

Rosefield Solar Farm

Applicant's Response to Buckinghamshire Council's Local Impact Report

EN010158/APP/8.11
Revision 01
Deadline 2
April 2026
Rosefield Energyfarm Limited

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



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1. Introduction

1.1. Purpose of the Report

- 1.1.1. This Report provides the Applicant's responses to the Local Impact Reports (LIR) received at Deadline 1 in respect of the proposed Rosefield Solar Farm (the 'Proposed Development').
- 1.1.2. Due to the breadth of Buckinghamshire Council's LIR [\[REP1-112\]](#), the Applicant has provided a standalone response to the LIR whilst all Written Representations (WRs) received at Deadline 1 have been summarised and responded to in the **Applicant's Response to Written Representations [EN010158/APP/8.12]**.

1.2. Structure

- 1.2.1. This document is structured as follows:
- **Section 2** provides an overview of Buckinghamshire Council's LIR; and
 - **Section 3** provides the Applicant's thematic responses to the points raised in Buckinghamshire Council's LIR, including signposting to other responses and DCO Application documents, where appropriate.

1.3. Approach

- 1.3.1. At Deadline 1, Buckinghamshire Council submitted a LIR [\[REP1-112\]](#) as requested by the Examining Authority (ExA). The Applicant therefore wishes to provide a response to this LIR to provide an up-to-date position on the Applicant's discussions with Buckinghamshire Council and, where appropriate, our responses to the matters raised. This document should be read together with the **Draft SoCG with Buckinghamshire Council [EN010158/APP/5.22.2]**.
- 1.3.2. Due to the length of the submitted LIR, this document has been structured to provide the Applicant's summarisation of the key matters raised by Buckinghamshire Council. Not all paragraphs of the LIR have been responded to below, the Applicant has only responded to sections of the LIR that it considers requires a response.
- 1.3.3. This document does not look to duplicate the Applicant's Response to Buckinghamshire Council's Relevant Representation [\[RR-026\]](#) as this response has been provided for in the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. Where appropriate to avoid repetition, the Applicant has sought to cross-refer back to responses provided in the aforementioned documents.

2. Overview of Buckinghamshire Council's LIR

2.1. Summary

2.1.1. The following topics were raised, in order, by Buckinghamshire Council in section 4 of their LIR:

- Introduction;
- Site Selection;
- Ecology and Arboricultural Matters;
- Landscape and Visual Impact;
- Cultural Heritage and Archaeology;
- Population and Human Health;
- Highways, Transport and Public Rights of Way;
- Noise and Vibration;
- Soil;
- Land and Groundwater;
- Flood Risk and Drainage;
- Air Quality;
- Socio-economics;
- Resources (Materials) and Waste;
- Climate Change; and
- Cumulative Effects.

2.1.2. Sections 2, 3 and 5 of Buckinghamshire Council's LIR consider the Proposed Development, the Legislative Context and provide comments on the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** respectively.

2.1.3. **Section 3** of this document provides the Applicant's response to the abovementioned topics under the headings provided for in the Rule 6 letter dated 27 January 2026 [\[PD-008\]](#) for ease of readability.

3. Applicant's Thematic Responses

Table 3-1: Introduction

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
1.1	Exec. Summary Para. 1	Comment that the LIR sets out Buckinghamshire Council's overarching position which is that the policy threshold for the refusal of the Proposed Development is met.	The Applicant respectfully disagrees with Buckinghamshire Council's position on this. As noted and justified in Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016], the combined benefits of the Proposed Development outweigh any residual effects and the planning balance is firmly in favour of approval. 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 and the Policy Compliance Assessment Tables at Appendix 4 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]. The Applicant wishes to note that the other issues raised by Buckinghamshire Council in the executive summary section of the LIR have been captured through the Applicant's responses to each relevant topic matter in this document.
1.2	1.2.3	Comment confirming that the LIR does not seek to duplicate material covered in the Statement of Common Ground between the Applicant and Buckinghamshire Council.	The Applicant notes and welcomes Buckinghamshire Council's confirmation that the Local Impact Report does not seek to duplicate the material that is covered within the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2].
1.3	1.3.2	Comment noting that the Applicant has requested for the Grid Connection Agreement be reduced from up to 500 Megawatts (MW) via the East Claydon Substation to 335 MW and that, when further information is known, any update ought to be reflected in the Grid Connection Statement.	Noted. If a revised grid connection offer is received prior to the end of examination, the Grid Connection Statement [EN010158/APP/7.1] [APP-137] will be updated and submitted into Examination at the next available deadline.

Table 3-2: Need, Site Selection and Alternatives

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		Approach to the Consideration of Alternatives, Including Location, Scale and Technology	
2.1	4.2.1 & 4.2.14	Comment that the assessment of alternatives is not proportionate to the scale, sensitivity or potential impacts of the Proposed Development.	The Applicant respectfully disagrees with this statement. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. This process explains 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.
2.2	4.2.1 & 4.2.14	Comment that the site selection process was framed principally around the availability of a single willing landowner adjacent to the National Grid East Claydon Substation, rather than a transparent, constraints-led evaluation across the wider 10km search area.	The Applicant respectfully disagrees with this statement. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) explains that the Applicant was aware that minimising the number of landowners engaged can be beneficial for a number of reasons such as simplifying land negotiations, reducing the risk of project failure (due to added complexity of multiple land owners), and reducing reliance on compulsory acquisition in accordance with policy requirements (thereby reducing impacts on affected parties). For these reasons, single, contiguous sites with as few landowners as possible were prioritised. It is important to note that having regard to this benefit in the site selection process was not done at the expense of undertaking a full and exhaustive constraints-led search for suitable land within the 10km Search Area. The consideration of environmental constraints was key to the site selection process and, in accordance with sections 2.3 and 2.10 of NPS EN-3 (2023), the Applicant duly considered the following constraints: • Irradiance and site topography; • Network connection; • Proximity of the site(s) to dwellings; • Agriculture land classification and land type; • Accessibility; • Public rights of ways; • Designated international and national ecological and geological sites; • Nationally Designated Landscapes; • Flooding; • Heritage; and • (To the extent this can be dealt with at the site selection stage) security and lighting.
2.3	4.2.1	Comment that the site selection process has mischaracterised local topography meaning that elements of the Proposed Development are located in harmful locations.	The Applicant respectfully disagrees that the Applicant has mischaracterised local topography. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) notes that the general topography of the area surrounding the National Grid East Claydon Substation is gently undulating, with much of

