



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Rosefield Solar Farm – Buckinghamshire Council's Comments
to the Applicant's Updated Deadline 1 Documents**

Buckinghamshire Council

April 2026

Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
REP1-006	Rosefield Energyfarm Limited	2.4.3 Streets, Rights of Way and Access Plans (Rev 3)	See comments on 7.8.2 Outline Rights of Way & Access Strategy (RoWAS) (Clean) (Rev 2) below.
REP1-009	Rosefield Energyfarm Limited	3.1.3 Draft Development Consent Order (Tracked) (Rev 3)	Arboriculture: The revisions do not materially alter the Council's arboricultural position. Articles 40 and 41 remain broadly drafted and are not tied to a clearly identified schedule of trees likely to be affected. The Council's concern remains that the breadth of these powers is not yet matched by a sufficiently precise and robust arboricultural evidence base or by an Outline Arboricultural Method Statement demonstrating how effects on retained trees, hedgerows and woodland would be avoided in practice.
REP1-033	Rosefield Energyfarm Limited	5.22 Draft Statement of Common Ground with Buckinghamshire Council (Rev 1)	Historic Environment: No change to our current position. However in two calls since Deadline 1 the SoCG has been refined. The next SoCG to be tabled soon highlights areas of agreement for historic built environment. It also consolidates points which were separated by the applicant in earlier drafting, relating to our disagreements over methodology and resulting assessment of harm. These are in fact one point of disagreement, rather than the two points highlighted in Table 4, 4-1 and 4-5. Although Bernwood farmhouse was within the draft at Deadline 1, there was more recent discussion on this. It is not a listed building and is apparently not on the Historic Environment Record. It was not on the list of heritage assets that we requested be included in the assessment The applicant's assessment identifies it as a Locally Listed building, as such, I have more recently requested (13/04/2026) that it is considered, as there would be a large impact to the setting of a building of low historic environment significance
REP1-036	Rosefield Energyfarm Limited	6.2.2 Environmental Statement Volume 2 Chapter 7 - Biodiversity (Clean) (Rev 2)	Arboriculture: Any clarification on arboricultural matters within the biodiversity chapter is noted, but the Council's position is not materially changed. The updated text does not remove the need for clearer arboricultural evidence and methodology, including confirmation of full ground verification, consistent treatment of woodland as woodland where appropriate, and a more robust, feature-specific approach to buffers, retained veteran trees and future veteran

Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			potential
REP1-040	Rosefield Energyfarm Limited	6.2.2 Environmental Statement Volume 2 Chapter 13 - Noise and Vibration (Clean) (Rev 2)	The Council welcomes the strengthening of section 2.8 of the Outline Operational Environmental Management Plan, including the commitment that detailed design solutions will not proceed unless post-mitigation operational noise achieves the adopted criteria of 40 dB LAr (day) and 35 dB LAr (night) at high-sensitivity receptors, together with the inclusion of verification monitoring and a defined complaints procedure. These measures respond to aspects of the Council's Local Impact Report. However, the Council's LIR identified that compliance with these numeric thresholds does not, in itself, preclude the potential for significant residual effects in EIA terms, particularly in a very low background noise environment and in respect of public rights of way and tranquillity. The Council therefore considers that, while section 2.8 provides an improved framework, further assurance is required through the detailed OEMP secured by DCO requirement to address residual effects, noise character, mitigation, and the scope and frequency of operational monitoring. The Council will provide further comment once the detailed OEMP and supporting evidence are available for review.
REP1-044	Rosefield Energyfarm Limited	6.2.2 Environmental Statement Volume 2 Chapter 17 - Cumulative Effects (Clean) (Rev 2)	Arboriculture: The Council's concern remains that cumulative arboricultural effects, particularly in relation to ancient woodland and woodland edge pressure in the wider Calvert area, are not yet sufficiently resolved. This includes the continuing concern that land adjacent to Decoypond Wood appears to be presented as part of the scheme's buffer or mitigation approach while also appearing to overlap with land associated with HS2 mitigation planting, raising an unresolved issue of potential double use of land for separate mitigation functions.
REP1-047	Rosefield Energyfarm	6.3.2 Environmental Statement Volume 3 - Land and	Land and Groundwater: The only amendment is that the GWDTE of Finemere Wood SSSI has been added, which is welcomed but does not change our current position.

Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
	Limited	Groundwater Figures 11.1 – 11.3 (Rev 2)	
REP1-053	Rosefield Energyfarm Limited	6.4 Environmental Statement Volume 4 -Appendix 10.6: LVIA Visualisations Summer Photosheets Part 4 (Rev 1)	Historic Environment: No change to current position. These viewpoints in summer show the prominence of Botolph Claydon Conservation Area, East Claydon and St Mary's church (grade II*) over the proposed scheme. These are summer views. The church is visible in the winter. Views not chosen on edge of hills (e.g. NW of Hogshaw Hill Farm show a closer view on the same bridleway as VP 30).
REP1-056	Rosefield Energyfarm Limited	6.4.2 Environmental Statement Volume 4 -Appendix 5.5: Health and Wellbeing Summary Statement (Clean) (Rev 2)	Human Health: documentation has been fully reviewed. Buckinghamshire Council position has been updated and set out within the response to ExA question Q1.13.1 ; and as an addendum to the Local Impact Report. Buckinghamshire Council is not satisfied that the assessment of human health yet adequately addresses all concerns raised. Further, the significance of human health effects has not been added to the ES Non Technical Summary [APP-077], which should be updated to align. Air Quality: Reviewed this statement and provided comments on connection to air quality in the Council's response to the ExA's questions.
REP1-064	Rosefield Energyfarm Limited	6.4.2 Environmental Statement Volume 4 -Appendix 9.2: Geophysical Survey Report (Clean) (Rev 2)	The archaeological geophysical survey has been approved and supplied to the HER, however they are still waiting for paper copies to be supplied.
REP1-078	Rosefield Energyfarm Limited	7.2.2 Outline Construction Environmental Management Plan (Clean) (Rev 2)	Historic Built Environment: No change to our current position. We assume new provisions for accidental damage to Archaeological Remains and Heritage Assets in table 3.4 includes curtilage boundary structures of listed buildings, elements (e.g. trees) that contribute to the character, appearance and significance of conservation areas. Arboriculture: In the absence of an Outline AMS, there is insufficient confidence that the arboricultural components of the CEMP, LEMP and related post-consent

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			<p>documents can be properly developed and secured in a manner that is proportionate, targeted and fit for purpose. As submitted, the CEMP fails to provide an adequate framework for managing arboricultural constraints during the construction phase.</p> <p>The Council also remains concerned that the submitted material does not clearly establish when the Proposed Site Fence (as per the AIA) would be erected. This is notwithstanding that the fence appears, in places, to be relied upon as a functional tree protection measure. Without clarity on timing, specification and installation, no confidence can be attached to its effectiveness as a protective barrier. In respect to Group G98, which is described as “suspected to be black poplar, will remain unaffected by works and will be fenced to beyond its projected RPA,” the Council considers this position to be inadequately evidenced. The trees have not been clearly or conclusively identified, and given the potential presence of black poplar, a species of high conservation and material planning importance, this lack of certainty is significant. Furthermore, the proximity of the proposed works to the group is excessive and, in the absence of a detailed Outline Arboricultural Method Statement, there is no demonstrable evidence to show how works within or adjacent to the Root Protection Area would be avoided or managed. On this basis, the assertion that the trees would remain unaffected cannot be accepted.</p> <p>The Council’s core arboricultural concerns are not materially changed. In particular, the application still does not include an Outline AMS. Instead, the Applicant continues to rely on the future preparation of a detailed site-specific AMS and Tree Protection Plan through the CEMP process. In the Council’s view, that does not provide sufficient certainty at this stage as to how works would be undertaken in proximity to retained trees, hedgerows, woodland edges and veteran trees, nor does it clearly demonstrate that the proposed mitigation strategy is capable of being delivered in practice. The Council’s position remains that a number of matters fundamental to the assessment of arboricultural effects - including the approach to access routes, cabling, drainage</p>

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			<p>features, highway works, temporary construction compounds, buffer areas and decommissioning activities - cannot be wholly deferred to later-stage discharge without undermining confidence in the assessment. In the absence of an Outline AMS, there is also insufficient confidence that the arboricultural components of the CEMP, LEMP and related post-consent documents can be properly developed and secured in a manner that is proportionate, targeted and fit for purpose.</p> <p>The Council also remains concerned regarding the robustness of the arboricultural baseline, including the extent to which all relevant tree data has been fully ground-verified, and regarding the classification of woodland features, where some woodland areas appear to have been treated as groups rather than woodland parcels. The Applicant has provided further explanation on the use of drone survey data and woodland identification, but this does not fully resolve the Council's concern that the current assessment may understate woodland edge sensitivity, shared rooting environments and indirect effects. The Council's concerns also remain in relation to the adequacy and consistency of the proposed buffer strategy, particularly for ancient woodland, woodland edges, hedgerows with mature standards, and veteran and future veteran trees, as well as the treatment of access, highway and drainage works in proximity to trees and woodland buffers. In the Council's view, the proposed mitigation cannot yet be relied upon to demonstrate that retained arboricultural features will be effectively safeguarded over the lifetime of the development. The Council further remains concerned regarding Decoypond Wood and the interaction with HS2 mitigation land. The Council's LIR identifies that HS2 compensation and mitigation planting associated with impacts on ancient woodland in the Calvert area includes land to the north and east of Decoypond Wood, and that the Rosefield Order Limits overlap with the HS2 Act Limits in this area. The Council remains concerned that Rosefield's mitigation buffers are proposed in land that is to be, or has been, planted as woodland by HS2. In the Council's view, a buffer intended to safeguard the integrity and edge conditions of ancient woodland should not also be required to perform mitigation functions arising from a separate large-scale infrastructure</p>

