per year from the start of operation and lasting throughout the operational lifetime of the Proposed Development; and • an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector, with a sum of £50,000 set to be allocated annually from the Date of Commencement until the Date of Decommissioning.
RR-67, RR-78, RR-82, RR-105, RR-115, RR-118, RR-190, RR-236, RR-284	Local businesses	Comment that the Proposed Development would have a negative effect on local businesses.	Effects on local businesses are set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** which draws upon other assessments within the ES to consider whether noise, traffic, lighting, visual access and disruption to public access would affect viability. In each case, non-significant effects are reported except for landscape and visual amenity effects which would be of moderate adverse significance for two businesses only, following the application of design measures and mitigation. However, given the diversity of offer and the nature of the commercial activity, this change is not anticipated to affect the viability of the business.

Reference number	Theme	Summary of matter raised	Response
RR-68, RR-71	Local jobs	Comment that construction workers would be drawn from a wide area and be temporary, meaning there would be limited benefits locally to construction-phase jobs.	The assessment within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** sets out that the construction phase of the Proposed Development would support: • 420 to 470 net additional FTE jobs per year of construction within the Construction Labour Market Area (CLMA), and 180 in the CLMA Focus Area; • £28.5m and £12.2m in the form of construction GVA within the CLMA and the CLMA Focus Area per year, respectively; • £1.9m on average per year in the form of construction workforce spending. To help maximise the positive gain for the local economy from the beneficial effect arising from employment generation during the construction phase, an **Outline ESSCP [EN010158/APP/7.14] [APP-150]** supports the DCO Application. This secures commitments to work with partners and the local and regional construction supply chain to enhance the proportion of activities that can be accessed by local people (both in employment, unemployed and economically inactive or outside of the current labour market) and firms with relevant experience and competencies.

Reference number	Theme	Summary of matter raised	Response
RR-17, RR-43, RR-64, RR-68, RR-71, RR-78, RR-80, RR-92, RR-102, RR-105, RR-108, RR-118, RR-124, RR-145, RR-146, RR-222, RR-233, RR-238, RR-248, RR-288	Local community	Comment that the Proposed Development would have a negative effect on the local community.	In line with the requirements of the EIA Regulations (2017) and NPS EN-1 and NPS EN-3, the Applicant has undertaken assessments of the potential for significant effects from environmental, social and accessibility changes to local communities across the ES. This assessment has been developed iteratively, through consultation and engagement, and has resulted in changes to the design of the Proposed Development as well as the approach to embedded and additional mitigation to avoid or reduce where practicable the potential for residual adverse effects to the community.
RR-141	Local community	Comment that local people will be forced to move away from the area if the Proposed Development is approved.	The Proposed Development does not result in the displacement of residential property or community land or facilities, as confirmed through **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]**, or the exceedance of environmental thresholds that would render homes uninhabitable or community facilities inaccessible or unviable**.** As set out more fully in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the design of the Proposed Development has evolved to consider views from the Claydon villages and their settings, as the closest settlements to the Site. During the evolution of the design, fields closest to the southern edge of Botolph Claydon were removed from the Order Limits; the location options for the Rosefield Substation

Reference number	Theme	Summary of matter raised	Response
			and BESS locations were refined to reduce potential visual effects for residents of Botolph Claydon and East Claydon; and offsets from residential properties at Calvert Cottages and Catherine Cottages were increased to reduce visibility of the Proposed Development from these properties. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential property from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport.
RR-03, RR-05, RR-30, RR-43, RR-144, RR-157, RR-240, RR-281	Property prices	Comment that property prices would be negatively impacted by the Proposed Development.	A number of members of the public and other stakeholder groups have raised concern about the impact of the Proposed Development on house prices. National Planning Practice Guidance advises that in general, planning is concerned with land use in the public interest. As a result of this, the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be considered as a material planning consideration and is not a matter for assessment under the 2017 EIA Regulations. An assessment of the effects of development on property value was therefore considered to not be required as part of

Reference number	Theme	Summary of matter raised	Response
			the socio-economic assessment within the Environmental Impact Assessment for this Proposed Development. The ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8]** and **Outline LEMP [EN010158/APP/7.6]**. This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis and maintaining the rural separation between local villages. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential property from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport. Visual amenity aside, Part 1 of The Land Compensation Act 1973 (LCA) makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects (including noise, smoke and fumes, but not including loss of value due to a diminished view or visual impact) of the use of development works such as this.

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RR-135	Skills	Question around the ways in which the proposal will support skills development away from oil & gas jobs to renewables and enable cross-sector mobility?	The **Outline ESSCP [EN010158/APP/7.14] [APP-150]** describes how the Applicant would promote opportunities for employment, upskilling and re-skilling for people who are unemployed or employed. This includes people wishing to transfer to renewables from other energy-subsectors or completely different sectors. Theme 1 of the Plan sets out how the Applicant would: • Design and deliver a comprehensive promotional campaign to promote opportunities to work in the renewable energy sector; • Clearly articulate workforce and skills requirements; and • Work with education and skills providers, individual businesses and business representative agencies to design and provide access to training and jobs. The Applicant would welcome opportunities to collaborate with other businesses within and beyond the renewable and wider energy sector in order to create transition pathways into renewables and across the sector.
RR-29, RR-68, RR-71, RR-126, RR-132, RR-138, RR-223, RR-248, RR-266, RR-272, RR-288	TCS Biosciences Ltd	Concerns around the impact of the proposed development on TCS Biosciences Ltd. Specific comments highlighted potential knock-on effects	The Applicant has taken advice from businesses including TCS Biosciences Ltd during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses.