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			the land sloping north to south, making it generally suitable for solar. The level of undulation in land across the 10km Search Area is relatively consistent. Once a suitable Site had been identified, and as set out in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], the topography of the Site influenced the design of the Proposed Development. 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 and visual considerations, which included reducing visibility within the Area of Attractive Landscape 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/5.8.2] [REP1-018].
2.4	4.2.1	Comment that the site selection process has failed to consider the location of the BESS against other locally consented and proposed schemes meaning that opportunities to avoid harm have been missed.	The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]), sets out the Applicant's site selection process for identifying sites that were suitable for large scale solar development generally. ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] recognises (through paragraphs 4.7.13 – 4.7.15 and 4.7.21 and 4.7.22 and 4.7.39 – 4.7.41) how, at the site level, the design and location of BESS was then influenced by constraints, modelling and consultation feedback. Paragraphs 2.10.17 and 2.10.18 of NPS EN-3 (2023) detail that to maximise “existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity” and, should this be the case at the site selection stage, applicants are to then consider the “cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure”. The Applicant reaffirms that due regard has been had for policy requirements through the site selection process and the Applicant considers that the Proposed Development's design at the site level also complies with these requirements. Furthermore, cumulative effects have been a core consideration throughout both the design evolution of the Proposed Development and the environmental assessment process. The design development and siting of the BESS is detailed within ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] which considers the reasonable alternatives that have been considered and the design evolution of the Proposed Development at the site level. ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] presents a detailed Cumulative Effects Assessment which identifies relevant other existing and/or approved developments and assesses potential combined effects in accordance with established EIA methodology. This includes consideration of spatial overlap, temporal overlap and the potential for interactive effects. Cumulative interactions with nearby projects have directly informed the evolution of the design. For example, based on the operational noise assessment and iterative layout design, the BESS was intentionally located to ensure cumulative operational noise remain within the required limits, when considered alongside other existing and/or approved developments, particularly the East Claydon BESS. Similar design-led considerations were applied across other technical disciplines to ensure potential cumulative effects were minimised, wherever possible. The Applicant therefore considers that opportunities to avoid harm have not been missed and cumulative effects has been fully accounted for through a robust assessment process and proactive, iterative design process.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Furthermore, Appendix 1: Letter to Buckinghamshire Council on BESS Locations , to this document contains the letter the Applicant sent to Buckinghamshire Council which provided the Applicant's commentary on Buckinghamshire Council's Relevant Representation with regard to the location of the battery energy storage system.
2.5	4.2.14	Comment that the Site Selection Report appended to the Planning Statement is limited in analysis and that it does not indicate a proper approach to the avoidance of effects as part of applying the mitigation hierarchy.	The Applicant respectfully disagrees. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) 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 (2023), NPS EN-3 (2023), NPS EN-5 (2023), the NPPF, the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG and the EIA Regulations 2017. Furthermore, Paragraphs 4.2.28 and 4.2.29 of the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) set out the key environmental and spatial considerations which factored as key considerations in the site selection process to minimise potential impacts of the Proposed Development. Further detail on the reasonable alternatives that were considered for the Proposed Development are also provided in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]. At the site level, 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.
2.6	4.2.15 & 4.2.16	Comment that there is no compelling evidence to suggest that other landholdings within the search area were identified, approached, assessed, or discounted on the basis of environmental, landscape or planning considerations. Further comment noting that the evidence for site selection is narrow and unduly predetermined by land control.	The Applicant would like to direct the Council to NPS EN-1(2023) paragraph 4.3.9 which states that '<i>this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective</i>'. Regardless of this, the Applicant has set out its approach to site selection in the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]), concluding that a logical approach was taken which sought to find land that was available and suitable for large scale solar deployment, from an irradiance and topography perspective and having regard to environmental and planning constraints within a suitable 10km radius. The Applicant took these constraints into consideration and used this to identify land that met the criteria within the Search Area. The Applicant then sought to approach owners of this land to understand their willingness for their land to be involved in the Proposed Development. As a result of this process the Applicant identified a single willing landowner located directly adjacent to the National Grid East Claydon Substation. In a similar sense to paragraph 4.3.9, NPS EN-1 (2023) paragraph 4.3.24 recognises that a proposed project does not have to demonstrate that it is the best option, but rather that it is acceptable under the provisions of the relevant policy. As set out in the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) the Applicant considers that the site selection for the Proposed Development followed a logical approach and that the chosen site was, and remains, acceptable under the provisions of the relevant policy.
2.7	4.2.15	Comment that only limited weight ought to be placed on the Applicant's alternatives assessment and that Buckinghamshire Council consider this points to the failure of the Applicant to avoid and mitigate certain effects.	The Applicant does not consider that the assessment of alternatives ought to carry weight in the overall planning balance. This is because, in accordance with Paragraph 4.3.24 of NPS EN-1 (2023), the Secretary of State " <i>should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals</i> ".