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			<p>scheme. This remains an unresolved cumulative issue of direct relevance to the adequacy and resilience of the proposed buffer strategy. The Council also maintains its concern regarding the fencing strategy. The AIA distinguishes between the Tree Protection Fence and the Proposed Site Fence.</p> <p>The AIA clearly states that the tree protection fencing must be installed before any site mobilisation works or construction begins, which is noted. However, the Council has not identified equivalent clarity as to when the Proposed Site Fence (as per AIA) would be erected, notwithstanding that the Applicant also indicates that, in many cases, the boundary security fencing will act as a tree protection barrier. In the absence of that clarity, uncertainty remains as to how retained trees, hedgerows, woodland edges and buffer areas would be protected in the period before the Proposed Site Fence is installed. Given that buffers and stand-off areas are a primary mechanism by which impacts are intended to be avoided, the timing and protective function of this fencing is a material matter. Finally, the Council's position remains that the breadth of the powers sought under Articles 40 and 41 of the draft DCO must be considered in the context of these continuing uncertainties. While such provisions are not uncommon in principle, their exercise depends on the underlying arboricultural assessment and protection strategy being sufficiently robust to ensure that important trees and hedgerows are properly identified and safeguarded. For the reasons set out above, the Council remains of the view that further clarification and amendment are required before it can be satisfied that arboricultural impacts have been fully identified, appropriately avoided and robustly mitigated.</p> <p>Air Quality and land and groundwater:</p> <p>Section 2.22.4 states that the applicant will liaise with TCS Biosciences and Preston Farms during the preparation of the detailed CEMP and subsequently during the construction phase. The applicant also lists measures which will be included within the CEMP which includes:</p>

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			<ul style="list-style-type: none"> • providing advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land • appropriate biosecurity measures reflective of the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and • Provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above. <p>The Council recognises the benefits of these changes, however at the same time, we recognise the nature of the evidence from TCS. The Council will provide comment after Deadline 2 so that we can see what TCS say.</p> <ol style="list-style-type: none"> 1. Table 3.1: Air Quality – under mitigation/enhancement measure for operating vehicle/machinery and sustainable travel (pg.30) the applicant has added that continuous dust monitoring results will be shared with Buckinghamshire Council on a three-monthly basis. This addition is welcomed. 2. Table 3.6: Land and groundwater - under potential impact for contamination of soil/groundwater (pg. 53) the applicant has added that ground gas and groundwater monitoring will be undertaken if required, and any associated mitigation would form part of the detailed Construction Environmental Management Plan(s). Again, this addition is welcomed and partly addresses point 4.10.19 or our LIR response. 3. Table 3.6: Land and groundwater – under mitigation/enhancement measure for site set up, ground work and construction (pg.63) an additional mitigation measure has been added which states water wheel washing or 'dry brush' wheel washing will be undertaken, if required. If water wheel washing is

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			<p>undertaken, it will be undertaken within a contained designated impermeable or lined area and should not be allowed to discharge into a watercourse or infiltrate to groundwater. The site of the wheel washing facilities should be a minimum of 10m from the top of bank of watercourses / ditches. The addition of this mitigation measure is welcomed and will further ensure that any dust created during the construction phase is mitigated and limits the amount of soil being tracked out onto the highway/ neighbouring land.</p> <p>Table 3.6: Land and groundwater – under mitigation/enhancement measure for spillages and leaks (pg. 67) a new section has been added with regards to the discovery of unexpected contamination. The procedure outlined is accepted and the expansion of this point is welcomed.</p>
REP1-080	Rosefield Energyfarm Limited	7.3.2 Outline Operational Environmental Management Plan (Clean) (Rev 2)	<p>Air Quality and Contaminated Land:</p> <ol style="list-style-type: none"> Section 2.15.2 states that the Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd (together, the Prestons’) during the preparation of the detailed Operational Environmental Management Plan and subsequently during the operational phase. Measures to be included in the detailed Operational Environmental Management Plan will include: <ul style="list-style-type: none"> providing advance notification of the location and timing of any maintenance activities in proximity to the Prestons’ grazing land; · appropriate biosecurity measures reflective of the Prestons’ own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and · provision of toolbox talks to relevant site staff about the sensitive