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		to customers such as the NHS. Potential impacts raised include noise, traffic, lighting, land loss, disturbance during construction, biosecurity.	In order to limit disruption to land used by TCS Biosciences, based on this organisation's feedback the Applicant has: • Removed the option consulted on previously for the Rosefield Substation and BESS to be located within Field E23 (now proposed for Solar PV only), thereby reducing perceived operational noise effects; and • Confirmed in the **Design Approach Document [EN10158/APP/5.8] [APP-038]** that at the detailed design stage, the Solar PV module arrangement for Field E23 would be designed to incorporate movement corridors for TCS Biosciences sheep and/or horses to cross the field to access their other adjacent grazing fields.
RR-03, RR-08 RR-29, RR-35, RR-41, RR-66, RR-67, RR-68, RR-71, RR-76, RR-96, RR-126, RR-132, RR-138, RR-141, RR-144, RR-157, RR-167, RR-168, RR-187, RR-192, RR-194, RR-204, RR-219, RR-221, RR-224,	Tenant farmers	Comment that the Proposed Development would negatively affect tenant farmers, and any farm workers. Specific comments elaborated on subsequent loss of farming knowledge in the local area.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2] [APP-057]** considers the potential for effects on tenant farmers and farm operations displaced by the Proposed Development. During the construction phase, changes in land access and availability within the Order Limits would occur as a result of the construction of the Proposed Development. Negotiations have taken place to provide Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to each Tenant/Occupier,

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RR-226, RR-246, RR-247, RR-248, RR-260, RR-269, RR-281, RR-285, RR-288			such that effects on viability of those agricultural businesses would not be adversely affected. In some cases, an agreement has been reached with the Tenant/Occupier to compensate for the use of the tenanted land instead of providing a land swap.
RR-110, RR-238, RR-262	Tourism	Concerns around the impact of the proposed development on local tourism	Effects on the tourist economy have been considered within **ES Volume 2 Chapter 14: Population [EN010158/APP/6.2] [APP-057]**. The tourist economy is determined by the number and type of receptors including attractions and facilities, accommodation and recreational interests that form the areas wider tourist 'draw'. The assessment has reviewed the environmental effects on such receptors relating to landscape and visual, cultural heritage, transport and access, noise and air quality and reports where there is likely to be significant residual effects on amenity across these environmental assessments, and describes mitigation related to them. The assessment takes into account the likelihood of impacts translating to negative perceptions and then translating to visitor behavioural changes in the context of the scale and characteristics of receptors. In most cases, the environmental and accessibility effects on tourism sector receptors is not significant, though it is acknowledged that significant landscape and visual effects

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			would remain for some receptors, following mitigation (Hogshaw Wildlife Park and Claydon House). 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.
Public Rights of Way and permissive footpaths			
RR-06, RR-08, RR-21, RR-29, RR-30, RR-55, RR-67, RR-68, RR-71, RR-84, RR-182, RR-188, RR-209, RR-262, RR-285	Existing footpaths – general comment, including loss of access	Comments about the impacts of the Proposed Development on access to existing footpaths, with specific reference to the North Buckinghamshire Way, and bridleways. Specific comments highlighted potential effect on safety for non-motorised users of the roads network if access to existing off-road network ceases. Comments that there would be a loss of access to open countryside as a	As set out in the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**, there would be no permanent loss of PRoW, either footpaths or bridleways, or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new permissive footpaths within the Order Limits. The new permissive footpaths would be as follows: • A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane; • A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and

Reference number	Theme	Summary of matter raised	Response
		result of the Proposed Development. Concerns around the loss of routes used for walking, cycling and other forms of recreation.	• A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way. The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**. As set out in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the proposed design response includes discounting Solar PV from specific fields within the Order Limits to break up the amount of development along footpaths and to create green infrastructure corridors aligned to them. Where Solar PV development is proposed

Reference number	Theme	Summary of matter raised	Response
			adjacent to footpaths, perimeter fencing would be offset at least 10m from either side of existing PRoW as secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. Larger offsets would also be provided to PRoWs that coincide with the Bernwood Jubilee Way, Midshires Way and North Bucks Way, as secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. These offsets would provide corridors of open space along the existing footpaths to create variation and interest for users. The Bernwood Jubilee Way would have a larger offset of 55m from the proposed Solar PV development to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context. The Midshires Way and North Bucks Way would have a larger offset of 30m from the proposed Solar PV development to allow greater separation from the Proposed Development. In addition, the diversion of PRoW ECL/4/2 to align the PRoW with the field boundaries of Fields E10 and E11 provides greater separation from Rosefield Substation.
RR-68, RR-71, RR-91, RR-105, RR-115, RR-117, RR-133, RR-143, RR-188, RR-197, RR-209, RR-217, 262	Existing footpaths – loss of amenity	Comment that the Proposed Development would affect views from and amenity of the local footpath network. Other comments mention that mitigation measures	Views from the PRoW network within and around the Site, within the 5km study area, are assessed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**. As set out in the **Design Approach Document [EN010158/APP/5.8] [APP-038]**, the proposed design response includes discounting Solar PV development from

Reference number	Theme	Summary of matter raised	Response
		would be insufficient, and that mitigation measures would be incongruous in the landscape.	specific fields within the Order Limits to break up the amount of development along footpaths and to create green infrastructure corridors aligned to them. Where Solar PV development is proposed adjacent to footpaths, perimeter fencing would be offset at least 10m from either side of existing PRoW as secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. Larger offsets would also be provided to PRoWs that coincide with the Bernwood Jubilee Way, Midshires Way and North Bucks Way, as secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**. These offsets would provide corridors of open space along the existing footpaths to create variation and interest for users. The Bernwood Jubilee Way would have a larger offset of 55m from the proposed Solar PV development to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context. The Midshires Way and North Bucks Way would have a larger offset of 30m from the proposed Solar PV development to allow greater separation from the Proposed Development. In addition, the diversion of PRoW ECL/4/2 to align the PRoW with the field boundaries of Fields E10 and E11 provides greater separation from Rosefield Substation. In addition to the offsets from PRoW, which allow views from the PRoWs to be a mosaic of Solar PV development and open space/green infrastructure corridors, green infrastructure proposals have been developed which include approximately

