



AtkinsRéalis



# Rosefield Solar Farm (EN010158)

**Rosefield Solar Farm - Local Impact Report Addendum  
Population and Human Health**

Buckinghamshire Council

April 2026

# 1. Introduction

This Addendum has been prepared to sit alongside and supplement Buckinghamshire Council's Local Impact Report (LIR) **[REP1-112]** submitted as part of Deadline 1. As per paragraph 4.6.20 of the submitted LIR at Deadline 1, Buckinghamshire Council reserved the right to review a separate report being prepared by the Applicant in relation to a stand-alone health assessment. Buckinghamshire Council has now reviewed the Health Effects Report **[REP1-056]** submitted into the Examination by the Applicant at Deadline 1. This Addendum provides an updated Population and Human Health local impact section, having had regard to the Health Effects Report **[REP1-056]**. The ExA and Secretary of State are invited to treat this addendum as part of the LIR for the purposes of s.104(2)(b) of the Planning Act 2008.

# 1.1 Population and Human Health

## Summary

1.1.1 The Council raised in its Relevant Representation [RR-026] that the Environmental Statement, taken as a whole, does not provide a clear or integrated assessment of likely significant effects on population and human health. The Council ~~remains of~~ expressed the view that such work should be done, and noted~~s~~ that the ExA had~~s~~ invited the Applicant to produce such an assessment. ~~The Applicant submitted a Health Effects Report into the Examination as Annex A to the Health and Well-being Summary Report Appendix to the ES [REP1-056] at Deadline 1. The Council reserved . As such, the Council has provided a limited responses now, while expressly reserving the opportunity to add to this LIR and comment on the consolidated population and human health assessment when it becomes became available. This LIR has therefore now been revised to reflect the Council's interpretation of the content of the Health Effects Report [REP1-056].~~

## Key policies/compliance

Table 4-5 - Policies relevant to Population and Human Health

Document	Relevant sections/paragraphs
Overarching NPS for Energy (EN-1)	Paragraphs 4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6, 4.4.7,4.4.8
NPS for Renewable Energy Infrastructure (EN-3)	Paragraphs 2.10.40, 2.10.44
NPPF (December 2024)	Paragraphs: 96, 192(e), 135(f)
Vale of Aylesbury Local Plan (VALP)	BE3 Protection of the amenity of residents C3 Renewable Energy C4 Protection of public rights of way S1 Sustainable development for Aylesbury Vale T7 Footpaths and cycle routes

## Policy Detail

### Overarching NPS for Energy (EN-1)

- Paragraphs 4.4.1 and 4.4.2 of NPS EN-1 states “[e]nergy infrastructure has the potential to impact on the health and well-being (“health”) of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people’s health”. Para 4.4.2 goes on to provide a number of examples of direct impact:
- *“increased traffic,*
- *air or water pollution*
- *dust, odour*
- *hazardous waste and substances*
- *noise*
- *Exposure to radiation*
- *Increase in pests”*

1.1.2 New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity (paragraph 4.4.3).

1.1.3 Requirements of the Applicant’s assessment are contained in paragraphs 4.4.4 – 4.4.6.

1.1.4 In terms of the Secretary of State’s decision making, paragraph 4.4.7 states that, “[g]enerally, 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”.

1.1.5 Paragraph 4.4.8 states “not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise”.

### NPS for Renewable Energy Infrastructure (EN-3)

1.1.6 Paragraph 2.10.40 of NPS EN-3 specifically recognises that solar developments may affect the provision of PRoWs, and access, so, under Paragraph 2.10.44 of NPS EN-3, applicants should consider and maximise opportunities to facilitate the enhancement of the PRoW network, with further opportunities provisioned to allow the public to cross the development.