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			<p style="text-align: center;">nature of the Prestons' specialist operations, and the processes around the measures above.</p> <p>The Council recognises the benefits of these changes, however at the same time, recognise the nature of the evidence from TCS. The Council will provide comment after Deadline 2 so that we can see what TCS say.</p> <p>2. Table 3.5: Land and groundwater – under mitigation/enhancement measure for water pollution (pg. 28) a new section has been added which states the transformers will be bunded and placed on an impermeable base and will have separate oil interceptors and an emergency shut off system to prevent fire risk and the contamination of firewater and surface water runoff. All bunds will have 110% capacity of oil in the transformers as per the relevant requirements. This partly addresses some of the concerns raised in point 4.10.21 of the Council LIR response.</p> <p>3. Table 3.5: Land and groundwater – under mitigation/enhancement measure for site set up, groundwork and construction (pg.34) an additional mitigation measure has been added which states water wheel washing or 'dry brush' wheel washing will be undertaken, if required. If water wheel washing is undertaken, it will be undertaken within a contained designated impermeable or lined area and should not be allowed to discharge into a watercourse or infiltrate to groundwater. The site of the wheel washing facilities should be a minimum of 10m from the top of bank of watercourses / ditches. The addition of this mitigation measure is welcomed and will further ensure that any dust created during the construction phase is mitigated and limits the amount of soil being tracked out onto the highway/ neighbouring land.</p> <p>4. Table 3.5: Land and groundwater – under mitigation/enhancement measure for spillages and leaks (pg. 39) a new section has been added with regards to the discovery of unexpected contamination. The procedure outlined is accepted and the expansion of this point is welcomed.</p>

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REP1-082	Rosefield Energyfarm Limited	7.4.2 Outline Decommissioning Environmental Management Plan (Clean) (Rev 2)	<p>Air Quality and Contaminated Land:</p> <ol style="list-style-type: none"> Section 2.15.2 states The Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd (together, the Prestons') during the preparation of the detailed Decommissioning Environmental Management Plan(s) and subsequently during the decommissioning phase. Measures to be included in the detailed Decommissioning Environmental Management Plan(s) will include: <ul style="list-style-type: none"> providing advance notification of the location and timing of any decommissioning activities in proximity to the Prestons' grazing land; appropriate biosecurity measures reflective of the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above. <p>The Council recognises the benefits of these changes, however at the same time, we recognise the nature of the evidence from TCS. The Council will provide comment after Deadline 2 so that we can see what TCS say.</p> <ol style="list-style-type: none"> Table 3.6: Land and groundwater – under mitigation/enhancement measure for water pollution (pg. 36) a new section has been added which states the transformers will be bunded and placed on an impermeable base and will have separate oil interceptors and an emergency shut off system to prevent fire risk and the contamination of firewater and surface water runoff. All bunds will have 110% capacity of oil in the transformers as per the relevant

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			<p>requirements. This partly addresses some of the concerns raised in point 4.10.21 of the Council LIR response.</p> <p>3. Table 3.6: Land and groundwater – under mitigation/enhancement measure for site set up, ground work and construction (pg.36) an additional mitigation measure has been added which states water wheel washing or ‘dry brush’ wheel washing will be undertaken, if required. If water wheel washing is undertaken, it will be undertaken within a contained designated impermeable or lined area and should not be allowed to discharge into a watercourse or infiltrate to groundwater. The site of the wheel washing facilities should be a minimum of 10m from the top of bank of watercourses / ditches. The addition of this mitigation measure is welcomed and will further ensure that any dust created during the construction phase is mitigated and limits the amount of soil being tracked out onto the highway/ neighbouring land.</p> <p>Table 3.6: Land and groundwater – under mitigation/enhancement measure for spillages and leaks (pg. 45) a new section has been added with regards to the discovery of unexpected contamination. The procedure outlined is accepted and the expansion of this point is welcomed.</p>
REP1-084	Rosefield Energyfarm Limited	7.5.2 Outline Construction Traffic Management Plan (CTMP) (Clean) (Rev 2)	Arboriculture: Any updates should be reviewed against the AIA to confirm that all highway, verge, passing place, widening and access works with potential to affect trees are transparently reflected in the arboricultural assessment. On the material reviewed to date, the Council’s position is not materially changed and uncertainty remains as to whether all tree, hedgerow and woodland-edge effects associated with traffic management and highway works have been fully identified and assessed from the outset.
REP1-086	Rosefield Energyfarm Limited	7.6.2 Outline Landscape and Ecological Management Plan (Clean) (Rev 2)	Arboriculture comments: The LEMP remains important to long-term management, but it does not remove the need for an Outline AMS or resolve current uncertainty regarding buffer methodology, feature-specific protection, fencing implementation and future tree management pressures over the operational life of the scheme. In the