Reference number	Theme	Summary of matter raised	Response
			4,336 linear metres of new structural hedgerows and over 8.5 hectares of proposed native woodland as identified in **Appendix 2** of the **Outline LEMP [EN010158/APP/7.6]** [APP-142]. Both existing and proposed hedgerows would be maintained to maximum heights of between 3-3.5m. The site operator would be responsible for the management of hedgerows. The **Outline LEMP [EN010158/APP/7.6]** [APP-142] provides details of hedgerow management.
RR-133, RR-217	Existing footpaths – loss of amenity	Comment that people would no longer use local PRoWs if the Proposed Development were built.	The Applicant does not expect that people would stop using the PRoW within the Order Limits or the surrounding area as a result of the Proposed Development. As set out in the **Design Approach Document [EN010158/APP/5.8]** [APP-038], with Project Principles 9.1 – 9.4 included under the Strategic Principle of 'Provide new ways to enjoy the countryside', users of PRoW and their amenity have been a consideration throughout the design of the Proposed Development.
RR-51	Existing footpaths – loss of amenity	Comment that a number of PRoW are being developed into Health and Wellbeing walks by Buckinghamshire Council and this would be	The Applicant is aware of the health and wellbeing walks being promoted by Buckinghamshire Council through their Simply Walk scheme, but has not identified any that currently pass through the Order Limits or in areas outside the Order Limits with views towards the Proposed Development. As set out in the **Outline RoWAS [EN010158/APP/7.8]** [APP-144], there would be no permanent loss of PRoW, either footpaths

Reference number	Theme	Summary of matter raised	Response
		impacted by the Proposed Development.	or bridleways, or access to the countryside as a result of the Proposed Development. The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]** considers the effects of the Proposed Development on users of PRoW within the 5km study area.
RR-190	Replacement of PRoW	Comment that no replacement has been proposed for the lost PRoW with views over the Claydon / Winslow and Hogshaw valleys.	As set out in the **Outline RoWAS [EN010158/APP/7.8] [APP-144]**, there would be no permanent loss of PRoW, either footpaths or bridleways, or access to the countryside as a result of the Proposed Development. As described in the **Design Approach Document [EN010158/APP/5.8] [APP-038]** and secured by the **Design Commitments [EN010158/APP/5.9.2] [AS-018]**, large offsets would be provided to PRoWs that coincide with the Bernwood Jubilee Way. These offsets would provide corridors of open space along the existing footpaths to create variation and interest for users. The Bernwood Jubilee Way would have an offset of 55m from the proposed Solar PV development to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context, which includes the Claydon / Winslow and Hogshaw valleys. In addition, the new permissive footpath that connects Splash Lane/Three Points Lane to the Bernwood Jubilee Way would allow a choice of routes in this vicinity and create a new circular route.

Reference number	Theme	Summary of matter raised	Response
Soils and agricultural land			
RR-01, RR-02, RR-04, RR-04, RR-06, RR-07, RR-08, RR-09, RR-10, RR-11, RR-14, RR-16, RR-17, RR-21, RR-22, RR-24, RR-29, RR-30, RR-31, RR-32, RR-33, RR-34, RR-36, RR-37, RR-38, RR-41, RR-45, RR-47, RR-48, RR-52, RR-53, RR-55, RR-56, RR-58, RR-61, RR-63, RR-65, RR-66, RR-67, RR-68, RR-69, RR-71, RR-73, RR-75, RR-76, RR-78, RR-80, RR-82, RR-83, RR-84,	Agricultural land	Comment opposing the use of agricultural land for the Proposed Development, including that this would impact on the UK's food security and that importing more food would have a climate and health impacts.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development, with 1.51% of the site is considered to be BMV land. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development will occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development which would continue food production uses within the Order Limits. Upon decommissioning, the soil would be reinstated to its pre-construction condition as secured in **Outline SMP [EN010158/APP/7.7] [APP-143]**.

Reference number	Theme	Summary of matter raised	Response
RR-85, RR-86, RR-87, RR-89, RR-90, RR-92, RR-94, RR-96, RR-97, RR-98, RR-103, RR-104, RR-105, RR-106, RR-107, RR-108, RR-111, RR-113, RR-116, RR-119, RR-122, RR-125, RR-126, RR-129, RR-130, RR-131, RR-132, RR-134, RR-138, RR-139, RR-140, RR-141, RR-142, RR-145, RR-146, RR-147, RR-150, RR-151, RR-152, RR-155, RR-156, RR-157, RR-158, RR-159, RR-160, RR-162, RR-163, RR-164, RR-166, RR-169, RR-171, RR-172, RR-174, RR-176,			

Reference number	Theme	Summary of matter raised	Response
RR-177, RR-178, RR-182, RR-183, RR-184, RR-185, RR-188, RR-189, RR-190, RR-193, RR-195, RR-197, RR-198, RR-199, RR-204, RR-205, RR-207, RR-210, RR-211, RR-212, RR-214, RR-216, RR-217, RR-218, RR-219, RR-220, RR-221, RR-222, RR-224, RR-225, RR-226, RR-227, RR-233, RR-234, RR-235, RR-236, RR-237, RR-238, RR-245, RR-248, RR-249, RR-251, RR-253, RR-254, RR-255, RR-256, RR-257, RR-259, RR-260, RR-261, RR-265, RR-268, RR-269, RR-271,			

Reference number	Theme	Summary of matter raised	Response
RR-272, RR-279, RR-280, RR-281, RR-282, RR-283, RR-287, RR-288			
RR-68	Agricultural land	Comment that agricultural land can be productive even where it is classified as Grade 3b.	NPS EN-3 (2024) places emphasis on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. However, the Applicant acknowledges that non-BMV land such as Grade 3b can still be productive. It is noted that the potential for sheep and/or cattle grazing within the Order Limits during the operational (including maintenance) phase would continue use of the land for agricultural purposes. Chapter 8 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** provides evidence on the suitability of the