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Furthermore, Paragraph 4.3.9 of NPS EN-1 confirms that a proposed project does not have to demonstrate that it is the best option but rather that it is acceptable under the provisions of the relevant policy. As in recent Examining Authority Recommendation Reports to the Secretary of State, such as the Fenwick Solar Farm Recommendation Report, the planning balance should be framed against the need of the Proposed Development, the effects (beneficial and adverse) concluded within the relevant environmental statement, any other material considerations and the relevant legislative test(s), such as compulsory acquisition.
2.8	4.2.17 & 4.2.18	Comment that the Applicant's description of the Site being 'relatively flat with a gently undulating topography' is not supported by local evidence. Instead, Buckinghamshire Council considers there to be gentle to moderate landscape undulation with clear variations across parcels. Further comment that Buckinghamshire Council considers this difference in description materially affects assessments of visual exposure. An example is provided in Paragraph 4.2.18 of the LIR.	The Applicant would like to clarify that the text quoted by the Council at Paragraph 5.2.1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] directly refers to the local landscape surrounding the National Grid East Claydon Substation, rather than the wider Site as misinterpreted by the Council. ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045] notes that Parcel 1 and 1a are considered gently undulating with the highest point being Knowl Hill around 116m above ordnance datum and notes the difference in topography across the parcels of land. This is also supported by the Topography Plan which is provided in ES Volume 3, Figure 2.3: Topography Plan [EN010158/APP/6.3] [AS-020] which has informed the assessments within the Environmental Statement, including the landscape and visual assessment detailed in Assessment detailed in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].
2.9	4.2.19	Comment that BESS in this location would appear incongruous when compared to solar arrays which sit low in the landscape and can be partially absorbed by landform. Comment that BESS introduces substantial massing and associated infrastructure.	Whilst the Applicant recognises that there would be a height difference between the solar arrays and the BESS, with the solar PV modules no greater than 3.5m above ground level (AGL) (post-earthworks) in Parcel 2 and the BESS compound no greater than 6m AGL (post-earthworks), the proposed location of the BESS reduces the BESS's prominence on the skyline when compared to if the BESS were to be located in the flatter Parcel 3. These heights are secured in the Design Commitments [EN010158/APP/5.9.4]. Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape, with higher landform behind it, when viewed from the east and south. Other factors that have led to the location of the BESS within Parcel 2, which include, but are not limited to, consideration of space requirements for the BESS, impacts on tenants and businesses, noise, flood risk, heritage and residential visual amenity, are detailed further in Section 5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Appendix 2 to this document.
2.10	4.2.19	The BESS would include tall close-boarded acoustic fencing which would be wholly out of keeping with the rural typology in the area. Further comment that the fencing would appear stark in mid- to long-distance views.	As secured in the Design Commitments [EN010158/APP/5.9.4], the acoustic fencing would be no greater than 3.5m AGL (post-earthworks). This is the same maximum height as the solar PV modules. The design of the acoustic barriers, which may not be close-boarded acoustic fencing, will be finalised during the detailed design stage once the noise levels of the final equipment choices are known. As set out on pages 79 and 80 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], there are various material options that can be adopted for the acoustic barriers. The specification of any acoustic mitigation scheme would be provided prior to operation and is secured by a requirement of the Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.3], (Section 2.8). The visual impact of the acoustic barrier is considered on pages 176-178 of the ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]. Its impacts will primarily be localised due to its scale being similar to the solar PV modules and smaller than the BESS.
2.11	4.2.20	Comment that BESS would introduce operational noise, including transformer hum, and intermittent	During the operation (including maintenance) phase, noise from equipment installations associated with the Proposed Development would be heavily mitigated, including use of low-noise units and acoustic barriers as set out

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		night-time activity. Further comment that BESS would erode the tranquillity along the Bernwood Jubilee Way, thus diminishing recreational amenity.	and secured in the Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.3] and Design Commitments [EN010158/APP/5.9.4]. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and Public Right of Way (PRoW) network. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse effects would not be expected as set out in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] has considered the potential contribution of noise effects on recreational amenity and it is considered that the limited and not significant levels of effect ascribed to noise impacts would not further increase the levels of effect on footpath users in the Order Limits.
2.12	4.2.21	Comment that the Applicant's Site Selection Report does not demonstrate that flatter, more visually contained or less sensitive land within or beyond the search area was unavailable or unsuitable.	As noted within the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]), the Applicant established a Search Area which extended up to 10km from the National Grid East Claydon Substation. The Search Area was defined and restricted by the commercial viability of the project, considering the capacity, distance from the grid connection, underground cable costs, capital costs and market conditions at the time. Therefore, land beyond the Search Area would not be suitable. As set out in NPS EN-1 (2023) paragraph 4.3.24, a proposed project does not have to demonstrate that it is the best option, but rather that it is acceptable under the provision of the relevant policy. Further, NPS EN-1 (2023) paragraph 4.3.9 states that 'this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective'. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) confirms that the Applicant sought to avoid areas of particular environmental and landscape sensitivity when identifying suitable land within the Search Area. The Applicant's efforts in avoiding areas of particular environmental and landscape sensitivity were weighed against a wider range of considerations which generally sought to identify land as close to the point of connection as possible, in order to minimise the risks of environmental impacts, disruption to multiple landowners, challenges with crossings and process losses, and the cost and delay of a longer cable route.
2.13	4.2.22 & 4.2.23	Comment that a BESS proposal to the north of the East Claydon Substation is pending consideration and a BESS proposal (reference 23/03875/APP) has been approved and that these developments demonstrate that BESS development can be developed within the local landscape but that such development ought to be consolidated. Further comment that the Applicant has provided no evidence to suggest that engagement has been had with neighbouring BESS promoters to consider collectively reducing landscape and heritage harms.	The Planning History (Appendix 3 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) appendix acknowledges the approval of planning application 23/03875/APP which was allowed on appeal (Appeals Casework Portal reference APP/J0405/W/25/3360815) and the pending planning application 25/01297/APP. With regard to planning application 23/03875/APP, the Applicant wishes to note that Buckinghamshire Council refused this application and determined, among wider reasoning, that the application would have a "significant adverse impact on visual amenity and on the landscape character at the site, local and landscape character area levels. Furthermore, the cumulative effects of the proposal with Tuckey Farm (consented permission) and the existing East Claydon sub-station would lead to cumulative visual and landscape character effects which would be significantly adverse". The Applicant does not consider the reason for refusal to be consistent with Buckinghamshire Council's position in the LIR. Notwithstanding the above, the Applicant notes this comment and draws Buckinghamshire Council's attention to ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] which acknowledges the removal of BESS from Field E23 at the targeted consultation stage. This change sought to remove the overall number of 'larger elements' in Parcel 3, which would be in proximity to the other locally