NPPF (December 2024)

- 1.1.7 Paragraph 96 of the NPPF outlines: “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
  - b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
  - c) *enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*
- 1.1.8 As is addressed in sections of the LIR above and below, para 105 of NPPF provides for decision to “protect and enhance public rights of way and access”.
- 1.1.9 Paragraph 129 of the NPPF states: “Planning policies and decisions should support development that makes efficient use of land, taking into account: ...e) the importance of securing well-designed, attractive and healthy places”.
- 1.1.10 Paragraph 135 of the NPPF establishes that, among other things, planning decisions should ensure that developments “(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

VALP (2013-2033)

- 1.1.11 Policy BE3 (Protection of the amenity of residents) of the VALP makes clear that planning permission would not be granted for developments that unreasonably harm any aspect of an existing or future resident’s amenity
- 1.1.12 Policy C3 (Renewable Energy) encourages the deployment of renewable energy development provided there are no unacceptable adverse impacts on matters which include but are not limited to: landscape designations; visual impacts on local landscapes and residential amenity.
- 1.1.13 Policy C4 (Protection of public rights of way) of the VALP confirms that the Local Planning Authority will protect PRowS to maintain integrity and connectivity and that planning permission will not usually be granted where unacceptable harm to the operation of PRowS would arise

- 1.1.14 In a similar vein to Paragraph 39 of the NPPF, Policy S1 (Sustainable development for Aylesbury Vale) of the VALP makes clear that the Local Planning Authority's stance is that they will work proactively with applicants to find solutions to improve economic, social, and environmental conditions in the area.
- 1.1.15 The Policy T7 (Footpaths and cycle routes) VALP outlines the requirements of developments where implications to footpaths and cycle route networks are anticipated. A key criterion of this Policy is the need for developments to provide direct and convenient pedestrian routes that connect to the existing pedestrian network and strategic routes.

### Commentary

- 1.1.16 The Council has raised in its Relevant Representation **[RR-026]** that the Environmental Statement, taken as a whole, does not provide a clear or integrated assessment of likely significant effects on population and human health. Relevant health determinants are addressed separately across the Environmental Statement chapters including Air Quality **[APP-049]**, Landscape and Visual **[APP-053]**, Noise and Vibration **[APP-056]**, Traffic and Access, and Population **[APP-057]**, then summarised qualitatively, rather than through a health lens. In this form, the Health, and Wellbeing Summary Statement **[APP-083]** does not set out the methods, evidence or assessment needed to support a reasoned conclusion on overall significance of health effects for defined populations, undermining confidence in how the Applicant has derived the stated conclusions.
- 1.1.17 The Applicant's response to the Relevant Representations **[RR-026]**, which is provided in **[PDA-006]** has been reviewed by the Council. It is acknowledged that clarification is provided relating to discipline-specific methodologies. Further, the Council considers that the Health Effects Report provided as Annex A to the updated Summary at Deadline 1 **[REP1-056]** represents a clear improvement compared to the earlier submission and partially addresses the concerns previously raised by Buckinghamshire Council **[RR-026]** and the Examining Authority **[PDA-006]**. The introduction of Annex A now brings together, in a single location, the health-related conclusions drawn from the Environmental Statement topic chapters, identifies relevant health determinants and pathways, and provides a clearer audit trail of how health significance judgements have been reached.
- 1.1.18 However, the Council maintains that the Health and Wellbeing Summary Statement and Annex A **[REP1-056 APP-083]** does not, in its current form, address the following:
- ~~• provide a consolidated Population and Human Health assessment.~~
  - ~~• apply the former IEMA (now ISEP) Health in EIA methodology.~~
  - Demonstrably apply the IEMA (now ISEP) social impact assessment in EIA methodology (October 2025)
  - Consistently identify vulnerable or high-exposure geographic sub-populations through demographic analysis,
  - Provide sufficiently focused assessment to enable reporting on differential health effects for high-exposure geographic sub-populations, as standalone receptors, separately from those experienced by the wider population,

- Sufficiently progress assessment and potential mitigation that has been suggested to the Applicant (for example, but not limited to, suggestions made by Preston Farms/TCS Biosciences through **[REP1-133]** and implicitly within the Examining Authority question Q1.4.10), which Buckinghamshire Council considers could potentially enable significant residual effects to be reduced,<sup>1</sup> or
- Afford the assessment of significance of health effects of the Proposed Development equivalent prominence within the ES as a whole, through inclusion as an Annex to an Appendix **[REP1-056]** as opposed to a standalone chapter within the ES.