Reference number	Theme	Summary of matter raised	Response
			proposed location for large-scale solar and more widely sets out the urgent need for renewable energy development.
RR-45, RR-71, RR-89, RR-122, RR-169, RR-176 RR-188, RR-209, RR-236, RR-257	Soil	Comment that there would be disruption to soil.	The **Outline SMP [EN010158/APP/7.7] [APP-143]** describes proposed mitigation measures and management strategies to prevent soil disruption.
RR-71, RR-122, RR-169	Soil	Comment expressing concern about disruption to the soil's carbon sequestration function.	During the operation of the Proposed Development, the Solar PV areas would be managed under a grassland system. The grassland would be either grazed or managed using a cutting regime. Under a managed grassland system, the soil would have increased nutrient inputs. Additionally, during operation there would be no agricultural pressure from activities such as farm machinery, cultivation or tillage. The soil structure and mycorrhizal community would be improved as a result. The combination of these activities would lead to an increased soil sequestration potential during the operational (including maintenance) phase.
Traffic and transport			
RR-68, RR-103	AIL routing	Comment that the AIL route would involve	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] (Annex 3)** details the temporary road works required to accommodate AIL traffic.

Reference number	Theme	Summary of matter raised	Response
		dismantling street furniture in Winslow.	Any street furniture works would be temporary, with street furniture removed immediately prior to movements and replaced immediately following the movement of the loads.
RR-95	AIL routing	Comment that the proposed AIL routing would see AILs come off the A41 through the back of Quainton village which is unsuitable.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] (Annex 3)** details that the access route for AIL traffic is via Buckingham and not via Quainton.
RR-19, RR-103, RR-120	Access	Comment that there is limited access to the Order Limits.	Access to the Order Limits is appropriate for the proposed traffic levels. The access route has been discussed in detail with highway officers at Buckinghamshire Council who have not raised any objections to the principal of access.
RR-19, RR-30, RR-68, RR-71, RR-78, RR-93, RR-95	Access points	Comment that the proposed construction access points are unsuitable for large vehicles and pose significant safety risks. Specific comments raised Snake Lane, Lee Road and Claydon Lane, Winslow and East Claydon Road.	The access junctions have been designed specifically to accommodate two-way HGV flows and area illustrated in **Outline CTMP [EN010158/APP/7.5] [APP-141].** The access route to site is suitable for HGV access. Minor enhancements at two locations are noted and detailed in **Outline CTMP [EN010158/APP/7.5] [APP-141].**

Reference number	Theme	Summary of matter raised	Response
RR-105, RR-120	Access points	Comment that only one planned access point from East Claydon Road to the site is not acceptable.	Access from East Claydon Road is only required for AIL access, with no other traffic proposed to use this road. The access is therefore considered entirely suitable.
RR-68, RR-71	Access points	Comment that the junction of Lee Road / Claydon Road has poor visibility and should not be used as a construction access point.	Proposed junction enhancements at this junction would provide improved visibility. These works are detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141].**
RR-68	Access points	Comment that the AILs would enter the proposed sites across fields within EA Flood Zone 3 and which are frequently underwater.	The AIL route would be used infrequently, during construction for delivery of the equipment and potentially for infrequent maintenance/replacement of AIL items throughout the operational (including maintenance) phase. The normal operational route for routine inspection and general maintenance would be from the Orchard Way entrance into Parcel 3. Therefore, this allows for significant flooding periods to be avoided. The design of the AIL access route would also take consideration that it is in a flood zone and minimise impact to access vehicles.
RR-156	Alternative routing	Comment that the dismantled railway line should be temporarily reinstated to provide an	The railway line would require a full re-build not just a reinstatement and the current route presented for AILs is the National Highways registered route. Therefore, the cost to reinstate a length of railway and the impacts that this would

Reference number	Theme	Summary of matter raised	Response
		alternative route for transporting heavy equipment and materials to the eastern part of the Order Limits.	introduce to the Proposed Development would outweigh the other option of bringing the AIL in across the approved transport routes that have already been included within the DCO Application.
RR-03	Botolph Claydon	Comment expressing concern about the impact of construction traffic on Botolph Claydon.	The **Outline CTMP [EN010158/APP/7.5] [APP-141]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** set out the access route for construction traffic. No construction traffic is proposed to pass through Botolph Claydon.
RR-03, RR-06, RR-08, RR-11, RR-14, RR-19, RR-24, RR-29, RR-32, RR-33, RR-34, RR-35, RR-37, RR-38, RR-41, RR-43, RR-45, RR-47, RR-55, RR-58, RR-63, RR-67, RR-68, RR-69, RR-71, RR-73, RR-76, RR-79, RR-80, RR-83,	Damage to the local road network	Comments expressing concern that construction vehicles would damage the condition of the local road network. Specific comments noted local experience of damage to the surfaces of the road from other major projects in the area.	The **Outline CTMP [EN010158/APP/7.5] [APP-141]** sets out a "Wear and Tear" Agreement with Buckinghamshire Council to ensure that the public highway is not subject to damage and that the Applicant is responsible for any damages caused by construction traffic.