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			consented and proposed schemes noted by Buckinghamshire Council. This design amendment positively enabled ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] to conclude that “<i>no significant adverse effects are reported on the visual amenity of residents of Botolph Claydon or any other settlement in the Order Limits</i>”. Had BESS development been retained in Field E23, the DCO Application would have reported increased adverse significant effects to LCA 5.7 (increasing from moderate (significant) to major/moderate (significant) in PEIR scenario 2) and additional adverse significant visual effects for residents of Botolph Claydon (significant for both PEIR scenarios 1 and 2). As set out in Consultation Report Appendices K-3 [EN010158/APP/5.2] [APP-030] Buckinghamshire Council's response to the targeted consultation was limited to matters of noise and vibration concerns and a wider and increasing concern for 'cumulative noise impacts in the wider area' with there being two other BESS developments proposed in proximity to the National Grid East Claydon Substation. The design amendment to remove the BESS from Parcel 3 was therefore considered by the Applicant to respond positively to this feedback. The Applicant has engaged with the neighbouring BESS developers on a range of matters including highways, construction and landscape and will continue to engage with them throughout the construction process. Commitment to this engagement in respect of transport matters is included within the Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.3] which confirms that “<i>Consultation on the timings of movements will also be undertaken with the HS2 Transport Officer and other developers to coordinate haulage operations that may use the access route during the construction period in order to minimise the cumulative impact on communities and road users.</i>”
2.14	4.2.24	Comment that part of the consented BESS proposal (reference 23/03875/APP) previously overlapped with land within the Order Limits and that Buckinghamshire Council therefore considers it reasonable for the Applicant to re-consider this land for some or all of the BESS.	The Applicant notes that, through the evolution of the Proposed Development, the maximum extent of overlap with the redline boundary of planning application 23/03875/APP was limited to Field E10, the land immediately adjacent to this field to the west of Claydon Brook, and Fields SA55 and SA56 to the east of Claydon Brook. As noted in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], Field E10 was discounted for BESS development due to the presence of higher flood risk and offsetting requirements from overhead lines and pylons which transect the field. Fields SA55 and SA56 were discounted for BESS development due to the presence of high flood risk areas and the fact that this land has been included within the Order Limits for the provision of the Abnormal Indivisible Load access off East Claydon Road. Notwithstanding the reasoning above and as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are “<i>vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision</i>”. Paragraph 4.3.28 of NPS EN-1 (2023) goes on to state that such alternatives should, wherever possible, be identified “<i>before an application is made to the Secretary of State</i>”. As noted in Section 7 of the Consultation Report [EN010158/APP/5.1] [APP-020], the feedback received from Phase Two Consultation, along with ongoing environmental assessment and technical work, resulted in a number of changes to the proposals. There were two changes which were consulted on during a targeted consultation which took place between 21 May 2025 and 16 July 2025. One of the two changes consulted on included the identification a single preferred layout for the Rosefield Substation, BESS and Main Collector Compound. Buckinghamshire Council responded to this consultation with regard for the BESS. The Council's comments were limited to matters of noise and vibration concerns and a wider and increasing concern for 'cumulative noise impacts in the wider area' with there being two other BESS developments proposed in proximity to the National Grid East Claydon Substation.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Buckinghamshire Council's response also recognised the BESS location had been confirmed through this consultation but that there was a maintained concern with cumulative developments.
2.15	4.2.25	Comment that Buckinghamshire Council's Relevant Representation identified that the currently proposed BESS location (Fields D8 and D9) is highly sensitive and that there is preference for the BESS to be located adjacent to or behind the existing East Claydon Substation. Further comment that this relocation would reduce setting harms and that this is a key change to make the Proposed Development acceptable in principle.	As set out in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and summarised in Appendix 2 to this document, there are a number of reasons why the proposed BESS has been located in Fields D8 and D9 rather than closer to the existing National Grid East Claydon Substation in Parcel 2. As set out in the response to paragraph 4.2.19 of the LIR above, Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape, with higher landform behind it, when viewed from the east and south, thus reducing its prominence on the skyline. Based on the operational noise assessment and iterative layout design, the BESS has been located to ensure cumulative operational noise remains within the required limits, when considered alongside other existing and/or approved developments, particularly the East Claydon BESS. The location of the National Grid East Claydon Substation and the consented East Claydon BESS limit the locations within Parcel 3 where the BESS could be located whilst ensuring that operational noise remains within the required limits. As set out at page 59 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the potential impacts of the BESS 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/6.2.2]. The Applicant has concluded that the harm to significance would be less than substantial and that the effects would be not significant, a conclusion which Historic England concurs with for those assets which it has considered within its Relevant Representation [RR-109] (Botolph Claydon and Middle Claydon Conservation Areas). The Applicant notes that if the BESS were to be located elsewhere within Parcel 3 then Fields D8 and D9 would be alternatively used for Solar PV development and that the impacts to Botolph Claydon Conservation Area, East Claydon village, and the listed buildings within them would not be materially reduced. As noted in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] Fields D8 and D9 fall within the same LCA (5.7) as the majority of fields in Parcel 2 and are hence considered to have the same landscape sensitivity. As discussed at page 314 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the BESS was removed from Field E23 of Parcel 3 following feedback received during Phase Two Consultation, in part to address feedback in relation to views from Botolph Claydon and East Claydon. The Applicant's response to paragraphs 4.2.26 and 4.2.27 of the LIR below sets out why locating the BESS in Fields E10 and/or E11 is not considered appropriate.
2.16	4.2.26 & 4.2.27	Comment that the Applicant's letter to Buckinghamshire Council regarding the location of BESS discounts Fields E10 and E11 on the basis of broad, unquantified constraints (pylon clearances, areas of higher flood risk, and potential visual/noise effects to Sion Hill Farm), though no assessments are provided to enable determination of this. Further comment that these reasons for discounting Fields E10 and E11 arise elsewhere within the Order Limits but are only used in the discounting of these fields.	Appendix 1: Letter to Buckinghamshire Council on BESS Locations to this document has been provided to submit the Applicant's referenced letter into Examination. Appendix 1 demonstrates how the Applicant has responded to one of the 'three key strands' informing the Council's inability to support the Proposed Development, relating to moving the location of the BESS, as set out in the Council's Relevant Representation [RR-026]. The letter sets out the design rationale and amendments to the location of the BESS, as drawn from the DCO Application documents. As set out in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047], Rosefield Substation is proposed in Parcel 3. The location of Rosefield Substation was refined during design stages 2 and 3 to respond to further engagement with National Grid on the proposed replacement National Grid East Claydon Substation, landscape and visual assessments and noise modelling, and reduce the maximum possible length of the Grid Connection Cable Corridor between the Rosefield Substation and National Grid East Claydon Substation. Shorter distances