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			<p>absence of an Outline AMS, there is insufficient confidence that the arboricultural components of the LEMP can be properly developed and secured in a manner that is proportionate, targeted and fit for purpose. The Council's position is therefore not materially changed.</p> <p>It is noted that plans contained within Appendix 5: Green and Blue Infrastructure Parameters – Buffer Widths have now been included within the LEMP. While this information is welcomed, these buffers should form the basis of, and be carried through into, an Outline AMS. The AMS should clearly define how the buffers would function in practice, including the extent and nature of construction exclusions, protection measures, access controls, ground protection, maintenance regimes and how construction and operational activities would be managed within and adjacent to these areas. In the absence of this clarity, the buffer information remains largely illustrative rather than actionable.</p> <p>The additional fencing text is noted, including the statement that Tree Protection Fencing (TPF) will be erected before permitted preliminary works begin and that, where appropriate, the security fence shall act as an effective protection barrier. However, the Council's position is not materially changed. The wording remains conditional and still defers the detailed alignment and implementation of the protective fencing strategy to the AMS, notwithstanding that no Outline AMS has been submitted. The phased erection/dismantling wording also leaves uncertainty as to when and where the perimeter/security fence would operate as protective fencing and how retained trees, hedgerows, woodland edges and buffer areas would be safeguarded throughout construction.</p> <p>Furthermore, notwithstanding the inclusion of these updated plans, the documentation continues to show the HS2 double mitigation strip along Decoypond Wood. This raises continued concern regarding potential encroachment, future management pressures and the cumulative impact on retained woodland, which has not been adequately addressed through a coherent arboricultural strategy.</p>

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			<p>Landscape and Visual: No change to current position. The LEMP is an integral component of the deliverables and is intrinsically linked to the proposed environmental design and its successful delivery and subsequent successful establishment.</p> <p>Ecology: The Outline Landscape and Ecological Monitoring Plan (LEMP) [REP1-087] has set out the mitigation measures or strategies to be used based on the results of the ecological surveys and impact assessments for ecological features. The outline mitigation measures have addressed our concerns in relation to Great Crested Newts, Badger, Invertebrates and Reptiles and breeding and wintering birds.</p> <p>It has not addressed our concerns about the specifications of buffers proposed as way of protecting designated sites and providing mitigation corridors for bats (this is discussed in detail in what we sent previously).</p>
REP1-088	Rosefield Energyfarm Limited	7.7.2 Outline Soil Management Plan (Clean) (Rev 2)	<p>Soils and Agriculture: This document was updated to include this statement “(an experienced person who is trained by a soil specialist) at strategic locations where questions were raised over who would make key soil management decisions”. This is not a secure answer to the Council’s concerns due to its generic nature.</p> <p>Section 5.3.8 is updated to include a clearer statement on how existing land drainage will be managed when disrupted. Section 6.3.7 updated to cover how land drainage will be repaired after trenching. Overall these are minor updates and are not an overall change of position which resolves the Council’s concerns.</p>
REP1-090	Rosefield Energyfarm Limited	7.8.2 Outline Rights of Way & Access Strategy (RoWAS) (Clean) (Rev 2)	<p>Rights of Way: The text amendments which appear in blue are accepted, but, while it’s accepted there is a benefit connecting to SCL/8/1 with the new arrangement, the Council disagrees the revised footpath diversion for the deleted and created network north-west of Pond Farm in Parcel 1 is the best layout possible.</p>

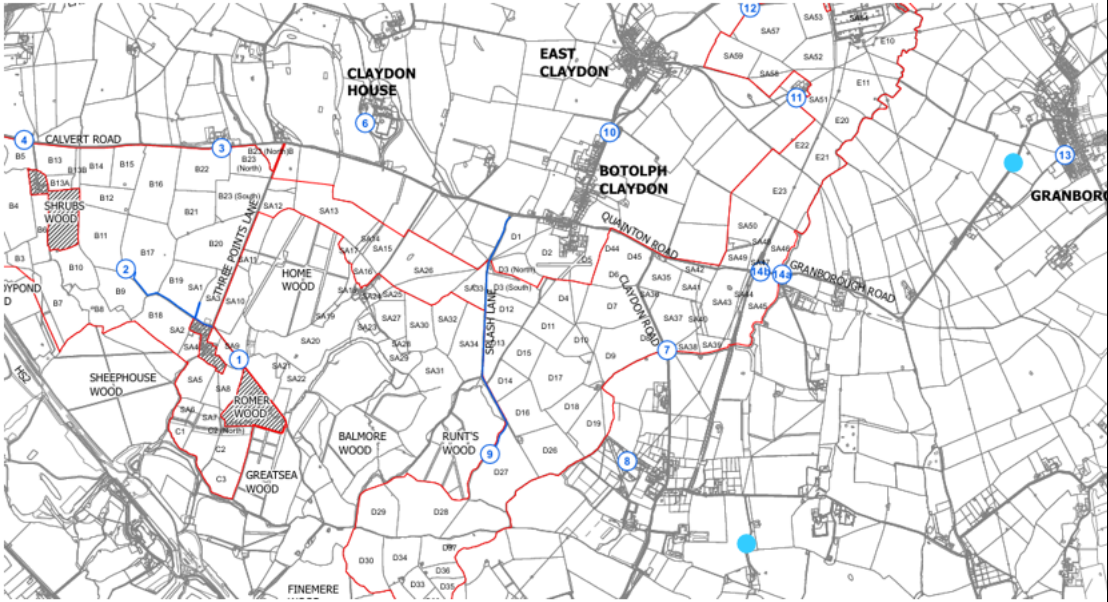
Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			<p>The proposed layout is below shown in document 2.4.3 and shown below.</p> <p>Two right-angle bends are created at point SW40 (left and right) which are unnecessary and inconvenient compared to the desire lines suggested in the Council's comments of Nov 2025. If the field is open, walkers will take the direct route anyway. The recommended plan is copied below, where green is created and black is deleted. The Council recommends a revised plan that reflects this proposal. The Council queries why can this not be provided when there are no solar panels in Field B5.</p> <p>It is also uncertain in the plan provided (STREETS, RIGHTS OF WAY AND ACCESS PLANS SHEET 1 OF 8 - EN010158/APP/2.4.3 March 2026) the distinction between pink lines and turquoise lines and which will appear on the definitive map, e.g. there is a pink line SW03 to SW04 passing along the vehicular access to Pond Farm. It is unclear what this represents. The key says, 'Street Works', but it is unclear what this means where this is drawn 1mm beside an existing or a new footpath.</p>
REP1-094	Rosefield Energyfarm Limited	7.10.2 Draft Archaeological Management Strategy (Clean) (Rev 2)	<p>The Updated dAMS now addresses our concerns and those of Historic England</p> <p>A Teams meeting was held on the 5th February 2026 with the archaeological consultants Headland Archaeology, Historic England and me where archaeological concerns were raised relating to this development. Buckinghamshire Council had supplied the applicant with the concerns below:</p> <p>The Council consider there are a number of aspects of the Draft Archaeology Management Strategy (DAMS) which require improvement [APP-146]. The Applicant is invited to engage with the Council on these issues. These include:</p> <p>a. Clarifying that all archaeological field work will be completed prior to construction work in the relevant area.</p> <p>Covered by Updated DAMS 1.1.4 & Figure 1 DAMS 3.1.2</p>

Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			<p>b. While further pre-construction evaluation in the form of non-intrusive methods to inform targeted trial trenching is welcome, the Council remains concerned about coverage (being the percentage of land trenched). The Council consider that typically this would need to be 4% of areas of infrastructure or where geophysical survey indicated potential archaeological sites, and 2% otherwise. The Council request these figures are included in the DAMS and that such matters be to be agreed with the Council.</p> <p>Covered by DAMS 4.3.1 & 4.3.3</p> <p>Archaeology and Solar Farms Good Practice Guide. Advice for Developers, Archaeological Advisors, Consultants and Contractors Prepared by Solar Energy UK, Historic England, FAME, CifA, ALGAO UK</p> <p>c. The DAMS para 4.3.10 outlines what will be included in the report for the trial trenching. There should be a section on reporting and publication of the results, which includes that the Council's Historic Environment Record will be supplied with copies of all of the reports which have been approved by Buckinghamshire Council and Historic England in hard and digital format.</p> <p>Covered by DAMS 4.2.7, 5.4.25,</p> <p>d. Where archaeology can be preserved in situ, which is included in the DAMS para 5.1.1 and 5.1.2, the methodologies for this should be demonstrated to be appropriate and agreed with Buckinghamshire Council and Historic England.</p> <p>Covered by DAMS 5.1.1, 5.1.2, 5.5 – 5.5.4</p> <p>e. The DAMS should include a section on public engagement, to include things such as podcasts, updates to the local communities with presentations and field visits and participation in excavations where safe and professional to do so.</p>