Reference number	Theme	Summary of matter raised	Response
RR-86, RR-92, RR-93, RR-96, RR-103, RR-104, RR-105, RR-116, RR-122, RR-123, RR-125, RR-126, RR-131, RR-135, RR-140, RR-145, RR-153, RR-156, RR-166, RR-167, RR-166, RR-173, RR-177, RR-181, RR-185, RR-187, RR-188, RR-189, RR-190, RR-193, RR-195, RR-205, RR-206, RR-207, RR-209, RR-214, RR-216, RR-217, RR-219, RR-225, RR-234, RR-238, RR-242, RR-247, RR-258, RR-260, RR-261, RR-262, RR-274, RR-283, RR-287			

Reference number	Theme	Summary of matter raised	Response
RR-03, RR-05, RR-32, RR-35, RR-37, RR-43, RR-55, RR-65, RR-67, RR-79, RR-83, RR-92, RR-110, RR-117, RR-120, RR-122, RR-126, RR-132, RR-143, RR-145, RR-156, RR-163, RR-166, RR-167, RR-176, RR-177, RR-181, RR-184, RR-188, RR-190, RR-196, RR-206, RR-207, RR-209, RR-215, RR-222, RR-225, RR-234, RR-235, RR-236, RR-238, RR-243, RR-244, RR-247, RR-258, RR-262, RR-271, RR-285, RR-286	Disruption to the local area	Comment that there would be disruption during the construction phase for neighbouring residents, including road closures and diversions, as well as traffic congestion. Specific comments mentioned subsequent impacts on local schools and businesses such as Claydon House, and impacts to emergency services access.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** details the traffic increases that can be expected during the construction period. No road closures are anticipated. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** notes that all traffic impacts following the implementation of mitigation measures set out in the **Outline CTMP [EN010158/APP/7.5] [APP-141]** are not significant. This plan also sets out measures to help with emergency access. No schools are directly located on the construction access route and the National Trust's website for Claydon House notes that the recommended access route is as follows: "signposted A413 (Buckingham), A41 (Waddesdon crossroads). M40 junction 9 (Bicester) follow A41, turn off to Grendon Underwood and Calvert, signposted from Calvert Crossroads". This route from the A41 is not used by construction traffic as noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. As such, there is no impact to visitors using the signposted route.

Reference number	Theme	Summary of matter raised	Response
RR-35, RR-131, RR-141, RR-143, RR-219, RR-247, RR-258	Enforcement	Concern that construction workers will not adhere to the construction management plan and/or drive recklessly, and that there will be no way to enforce this/previous enforcement measures have not worked.	The **Outline CTMP [EN010158/APP/7.5]** [APP-141] sets out the monitoring and enforcement protocols to ensure compliance. As part of the DCO, these measures are contractually and legally enforceable to any staff member working on the Site. The proposed access route avoids traffic passing through sensitive villages such as Botolph Claydon, Quainton and East Claydon.
RR-03, RR-06, RR-35, RR-67, RR-92,	General comment – impact on villages	Comments that there would be negative impact on surrounding villages due to construction traffic. Specific comments mention Botolph Claydon.	**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058] notes that all traffic impacts following the implementation of mitigation measures are predicted to be not significant.
RR-13, RR-15, RR-30, RR-33, RR-34, RR-43, RR-51, RR-55, RR-67, RR-78, RR-79, RR-80, RR-84, RR-91, RR-110, RR-116, RR-117, RR-120, RR-121, RR-122,	General comment - transport	Comments opposing the Proposed Development due to the amount of traffic generated by the Proposed Development.	**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058] sets out all traffic impacts following the implementation of mitigation measures. No significant or long-term effects are predicted as a result of the proposed construction traffic flows.

Reference number	Theme	Summary of matter raised	Response
RR-126, RR-132, RR-133, RR-138, RR-153, RR-182, RR-185, RR-189, RR-196, RR-204, RR-206, RR-208, RR-215, RR-231, RR-235, RR-241, RR-247, RR-248, RR-262			
RR-52	Mitigation	Comment that there is a lack of proposed mitigation measures to reduce impacts of traffic associated with the Proposed Development.	Mitigation measures are set out in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058] which includes all of the measures noted in the extensive **Outline CTMP [EN010158/APP/7.5]** [APP-141]. Implementation of this Plan would be secured as a requirement of the DCO, should consent be granted.
RR-34, RR-181	Operational traffic	Comment that traffic needed to maintain storage sites and collector compounds would affect the condition of the local road network.	The traffic volumes for the operational phase are set out in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]. Traffic volumes are not significant and would not have a significant impact on the condition of the road network.
RR-08, RR-14, RR-30, RR-35,	Road safety	Impact of construction on the safety of other road	Measures to ensure safety for all road and path users are set out in the **Outline CTMP [EN010158/APP/7.5]** [APP-141].

Reference number	Theme	Summary of matter raised	Response
RR-43, RR-45, RR-58, RR-71, RR-79, RR-116, RR-128, RR-141, RR-143, RR-166, RR-167, RR-173, RR-174, RR-182, RR-185, RR-188, RR-190, RR-206, RR-207, RR-209, RR-219, RR-238, RR-242, RR-248, RR-264, RR-271, RR-283, RR-288		users during the construction phase due to increased traffic, such as pedestrians, equestrians and/or cyclists. Specific comments mention issues with speeding from HGVs associated with other major projects in the area through local villages.	No significant road safety impacts are predicted as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and the **Outline CTMP [EN010158/APP/7.5] [APP-141]** both note that the construction route does not pass through any of the nearby villages.
RR-06, RR-08, RR-11, RR-14, RR-19, RR-24, RR-29, RR-30, RR-32, RR-41, RR-43, RR-45, RR-47, RR-58, RR-67, RR-68, RR-69, RR-71, RR-78, RR-79, RR-80, RR-86, RR-87, RR-92,	Suitability of the local road network	Concern that the local road network is unsuitable for construction traffic and/or HGVs. Related comments also noted the poor condition of footpaths along local roads which would exacerbate safety concerns.	Engagement on the access route has been undertaken with Buckinghamshire Council in detail. No in principal objection to the access route has been made by the Council as local highways agency. Measures to provide road improvements are included in the **Outline CTMP [EN010158/APP/7.5] [APP-141]** and include a commitment to improve the road condition of Snake Lane. There are no adjoining footpaths on the access route. Any concerns relating to the condition of other footways is a matter for the Council.