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			have commercial and energy efficiency advantages and would also minimise environmental effects and temporary disruption associated with construction. Rosefield Substation is therefore proposed in Fields E11 and E20, with the maximum parameter in plan form allowing for the uncertainty of the location of the National Grid East Claydon Substation extension. The extent of the area for Rosefield Substation shown on Sheet 7 of the Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007] is subject to further discussion with National Grid, but is based on a current working layout for Rosefield Substation and indicates that it is likely that the substation will require both Fields E11 and E20 to accommodate it, within the 60,000m² footprint secured by the Design Commitments [EN010158/APP/5.9.4]. Given the constraints and design process that have been followed to locate the Rosefield Substation, Field E11 has been allocated for Rosefield Substation rather than BESS. Locating the BESS within Fields E10 and E11 has the potential to cause significant adverse noise effects at Sion Hill Farm during the operation (including maintenance) phase of the Proposed Development. This would be a function of: • the reduced separation distance to Sion Hill Farm (including fields used by livestock), relative to the current location; • the resultant increase in noise emitting infrastructure within Parcel 3, that would result in higher noise levels at Sion Hill Farm; and • the inter-project cumulative effects with other developments in the vicinity of Parcel 3, including the National Grid East Claydon Substation Extension and the East Claydon BESS. The existing overhead lines and pylons are shown on the Ordnance Survey mapping of ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3] [APP-061] and the Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1.2] [AS-004]. There is currently uncertainty related to the changes to the overhead lines that may result from the proposed National Grid East Claydon Substation extension. However, as is noted in National Grid Electricity Transmission Limited (NGET)'s Written Representation [REP1-130] and response to Examining Authority's Requests for Information [AS-037], NGET requires an easement of 30m either side of a tower, its base and the overhead lines that run between them. This gives rise to a 60m easement in diameter from NGET's assets and this significantly reduces the capacity of Fields E10 and E11 to facilitate BESS development. In terms of flood risk, Annex 1: Proposed Development's spatial overlap with Flood Zone areas and Annex 2: Proposed Development's spatial overlap with Surface Water Flood Risk areas to Appendix 5 - Sequential and Exception Tests of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] spatially demonstrate the extent to which there is overlap between the operational elements of the Proposed Development and Flood Zone and Surface Water risk areas. This demonstrates the flood risk constraint on Field E10 and along the south eastern side of Field E11. For Field E10, the area outside the flood risk constraint would be largely impacted by the pylon easements referred to above. The scenario for BESS in Fields E10 and E11 has not been assessed in the Residential Visual Amenity Assessment for Sion Hill Farm. However, it is not considered that likely significant effects would vary from those as already reported in ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]. In terms of mitigation of visual impacts, following Phase Two Consultation, the allocation of Fields E11 and E20 was prioritised for the location of the Rosefield Substation away from Fields E21-E23 in order to reduce visual impacts on users of the North Buckinghamshire Way/Midshires Way, local PRoW and residents of Botolph Claydon.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
2.17	4.2.28, 4.2.29 and 4.2.30	Comment that, without full appraisal, Fields E10 and E11 remain credible and potentially preferable alternatives for the location of BESS. Further comment that both fields are more visually contained within Parcel 3 and would also move BESS away from sensitive residential receptors. Further, comment that Buckinghamshire Council concludes the Applicant has not robustly justified the rejection of Fields E10 and E11 from BESS development.	As confirmed in Appendix 1: Letter to Buckinghamshire Council on BESS Locations to this document and expanded on above in relation to paragraphs 4.2.26 & 4.2.27 of the LIR, the constraints relating to locating the BESS in Fields E10 and E11 are set out in many of the DCO Application documents. Furthermore, and as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as proposed in the made comment, that are <i>"vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision"</i> and that such alternatives should be identified <i>"before an application is made to the Secretary of State"</i>. Parcel 3, with much of the Site, lies within an area of <i>"rolling lowland and shallow valleys with relatively gentle variations in height ranging from between 90m AOD to 120m AOD"</i> as described at paragraph 10.5.10 of ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]. As shown by ES Volume 3, Figure 2.3: Topography Plan [EN010158/APP/6.3] [AS-020], Fields E10 and E11 are some of the lower lying areas of Parcel 3 and the Site as a whole, with higher ground to the east and west that would have views towards BESS located in these fields. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] and the supporting ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] identify a number of locations where there would be visibility of construction and/or elements of the Proposed Development in Fields E10 or E11 with the current design. In terms of sensitive residential receptors, as set out in response to paragraphs 4.2.26 & 4.2.27 above, it is not considered that likely significant effects would vary from those as already reported for Sion Hill Farm in residential visual amenity terms, and locating the BESS within Fields E10 and E11 has the potential to cause significant adverse noise effects at Sion Hill Farm during the operation (including maintenance) phase of the Proposed Development.
Energy Generation and the Status of the Grid Connection			
2.18	2.2.1	Comment recognising the national need to accelerate the deployment of renewable and low-carbon electricity generation to meet the UK's legally binding Net Zero target and the Government's mission for a fully decarbonised power system by 2035.	The Applicant notes this comment and welcomes Buckinghamshire Council's recognition of the national need to accelerate the deployment of renewable and low-carbon electricity generation. The Statement of Need [EN010158/APP/5.6] [APP-036] provides further detail on the urgent need for an unprecedented capacity of new low carbon schemes to come forward to support achievement and maintenance of the government's clean power target by and beyond 2030.
2.19	2.2.3	Comment recognising the direct support of co-locating solar with Battery Energy Storage Systems (BESS) in supporting national energy security.	The Applicant notes this comment. Section 7.9 of the Statement of Need [EN010158/APP/5.6] [APP-036] details the support that co-located BESS developments provide to solar schemes in helping to achieve the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering Net Zero carbon emissions by 2050.