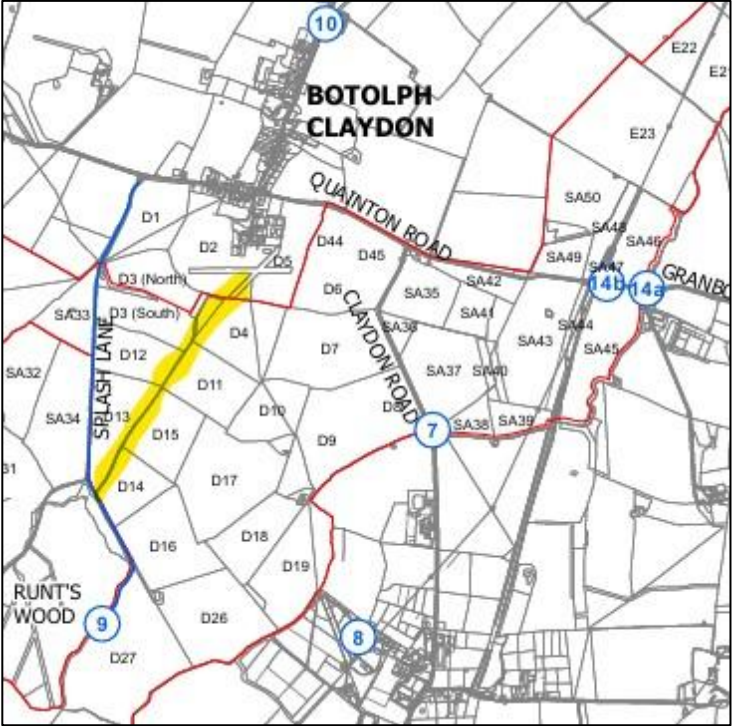
Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			<p>Covered by DAMS 4.2.3, 4.2.4, 4.3.2, 4.3.4</p> <p>f. Furthermore, the DAMS should include a section on decommissioning to include that the methodologies for this will be agreed with Buckinghamshire Council and Historic England. The presence, significance and vulnerability of heritage assets should be made clear in the OEMP and DEMP.</p> <p>Covered by DAMS 5.5 – 5.5.4</p> <p>At the meeting these issues were discussed, and the consultant found our recommendations for a), c), d), e) and f) to be acceptable and would update the DAMP and other documents to address these points. Issue b) was discussed and they queried the inclusion of actual percentages for the trial trenching. A good practice guide for archaeology and solar farms has been produced by the main stakeholders including the solar industry. Historic England and I agreed that wording which is consistent with this document should be ok. The updated DAMS covers these issues and has been agreed with Historic England and Buckinghamshire Council Archaeological Service.</p>
REP1-096	Rosefield Energyfarm Limited	7.11.2 Outline Drainage Strategy (Clean) (Rev 2)	<p>SUDS: Paragraph 2.4.4 has been updated to include an assurance that additional infiltration rate testing will be carried out ahead of detailed design in/around the locations of each proposed pond. Paragraph 11.2.1 has been updated to include reference to further infiltration rate testing as per the above commitment in 2.4.4. The proposed amendments in relation to further infiltration rate testing are satisfactory.</p> <p>Arboriculture: Drainage proposals remain highly relevant where attenuation or drainage features are located close to, or within, woodland or arboricultural buffers. The updated submission appears to indicate that surface water drainage would utilise existing ponds across the site. However, this would still require excavation to create connections between features, as well as the construction of new drainage</p>

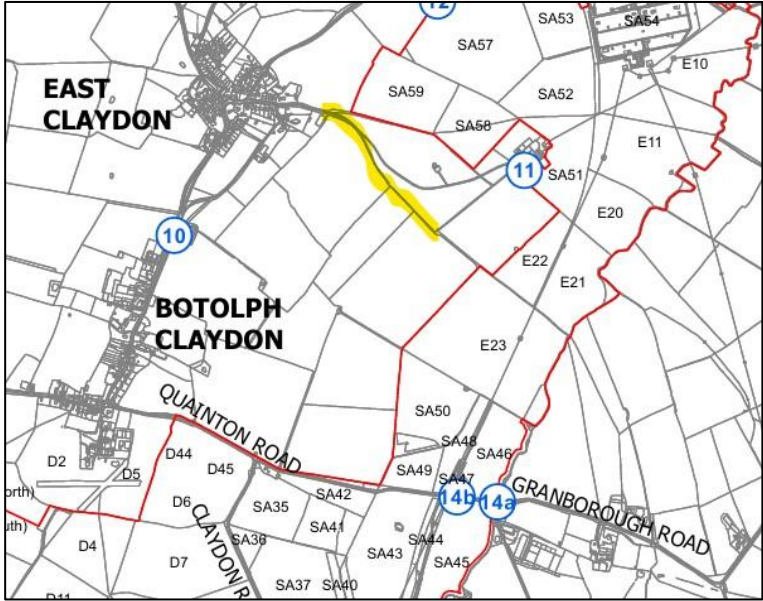
Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			<p>infrastructure. The key concern remains that buffer strips should operate as development-free exclusion zones and not accommodate excavation, attenuation or other engineered works, particularly where woodland edge integrity is already subject to cumulative pressure. In the absence of a clear buffer strategy, supported by an Outline AMS there is no certainty as to how buffer areas would be protected in practice or how conflicts between drainage infrastructure and arboricultural constraints would be avoided, and the Council's position remains unchanged.</p>
REP1-100	Rosefield Energyfarm Limited	7.14.2 Outline Employment, Skills and Supply Chain Plan (Clean) (Rev 2)	<p>Employment and Skills: The Council welcome the additional text for clarification.</p>
REP1-105	Rosefield Energyfarm Limited	8.5 Bat Technical Study	<p>The applicant has submitted a Bat Technical Study [REP1-105] to provide additional information requested by Natural England. The technical study has attempted to consider whether construction noise or operational noise may impact the bats and also whether the placement of panels within pasture fields grazed by cattle would reduce the foraging resource for bats.</p> <p>The Technical Study has summarized the research relating to the types of invertebrates that <i>Myotis</i> species feed on and how livestock and the type of livestock management has an impact on the invertebrates present for the bats to forage. There is a general consensus within the research that there is a positive correlation between livestock and increased invertebrates available for bats to forage. While the research to date has considered cattle grazing, the relationship with sheep has not been investigated. The technical study has attempted to compare the insect communities associated with sheep and cattle, but has only considered this at a high level; that sheep dung also attracts flies and moths, rather than considering the species assemblages associated with cattle vs sheep.</p> <p>The additional information has not addressed the council's concerns that solar farms may be displacing bats for reasons which are not yet understood. The placement of panels in these fields therefore could make them unsuitable for bats to forage, even if livestock are present.</p>