Reference number	Theme	Summary of matter raised	Response
RR-96, RR-104, RR-105, RR-115, RR-116, RR-117, RR-123, RR-125, RR-126, RR-128, RR-132, RR-135, RR-138, RR-140, RR-142, RR-143, RR-145, RR-146, RR-151, RR-152, RR-153, RR-154, RR-156, RR-158, RR-162, RR-164, RR-166, RR-172, RR-174, RR-177, RR-182, RR-188, RR-189, RR-190, RR-195, RR-204, RR-206, RR-209, RR-216, RR-217, RR-220, RR-225, RR-226, RR-234, RR-235, RR-238, RR-239, RR-247, RR-248, RR-249, RR-254, RR-256, RR-260, RR-261,			

Reference number	Theme	Summary of matter raised	Response
RR-262, RR-265, RR-271, RR-278, RR-280, RR-284, RR-287			
RR-135	Suitability of the local road network	Currently Quainton Road is nearly all single track and absolutely not suitable for lorries of the number proposed to build this solar farm, let alone the numbers of cars for workers and contractors required 6 days a week, twice a day.	None of the proposed access route is single track and two-way traffic can be accommodated. Minor junction enhancements are proposed at two locations and are detailed in the **Outline CTMP [EN010158/APP/7.5] [APP-141]**.
Waste			
RR-204, RR-241, RR-248, RR-288	General comment	General concerns that the proposal would result in increased contamination	During the construction, operation (including maintenance) and decommissioning phases of the Proposed Development, measures would be in place, as secured in the **Outline CEMP [EN010158/APP/7.2] [APP-138]**, **Outline OEM [EN010158/APP/7.3] [APP-139]** and **Outline DEMP [EN010158/APP/7.4] [APP-140]** which include a management plan for dealing with hazardous materials, and actions to follow in the unlikely event of any accidental release of potentially contaminative materials. These mitigation

Reference number	Theme	Summary of matter raised	Response
			measures would protect both soil and groundwater from potential contamination, preventing migration into geological units (see also **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2]** [APP-054] and **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2]** [APP-055]. The **Outline Drainage Strategy [EN010158/APP/7.11]** [APP-147] provides detail on design principles which would prevent pollution from the BESS (either chemicals or fuels associated with construction or operation (including maintenance) activities, or contamination resulting from fire-fighting activities) entering the wider environment. The **Outline BSMP [EN010158/APP/7.9]** [APP-145] also includes measures for protecting groundwater from contamination, in case of any incidents associated with the BESS.
Water			
RR-247	Approach to assessment	Comment that no evidence has been provided to demonstrate how the water demand the Proposed Development requires would be met without impacting local supply or sustainability.	The Applicant and Anglian Water Services (AWS) have had regular ongoing discussions to seek to co-ordinate the Proposed Development and discuss the requirements for potable and raw water supplies. These discussions have deemed that connections are possible, and discussions would continue through the detailed design stages of the Proposed Development. A pre-planning enquiry Water Supply Assessment has been undertaken with Anglian Water. Provisional construction and

Reference number	Theme	Summary of matter raised	Response
			operational flow rates have been shared and discussions have taken place. These provisional flows have been modelled and provisionally approved by Anglian Water through this Water Supply Assessment. It is worth noting that the operational demand for the Proposed Development is very low compared to other land uses. A Draft Statement of Common Ground will be submitted at Deadline 1 to provide a summary of discussions with Anglian Water Services that have taken place.
RR-45, RR-68, RR-71, RR-80, RR-122, RR-194, RR-277	Flood risk	Comments expressing concern that the Proposed Development would increase flood risk.	The Proposed Development has been designed to ensure there is no increase in flood risk. The Solar PV modules would not increase the impermeable area, and surface water would continue to drain naturally across the Site. Paragraph 2.10.76 of NPS EN-3 states: '*as solar PV panels will drain to the existing ground, the impact will not, in general, be significant*.' Any ancillary infrastructure would be provided with appropriate drainage measures, ensuring that post-development runoff rates and volumes do not exceed existing conditions. As such, the proposal would not increase flood risk on-site or elsewhere. For more information, please see the **Outline Drainage Strategy [EN010158/APP/7.11] [APP-147]**.
RR-128	Pollution	Concerns around water pollution in local villages, with specific reference to	Concerns regarding potential water pollution affecting Granborough and North Marston are acknowledged. The Proposed Development would not introduce significant

Reference number	Theme	Summary of matter raised	Response
		Granborough and North Marston.	sources of pollution, and the Proposed Development would retain the Site's existing permeable characteristics. Appropriate construction and operational controls would be implemented to manage surface water and prevent sediment or contaminants entering local watercourses (as secured within **Outline CEMP [EN010158/APP/7.2] [APP-138]**). The potential for water pollution from firewater runoff associated with the BESS would be managed through the measures secured in the **Outline BSMP [EN010158/APP/7.9] [APP-145].** As a result, the Proposed Development would not be expected to adversely affect water quality in nearby villages.
RR-277	Run-off	Comments around the Proposed Development's impact on increased run-off in local fields	The Proposed Development has been designed to ensure there is no increase in flood risk. The Solar PV modules would not increase impermeable area, and surface water would continue to drain naturally across the site. Paragraph 2.10.76 of NPS EN-3 states: '*as solar PV panels will drain to the existing ground, the impact will not, in general, be significant*.' Any ancillary infrastructure would be provided with appropriate drainage measures, ensuring that post-development runoff rates and volumes would not exceed existing conditions. As such, the Proposed Development would not increase runoff to the local fields.