Table 3-3: Biodiversity and Ecology

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Adequacy of the Assessments and Surveys			
3.1	4.3.1	Comment that the Council has concerns about the adequacy of surveys and that datasets are outdated. Further comment raising concern with the fragmentation of ecological networks, hedgerow and habitat loss and insufficient arboricultural baseline evidence.	The Applicant notes that this comment is not accurate as the CIEEM guidance note¹ on the age and validity of ecological survey data does not simply impose a blanket two year validity window, it's more nuanced than this and depends upon a number of factors including if there has been any significant material change to on-site conditions, noting that it must be recognised that any survey work forms a snapshot in time. As detailed within the Applicant's response to Buckinghamshire Council's [RR-026] in the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant considers that the ecological survey effort and data set is adequate to inform a complete and detailed assessment that fully considers impacts of the Proposed Development on the relevant ecological receptors as provided within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]. The Proposed Development has been designed to ensure the retention and protection of habitats that are considered to be of higher value to biodiversity including woodland, ponds, watercourses, ditches and the majority of hedgerows and arable field margins, with loss of hedgerows and individual trees kept to a minimum where practicable, with re-instatement of hedgerows undertaken in the majority of cases. The vast majority of infrastructure 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. Mitigation planting includes the creation and enhancement of extensive areas of grassland, hedgerows, arable margins, ponds and scrub and tree planting that has been designed to create a coherent ecological network to link the Site to the wider landscape, ensuring the Site will continue to support a range of species, which is detailed and secured by the Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. All arboricultural data informing the assessment has been verified and collected on site by a suitably qualified arboricultural consultant in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction ('BS 5837:2012') and as detailed within ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The arboricultural baseline is therefore considered sufficient to support the assessment of the Proposed Development.
3.2	4.3.3. to 4.3.48	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), NPPG, and the Vale of Aylesbury Local Plan (2013 – 2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.3.3 to 4.3.48 the Local Impact Report.
3.3	4.3.50	Comment which welcomes the Applicant's provision of further ecological information before Deadline 1 but goes on to note continued concern that the Applicant is not proposing changes to the design of the Proposed	A number of application documents were amended and new documents submitted at Deadline 1, with those relevant to biodiversity being the Bat Technical Study [EN010158/APP/8.5] [REP1-105] , ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] , ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP/6.4.2] [REP1-062] , ES Volume 4, Appendix 7.17: Biodiversity

¹ chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		Development, following comment from Buckinghamshire Council and Natural England.	Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060], Outline CEMP [EN010158/APP/7.2.3] and Outline LEMP [EN010158/APP/7.6.3]. The information presented within these documents does not change the overall assessments for ecological receptors presented within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], therefore the design of the Proposed Development as currently stands, which includes sufficient embedded mitigation measures, does not need to be amended. The overall design of the Proposed Development was altered significantly throughout the consultation process as a result of discussions held with stakeholders including Natural England and Buckinghamshire Council which included an overall reduction on Solar PV area, 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. In addition, setbacks from hedgerows and woodland blocks that were considered key for commuting bats, in particular Bechstein's bats, were increased.
3.4	4.3.55, 4.3.56, 4.3.57 and 4.3.58	Comment noting that ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] [REP1-036] ('the Biodiversity Chapter') identifies residual effects from the Proposed Development on Bechstein's Bat (roosting, foraging, and commuting) as being potentially adverse, long-term, permanent (for the duration of operation) and potentially significant at the district level but that the Chapter concludes this potentially significant effect as not equating to 'significant harm'. Further comment that the Applicant has been unable to conclude whether effects are likely to be significant or not and that Buckinghamshire Council considers the effect to be significant on the Bechstein's Bat population at the national level.	As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 18) 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. A detrimental effect of solar farms has been suggested for some bat species, but the studies that have concluded this are short-term and the evidence limited; there are no longitudinal (ie. before /after) studies of effects on well-designed well-managed established solar farms. Nonetheless, the assessment of 'potentially significant' has been applied on a precautionary basis because the mechanism by which any such effect might manifest is uncertain. However, given the mitigation in place, it is hard to conceive of an effect that would result in significant detriment sufficient to conflict with strategies for nature recovery.
3.5	4.3.61	Comment that notes disagreement with the Biodiversity Chapter's conclusion that the predicted impacts of the Proposed Development would not be of a scale that would impact the favourable conservation status (FCS) of Bechstein's bat. Further comment that the Bernwood population of Bechstein's bat is estimated to comprise 1.4% of the UK population and that any extinction of this population would lead to a reduction in the FCS of the species and that this would therefore be considered to be significant harm by Natural England's definition.	Extinction of a local population would indeed impact on FCS but this outcome is neither predicted nor likely, as outlined above in response to point 3.4 . Woodlands are being retained/protected, commuting corridors (flightlines) are being strengthened/buffered and foraging opportunities are being improved as part of the Proposed Development, which is detailed and secured by the Outline LEMP [EN010158/APP/7.6.3] .
3.6	4.3.62	Comment that just because an assessment concludes a potentially significant effect at the district level which	Extinction of a local population would indeed impact on FCS but this outcome is neither predicted nor likely, as outlined above in response to point 3.4 . Woodlands are being retained/protected, commuting corridors

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		would not equate to significant harm at the species level, this should not detract from the significance of the local impact. Further comment that there is only one other known breeding population of Bechstein's bats at the County level and as such extinction at this level would be significant.	(flightlines) are being strengthened/buffered and foraging opportunities are being improved as part of the Proposed Development, which is detailed and secured by the Outline LEMP [EN010158/APP/7.6.3] .
3.7	4.3.64	Comment that many factors contribute to the difficulty of assessing the impacts of the Proposed Development on Bechstein's bat, including: - Potential impacts of the construction and operation (including maintenance) phases are indirect (e.g., noise and vibration) which make it difficult to analyse and quantify the effects without specialist research; - Potential impacts being cumulative in nature as a result of the Proposed Development but also High Speed 2, Greatmoor Energy from Waste and the Calvert Landfill; - Limited research on the effects of solar farms on bat behaviour (noting that Council claims that some studies indicate that solar farms may reduce bat activity); - The assessment of impacts' reliance on Natural England's NECR558 Report which uses survey data from 2012 and 2013 to identify important roosts, map core foraging areas, and commuting routes, and understand the likely population size. Comment that the Applicant has not undertaken radiotracking surveys. Further comment that additional surveying may identify new areas of importance for roosting and commuting, though it is agreed that such surveying would not alter the conclusion of the importance and vulnerability of roost concluded by the Applicant; - Lack of surveying to determine the presence of roosts within trees and potential disturbances to	ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has robustly assessed the potential impacts of the Proposed Development on Bechstein's bats during all phases including construction and operation (including maintenance). The Bat Technical Study [EN010158/APP/8.5] [REP1-105] submitted at Deadline 1 provides further information regarding the potential impacts that could occur from both construction and operational noise and vibration, using data from Case Study 38 in Appendix 4 and a template included in Appendix 5 of the Bat Mitigation Guidelines (2025)². This template has been accepted by Natural England in licence applications dealing with potential noise impacts (including those from HS2). The study (which includes some project-specific noise data) concludes that neither construction nor operation are considered to represent a significant source of noise or vibration disturbance; however, some pre-construction assessments of a limited number of trees may be required depending on haul route layout and programme. ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] fully assesses the potential for intra cumulative impacts to occur from the Proposed Development and for inter cumulative from other developments including High Speed 2, Greatmoor Energy from Waste and the Calvert Landfill in combination with the Proposed Development. Where the assessment has concluded that there is the potential for cumulative effects, this has been flagged, with a <i>potentially</i> significant inter-project cumulative residual effect identified for Bechstein's bats as these projects fall within the Core Sustenance Zone (CSZ) of Bechstein's bats, and inter-project cumulative residual effects are anticipated if Bechstein's bats are displaced from extensive areas of their CSZ. No additional mitigation has been flagged as required, as mitigation measures for the Proposed Development are considered likely to maintain foraging and commuting habitat for bat species. 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/6.2.3]. However, as stated within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 20 and response to RR-020 on page 286), 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 and the evidence base for impacts is very limited. 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 and enabling their continued use of the landscape, 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, a