1.1.19 Buckinghamshire Council further notes that the Non-Technical Summary **[APP-077]**, as originally submitted, did not include any conclusions on the health and wellbeing effects of the Proposed Development, and therefore did not report the significance of health effects. **[APP-077]** does not appear to have been updated by the Applicant since submission and therefore does not reflect the updated health assessment material now provided in Appendix 5.5 and Annex A (Health Effects Report) **[REP1-056]**. The Council considers that the ES Non Technical Summary **[APP-077]** should be updated to include a clear summary of the health and wellbeing assessment conclusions, including the significance of health effects. This is necessary to ensure that health assessment findings and the reporting of significant residual effects is appropriately and consistently reflected within the ES-wide summary documentation.

- ~~present health-specific significance criteria; or~~
- ~~integrate topic outputs into an overall judgement on likely significant health effects, through a human health lens.~~

1.1.20 ~~Buckinghamshire Council supports the requirement of the ExA, as set out in its s.89(3) letter to the Applicant, dated 09 January 2026 **[PD-006]**, "that the assessment of, and conclusions on, likely significant effects on human health be brought together in one coherent document, either within revised ES chapters or a standalone report. The Applicant is required to update the ES accordingly and provide a timeframe for submission". Further, the Environmental Statement should make it clear whether effects are significant or not and identify the degree to which any proposed mitigation measures would reduce the significance of effects. The Council notes that the Applicant has indicated that this report will be prepared and is to be submitted to the Examination at Deadline 1 (**[AS-035]**, page 31). The Council welcomes the Applicant's receptiveness to this requirement.~~

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<sup>1</sup> This matter is addressed in more detail in respect of Preston Farms / TCS Biosciences in the Council's response to ExQ1, at Q1.17.1.

- 1.1.21 ~~Pending~~ **Following** the opportunity to review the separate report **[REP1-056]** ~~being prepared by the Applicant,~~ the Council **remains of the view that** ~~is not yet able to confirm whether~~ the Applicant's approach **does not yet fully satisfy** ~~satisfies~~ the expectations of NPS EN-1 (including section 4.3 on human health, wellbeing and cumulative impacts) or relevant EN-3 considerations for solar development. **The Council is of the view that** ~~, nor whether~~ the combined effects of air quality, construction noise, landscape change, PRoW disruption and wider community effects have **not** been assessed adequately, **specifically** for the **high exposure geographic sub-populations** ~~affected populations~~ in Buckinghamshire, **which is necessary to fully accord** ~~in accordance~~ with the ISEP best practice guidance for **both health and social impact assessment in EIA.**
- 1.1.22 Buckinghamshire Council is not satisfied that residual significant landscape-related and cumulative wellbeing effects have been addressed, nor that the assessment adequately distinguishes geographically higher-exposure sub-populations who may be more likely to experience those effects due to their higher sensitivity to change than the wider population. These issues remain central to Buckinghamshire Council's health and wellbeing position on the Proposed Development, which is that the Applicant should propose further avoidance and targeted mitigation to address the significant residual effects reported; and complete and report the assessment of human health effects for the geographically sensitive sub-populations, as specific receptors, leading to further targeted mitigation as appropriate. As currently drafted, Buckinghamshire Council does not support the Applicant's concluding statement at para 9.1.23 **[REP1-056]** and asserts that there are further mitigation routes that should be explored, through further assessment work.
- 1.1.23 Pending receipt and review of the **Applicant's response to the Council's updated LIR, alongside the Applicant's response to the Council's answers to the Examining Authority's questions (notably Q1.13.1 and Q1.7.1), which are expected to be made available at Deadline 3, consolidated assessment,** the Council must therefore reserve its position and will provide further comment at **subsequent Deadlines.** ~~(to be part of this LIR) at the next deadline once the separate report, required from the Applicant by the ExA, is made available.~~
- 1.1.24 Population and Human Health Local Impacts: **Negative**