Reference number	Theme	Summary of matter raised	Response
RR-171, RR-176, RR-257	Run-off	Comment expressing concern that soil compaction would increase the risk of run-off.	The Site would remain predominantly permeable and, in many cases, ground conditions are expected to improve over time through grassland management and grass sword establishment as set out and secured in the **Outline SMP [EN010158/APP/7.7] [APP-143]** and **Outline LEMP [EN010158/APP/7.6] [APP-142]**. Accordingly, the Proposed Development would not increase surface water runoff or flood risk.
RR-68	Run-off	Comment expressing concern that soil stripping would lead to run-off.	The Proposed Development would not involve widespread soil stripping; ground disturbance would be limited to discrete areas for panel supports and ancillary infrastructure. Where temporary stripping is required during construction, soils would be carefully managed, stored, and reinstated in accordance with best practice to maintain soil structure and permeability as set out and secured in the **Outline SMP [EN010158/APP/7.7] [APP-143]**. The Site would remain predominantly permeable, and the Proposed Development would not result in increased surface water runoff or flood risk.
RR-238	Water movement	Comment that the Proposed Development would result in changes in water movement.	The Proposed Development would not materially alter existing drainage patterns, as the Site would remain largely permeable with limited ground disturbance. Surface water would continue to drain naturally across the Site, and any minor localised changes would be managed through appropriate layout and construction practices. As such, the Proposed Development

Reference number	Theme	Summary of matter raised	Response
			would not result in adverse changes to water movement or increase flood risk.
Misc.			
RR-11, RR-16, RR-24, RR-29, RR-35, RR-37, RR-43, RR-62, RR-96, RR-102, RR-104, RR-106, RR-131, RR-132, RR-140, RR-141, RR-143, RR-144, RR-157, RR-171, RR-182, RR-198, RR-207, RR-209, RR-214, RR-219, RR-249, RR-255, RR-258, RR-269, RR-274, RR-287, RR-287	Funding	Comments that the Applicant is motivated by profit.	The Applicant is bringing forward the Proposed Development to meet an urgent national need for clean, secure sources of electricity. Further information on this is provided within the **Statement of Need [EN010158/APP/5.6]** [APP-036].
RR-146	Funding	Comment that projects of this nature do not generate a good financial return.	The Applicant does not consider that this is a material planning consideration.

Reference number	Theme	Summary of matter raised	Response
RR-107	Funding	Comment questioning whether the Proposed Development has adequate funding.	A **Funding Statement [EN010158/APP/4.2]** [APP-017] has been submitted to demonstrate how the Applicant would fund the construction of the Proposed Development.
RR-17, RR-156, RR-255, RR-260, RR-272	Procurement	Comment expressing concern about supply chain ethics for the Proposed Development.	Section 3.5 Ethical Procurement, of the **Outline ESSCP [EN010158/APP/7.14]** [APP-150] sets out the key tenets of how ethical procurement would be ensured in relation to delivering the Proposed Development and how doing business in an ethical way is of utmost importance to the Applicant. The Applicant is committed to working to ensure sustainable, ethical practice across supply chains, and would not tolerate fraud, corruption or abuse of human rights. The Applicant recognises that Modern Slavery and human trafficking are growing global concerns and consistently strives to ensure that its own operations, and those of the supply chains, are appropriately evaluating the risks of Modern Slavery and human trafficking. The Applicant recognises the increased risk of Modern Slavery in the solar energy supply chain, particularly due to the complexities associated with the manufacture of solar PV panels. These risks are taken seriously, and a rigorous approach is applied to ensure that all supply chain partners align with the Applicant's values and legal obligations, including compliance with the Modern Slavery Act 2015.

Reference number	Theme	Summary of matter raised	Response
			There are three main aspects to the supply chain management framework: • Modern Slavery risk evaluation in operations and supply chains • Sustainable procurement and due diligence process • Certification and Environmental and Social Governance audits for solar panel suppliers. This includes production site audits and ongoing monitoring, whereby suppliers are subject to ongoing regular review by the EDF Group's Corporate Audit Team. The above measures would be secured through the Detailed Plan and carried through into the detailed design and delivery stages. These would be embedded into the procurement strategy and contractual frameworks to ensure enforceability.

Appendix 1: Cumulative Waste Study

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1. Cumulative Waste

1.1. Introduction

1.1.1. This study has been undertaken in response to the Buckinghamshire Council Relevant Representation comment received on 12 December 2025 for the proposed Rosefield Solar Farm (hereafter referred to as the 'Proposed Development'). The Buckinghamshire Council's comments identifies concerns regarding cumulative waste effects, including baseline waste and landfill capacity, cumulative impacts on waste arising from other local solar schemes, and the potential for local waste management infrastructure to be unable to accommodate solar panel waste at decommissioning..

1.1.2. This cumulative study applies a similar approach to that undertaken for the Springwell Solar Farm EN010149, Tillbridge Solar Project EN010142 and Gate Burton Energy Park EN010131, considering the potential cumulative impact on waste.

1.2. Study Area

1.2.1. For the purposes of this study, the South East region is used as the study area for non-hazardous waste rather than just Buckinghamshire, acknowledging that waste is not always processed within the Waste Planning Authority where it is generated and may instead be managed at a regional level.

1.3. Baseline

1.3.1. The data to inform the baseline for this study has been derived from the Environment Agency on landfill capacity in 2024 in the South East[1].

1.4. Future Baseline

1.4.1. There is no published data on future landfill capacity, and accurate prediction of void capacity over the lifetime of the Proposed Development is not feasible, given its reliance on a range of uncertain, variable and external factors, the majority of which would be beyond the control of the project or the local authority.

1.4.2. This study operates under the assumption that future landfill void capacity will remain comparable to current levels. Additionally, it is assumed that the Waster Planning Authority will plan and allocate sufficient landfill

[1] Remaining Landfill Capacity - data.gov.uk

capacity to meet future needs, in accordance with Section 3 of the National Planning Policy for Waste.