² 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. [Available at: <https://cieem.net/wp-content/uploads/2023/09/Bat-Mitigation-Guidelines-2025-V1.2.pdf>; Accessed on 1 April 2026.]

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		significant roosts in key areas (e.g., between Sheephouse Wood and Shrubs Wood); and • An assumption that the design commitments will be effective in allowing for the continued use of the landscape by Bechstein's bats.	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. The Applicant has committed within the Outline LEMP [EN010158/APP/7.6.3] to a detailed post construction monitoring programme. In addition, engagement is ongoing into further research opportunities to expand the evidence base with regards to bats and solar panels. The design commitments take into account the foraging behaviour of Bechstein's bats and double the amount of grazed grassland habitat, as well as providing buffers along hedgerows and woodland habitat that relate to the effective range of Bechstein's bats echolocation range. ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] clearly states that consultation has been undertaken with Natural England to agree the ZOI, survey study area extent and types of surveys required to inform the assessment for bats (including in areas between Sheephouse Wood and Shrubs Wood). The Applicant also consulted with Natural England with regards to survey methodology for bats. During a meeting (11 March 2025), Natural England officers have agreed further bat survey would not be helpful and that there is sufficient information 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) ('NECR558 Report') and additional information from HS2. The results of the surveys presented within this report, along with the findings presented within ES Volume 4, Appendix 7.10: Bat Activity Survey Report (2024) [EN010158/APP/6.4] [APP-096], ES Volume 4, Appendix 7.16: Paired Static Detector Survey Report (2025) [EN010158/APP/6.4] [APP-102] and Bat Technical Study [EN010158/APP/8.5] [REP1-105] have identified key areas of bat activity within the Order Limits and the Applicant has applied bespoke mitigation within these areas as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3]. The assessment of impacts does use Natural England's NECR558 Report as this combines radio-tracking data from a number of years between 2012 and 2022. The statement that this only includes data from the earliest years is incorrect, (as clearly set out paragraph 4 of the Executive summary of that report). No identified Bechstein's bat roosts are located within the Order Limits. Bats in the Bernwood area have been subject to multiple radio tracking surveys since 2012 every four years; the frequency is designed to ensure this invasive technique does not put undue stress onto the Bernwood bat population. From a welfare perspective, undertaking additional radio-tracking surveys for the Proposed Development in between HS2 sessions is not recommended (or necessary), and this has been agreed with Natural England (see Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]). The next bout of HS2 radio-tracking is scheduled for 2026. The information presented within the new and updated documents submitted at Deadline 1 relevant to effects on biodiversity and ecology do not change the overall assessments for ecological receptors presented within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], therefore the Applicant is of the opinion that the design of the Proposed Development as it currently stands, which includes sufficient embedded mitigation measures, does not need to be changed further.
3.8	4.3.68	Comment that the Proposed Development will result in changes to habitats that will change the existing use of the landscape by various wildlife, including those species of national importance. Further comment that,	ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] includes a full assessment of potential impacts that could arise from the Proposed Development on species of principal importance for conservation, including ground nesting bird species, non-nesting birds, wintering birds, great crested newt, and otter. The assessment has considered that taking into account both the proposed embedded and additional mitigation measures there