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			<p>The technical study has also attempted to compare the numbers of bats using boundary features with the numbers using the open fields, concluding that there are more bats using boundary features than the open fields, asserting that the open fields are therefore not important for Bechstein's bat at this site. There is a significant issue in the methodology in that only one detector was placed within the open fields. Detectors can only detect bats that come within close range; often within approximately 5m), whilst this method of detection works well along a boundary feature; as bats will mostly fly within close proximity to the detector when following a boundary, it doesn't work for a large open area where the bats could be using space not in close proximity to the detector. Whilst this has been mentioned as a limitation within the study, it has been overlooked when conclusions have been drawn. The council therefore does not consider that this study is suitable to inform decision making and instead refers to previous evidence [1], [2] which indicates Bechstein's bats do forage in open fields and in particular pasture grazed by cattle.</p>
REP1-110	Rosefield Energyfarm Limited	8.10 Applicants Draft Itinerary for the Accompanied Site Inspection (ASI)	<p><u>Historic Environment:</u></p> <p>There would be long views from the south east and east, especially from higher ground, towards Botolph Claydon Conservation Area and East Claydon (the village being of similar significance to Botolph Claydon) and its grade II* listed St Mary's Church. These are illustrated by a view from the higher ground on the bridleway 200m north of Hogshaw Hill Farm and from Hogshaw Road as it approaches Granborough from the south west. In the winter the hedges on Hogshaw Road are visually porous and the heritage assets to the west would be visible over the Solar farm, with harm to its setting.</p>

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			 <p data-bbox="1055 914 2029 943">● Proposed additional views The two to the west of <u>Granborough</u> could be one.</p> <p data-bbox="1039 995 2141 1222">The view near Hogshaw Hill Farm (on the south of the map) is on a frequented bridleway (several people were seen there on a cold weekday afternoon). It has very good views of Botolph Claydon CA and East Claydon (possible future CA). The LVIA viewpoint on that bridleway is from further to the south east, set back from the hill's slope and plays less of a role in the setting of the Botolph Claydon Conservation Area and East Claydon.</p> <p data-bbox="1039 1273 2141 1342">The view on Hogshaw Road may be as good as number 13, but the Hogshaw Road views are kinetic on slopes along the road.</p> <p data-bbox="1039 1350 2141 1418">The Council has flagged these views in a meeting with the Applicant 10/04/26. They said they would take that away and consider them.</p> <p data-bbox="1039 1426 2141 1458">In relation to the Applicant's proposed 14a and 14b, 14a is located where there is a</p>

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			<p>modern shed that obscures views of the conservation area. It may relate to a footpath, but in terms of the conservation area's setting there are locations on the road nearer the junction with Claydon Road where arrays in D45 may be visible in the setting of Botolph Claydon Conservation Area despite the increased screening on the north side of that field.</p> <p><u>Landscape and Visual comments:</u></p> <p>Broadly in agreement with the locations that have been selected, additional locations have been identified below:</p> <p>Incorporating part of the Bernwood Jubilee Way (to the south of Botolph Claydon) to the point where it meets the PROW (footpath) north of Runts Wood. This would be an extension of inspection point number 9: Footpath east of Runts Wood.</p> <p><i>[Continued on next page]</i></p>

Document Ref and Link	Author	Document Title	Buckinghamshire Council Comments
			 <p data-bbox="1025 1013 2161 1093"> <i>Additional section of PROW (Bernwood Jubilee Way) leading from Runts Wood to Botolph Claydon.</i> </p> <p data-bbox="1025 1125 2161 1292"> The view from this section of the PROW network contains views that would have close distance views of proposed solar panels that would also be viewed from an elevated viewpoint that would afford views across the characteristic rolling landscape to the east. This view would also afford elevated views towards the BESS location. </p> <p data-bbox="1025 1324 2161 1436"> Incorporating part of the North Buckinghamshire Way/Midshires Way (to the east of East Claydon) towards Lower Farm. This would be an extension of inspection point number 11: </p>

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			 <p data-bbox="1025 962 2078 1038"> <i>Additional section of PROW (North Buckinghamshire Way/Midshires Way) leading from East Claydon towards Lower Farm.</i> </p> <p data-bbox="1025 1074 2161 1334"> The view from the top section of the access towards Sion Hill Farm also forms part of the North Buckinghamshire Way/Midshires Way PROW network, this portion should be added to the site inspection location number 11. This is an elevated viewpoint that provides extensive views towards the proposed Rosefield substation and main collector compound as well as solar panels. This viewpoint would also demonstrate the character of the rolling landscape. </p>