1.5. Study Assumptions

1.5.1. Two assumptions around recovery rates have been used for the purposes of this study to ensure a worst-case scenario has been undertaken:

- A “realistic worst case” of 70% recovery rate, based on current and likely future recovery rates. Recovery is defined as reuse, recycling and recover. This is considered appropriately conservative;
- An “absolute worst case” based on the assumption that all construction and demolition (C&D) waste goes to landfill. This is considered to be extremely unlikely to occur.

1.5.2. Waste estimates have been generated by using the following assumptions based on project experience and the approach taken on similar projects:

- Estimating Solar PV module waste based on a nominal module capacity of 0.65kW and weight of 35kg;
- Assuming that the ratio of other waste to Solar PV module waste for the Proposed Development is based on similar projects, 35kg of total waste by mass comprises Solar PV modules, and the remaining 65% is other waste.

1.5.3. For the purposes of this cumulative study, it is assumed that all schemes are decommissioned over a single three-year period and that all waste is non-hazardous.

1.6. Cumulative Waste Study

1.6.1. The approach to the study of the inter-project cumulative effects of waste has been informed by the approaches by other solar DCOs that have been through Examination, including Springwell Solar Farm, Tillbridge Solar Farm and Gate Burton Energy Park.

1.6.2. The study considers the developments within the Zone of Influence (ZoI) which comprises of any solar developments within 10km of the Proposed Development.

1.6.3. The cumulative solar farm developments have been derived from the Buckinghamshire Council planning portal and align with the criteria outlined in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2] [APP-060]** in defining the short list for inter-project cumulative effects.

1.6.4. Using the study assumptions set out in Section 1.5 of this study, a study of the inter-project cumulative effects of waste has been undertaken. The outputs of the study area are detailed below in **Table 1.**

Table 1: Cumulative Waste Study

Scheme	Size (MW)	Estimated PV Panel waste (tonnes)	Estimated Other waste (tonnes)	Estimated Total waste (tonnes)
Rosefield Solar Farm	334.1	19,947	90,744	110,691
Tuckey Solar Farm (19/00983/APP)	25	1,346	2,500	3,846
Calvert Solar Park (CM/0016/21)	16	862	1,600	2,462
Longbreach Solar Farm (25/01865/APP)	49.9	2,687	4,990	7,677
Padbury Brook Solar Farm (22/03873/F)	44	2,369	4,400	6,769
Total	184.9	27,211	104,234	131,445
Cumulative Waste at Decommissioning				
Cumulative Waste				
Total waste from cumulative schemes		27,211	104,234	131,445
Total waste from cumulative schemes (m^3) (assuming density of 0.31t/m^3 for PV panels and 1.6t/m^3 for other waste		87,777	65,146	152,923
Waste to landfill, m^3 (realistic worst case estimate with 70% recovery)		26,333	19,544	45,877
Waste to landfill, m^3 (absolute worst-case estimate - assuming zero recycling/recovery)		87,777	65,146	152,923

Rosefield Waste Annually

Total waste from the Proposed Development (m3) (assuming density of 0.31t/m3 for PV panels and 1.6 t/m3 for other waste	64,345	56,715	121,060
Waste to landfill, m3 (realistic worst case estimate with 70% recovery)	19,304	17,015	36,318
Waste to landfill, m3 (absolute worst-case estimate – assuming zero recycling/recovery)	64,245	56,715	121,060
Current Baseline			
Regional landfill capacity (m3)[2]			41,544,623
Regional C&D waste arisings (tonnes)[3]			4,262,557
Buckinghamshire waste arisings (tonnes)[4]			2,633,913
Comparison Against Current Baseline - Rosefield	**PV panel waste (%)**	**Other waste (%)**	**Total waste (%)**
% of regional landfill capacity required for Proposed Development (realistic worst case estimate with 70% recovery)	0.05	0.04	0.09

[2] Environment Agency (2025) '2024 Remaining Landfill Capacity' Available online at: Remaining Landfill Capacity - data.gov.uk
[3] Environment Agency (2025) '2024 Waste Data Interrogator' Available online at: 2024 Waste Data Interrogator - data.gov.uk
[4] Environment Agency (2025) '2024 Waste Data Interrogator' Available online at: 2024 Waste Data Interrogator - data.gov.uk

% of regional landfill capacity required for Proposed Development (absolute worst case estimate)	0.15	0.14	0.29
% of regional C&D waste arisings	0.45	0.04	0.49
% of Buckinghamshire C&D waste arisings	0.73	0.65	1.38
Comparison Against Current Baseline – Cumulative solar schemes			
% of regional landfill capacity required for cumulative solar schemes (realistic worst case estimate with 70% recovery)	0.06	0.05	0.11
% of regional landfill capacity required for cumulative solar schemes (absolute worst-case estimate)	0.21	0.16	0.37
% of regional C&D waste arisings	0.62	0.46	1.08
% of Buckinghamshire C&D waste arisings	1.00	0.74	1.74

1.7. Summary

1.7.1. The study demonstrates that under the absolute worst-case scenario, cumulative impacts would result in 0.37% of regional landfill capacity to be required for the Proposed Development and other existing development and/or approved developments. Under the realistic worst case 0.11% of regional landfill capacity would be required.

1.7.2. Assuming decommissioning of the Proposed Development and other existing development and/or approved developments occurs during a single three-year period, annual waste from the cumulative schemes would equate to approximately 0.36% waste arising in the South East and 0.58% Construction & Demolition waste arisings in Buckinghamshire.

1.7.3. It is anticipated that private sector waste companies will develop these 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. 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 environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery.

1.7.4. Prior to the operation (including maintenance) and decommissioning phases, further details on the types of waste and waste forecast, along with details on the amount of recycled/landfill waste that is anticipated, will be included in the detailed Operational Environmental Management Plan and Decommissioning Environmental Management Plan. These, alongside the resultant location of any waste and the capacity of these waste facilities, will be discussed and submitted for approval with the relevant local authority prior to the start of the operation (including maintenance) and decommissioning phases of the Proposed Development.

Rosefield
Solar Farm

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