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		whilst not valued higher than local or county importance, the Site supports a range of species of principal importance for conservation, including ground nesting bird species, non-nesting birds, wintering birds, great crested newt, and otter. Further comment that no residual impact is listed in the ES for great crested newts and otters and that compensatory planting will take years to establish in a meaningful way.	would not be a significant adverse residual impact on these receptors, and in the case for ground nesting birds, a long-term, beneficial effect in quantity of foraging habitat and quality of nesting habitat once fully established during operation which is considered to be significant at the Local level. The Proposed Development has been designed to ensure the retention and protection of habitats that are considered to be of higher value to biodiversity including woodland, ponds, watercourses, ditches and the majority of hedgerows and arable field margins, with loss of hedgerows and individual trees kept to a minimum with re-instatement of hedgerows undertaken in the majority of cases. The vast majority of infrastructure 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. Mitigation planting includes the creation and enhancement of extensive areas of grassland, hedgerows, arable margins, ponds and scrub and tree planting that has been designed to create a coherent ecological network to link the Site to the wider landscape, ensuring the Site will continue to support a range of species of principal importance for conservation, which is detailed and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. Regarding impacts to great crested newt at the construction phase ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] clearly states at paragraph 7.10.31 the residual effect during construction taking into account embedded and additional mitigation is anticipated to be adverse, short-term and temporary and not significant. Regarding impacts to otters at the construction phase ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] clearly states at paragraph 7.10.73 taking into account embedded and additional mitigation there is not anticipated to be an adverse effect on otter, which is considered to be not significant. Regarding decommissioning impacts, ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] clearly states at paragraph 7.10.146 the likely impacts at decommissioning will be broadly similar to those during construction. However, biodiversity gains achieved during operation may be lost if land returns to intensive agriculture. This means decommissioning could have greater negative effects on habitats than construction. Habitats and protected/notable species may face temporary habitat loss and disturbance during this phase. The Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.3] states that appropriate mitigation measures implemented during decommissioning would be based on the results of the updated ecology surveys to mitigate any significant adverse effects.
3.9	4.3.70 and 4.3.71	Comment that significant numbers of ground nesting birds have been identified on Site and that location(s) of compensation site(s) will be required and an accompanying survey will need to be undertaken on those site(s) to understand existing usage. Further comment that only panelled areas (not temporary impacts, such as cabling routes) have been assessed, and so insufficient evidence has been provided to assess the impact of the Proposed Development on ground nesting birds.	It is correct that only Solar PV panel areas have been subject to breeding bird surveys. However, as outlined in ES Volume 4, Appendix 7.4: Breeding Bird Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-090] and ES Volume 4, Appendix 7.12: Breeding Bird Survey Report (2024) (Confidential) [EN010158/APP/6.4] [APP-098], a significant area has been subject to breeding bird surveys over 2 survey periods (2021/2022 and 2023/2024) and as the cable route and other areas support identical habitat to areas that have been subject to breeding bird surveys, the Applicant is confident that it can predict the likely usage of the cable route corridor and other areas by breeding birds (including ground nesting birds). Due to the temporary nature of the cabling works no significant effects are envisaged as land would be returned to agricultural use and could be continued to be utilised by breeding birds as currently used. The Outline LEMP [EN010158/APP/7.6.3] secures a commitment to undertaking cabling works outside of the breeding bird season or failing this subjecting these areas to nesting bird checks to ensure legislative compliance with regards to nesting birds. Finally, as detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], (see response to [RR-020] at page 288) the Outline LEMP [EN010158/APP/7.6.3] outlines a suite of mitigation

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			measures designed to benefit ground nesting birds along with a monitoring programme which would be secured by the Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.10	4.3.72	Comment that further assessment of the numbers of ground nesting birds that will be displaced are required alongside a mitigation plan which provides replacement habitat at a 2:1 ratio.	The Applicant does not agree that additional assessment of the number of ground nesting birds that may be impacted by the Proposed Development is required or that mitigation at a ratio of 2:1 for habitat loss is required - instead, the mitigation requirement has been based on the number of birds observed during surveys. As presented in the Outline LEMP [EN010158/APP/7.6.3] at paragraphs 4.5.22 to 4.5.25 it is estimated that there were 67 skylark territories (used as a proxy for all ground nesting species) across the area subject to breeding bird surveys (473 ha). However, since breeding bird surveys were undertaken, the design of the Proposed Development has reduced substantially so that the actual area where ground nesting birds may be displaced by solar PV panels is only 279ha and it is estimated that this area supports 39 breeding pairs. Therefore, mitigation is based on the appropriate and proportionate requirement to mitigate for 39 breeding pairs. It is considered that with appropriate management the carrying capacity of the areas set aside for ground nesting bird mitigation (95ha) would support a greater carrying capacity of nesting pairs than the current arable farmland. Finally, as indicated in the Outline LEMP [EN010158/APP/7.6.3] provision of ground nesting habitat is only one of a suite of measures designed to benefit nesting birds which include increasing the availability of insect prey during the summer months as well as provision of a source of winter seed. The Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-020] at page 288) indicates that with appropriate management solar farms can continue to support a diverse range of breeding bird species.
3.11	4.3.73	Comment that a monitoring programme is required due to the significance of the breeding birds identified on the Site and the measures proposed to maintain and enhance habitat for these species. Further comment that the Outline LEMP only proposes ground nesting bird monitoring. Final comment that a wider farmland bird monitoring programme to inform on the habitat enhancement and creation measures' success is expected.	The mitigation measures proposed include retention of woodland, the majority of hedgerows and associated buffers to benefit other non-ground nesting species. The Applicant considers that monitoring for breeding bird species would include all farmland bird species not just ground nesting ones and notes that the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] , (see response to [RR-026] at page 30) indicates that the final monitoring programme within the Outline LEMP [EN010158/APP/7.6.3] would include wintering and breeding birds and would be submitted to and approved by the relevant planning authority (in consultation with the and Natural England. This commitment is secured by Requirement 7 of the draft DCO [EN010158/APP/3.1.4] . However, the Outline LEMP [EN010158/APP/7.6.3] will be updated at Deadline 2 to further clarify this position.
3.12	4.3.74	Comment that the Outline LEMP notes the mention of bird boxes but that their locations and specification need to be provided. Further comment requesting the Applicant to engage with Bucks Owl & Raptor Group since there are existing boxes around the Site which this group monitors annually.	The locations of nesting or potential nesting locations of birds protected under Schedule 1 of the Wildlife and Countryside Act 1981 was kept confidential to prevent disclosure of locations to members of the public. Table 3.2 of the Outline CEMP [EN010158/APP/7.2.3] has a commitment to undertaking a pre-construction survey for Schedule 1 species and the Applicant would consult with the Bucks Owl and Raptor Group at this stage. The provision of bird boxes outlined in the Outline LEMP [EN010158/APP/7.6.3] would have specification and location agreed in the detailed Landscape and Ecological Management Plan which is to be submitted to and approved by the relevant planning authority (in consultation with relevant local groups and Natural England. This commitment is secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.13	4.3.79, 4.3.80 and 4.3.81	Comment that the Local Nature Recovery Strategies (LNRS) are core to achieving Goal 1 of the Environmental Improvement Plan (EIP) and that the key measures within the published Buckinghamshire	The Applicant is fully aware of the importance of the LNRS. Mitigation planting is detailed in the Outline LEMP [EN010158/APP/7.6.3] (and secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]) and includes the creation and enhancement of habitats, where appropriate, in line with the LNRS in order to achieve Goal 1 of the Environmental Improvement Plan (EIP.) This includes the following:

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		and Milton Keynes LNRS are M122, M120, M110 and M1.	• <i>M122: Take action to restore populations of blackthorn butterflies and moths</i> – the design of the Proposed Development has ensured that habitats most likely to support populations of black and brown hairstreak butterflies and moths (blackthorn scrub in woodland and hedgerows) have been mostly retained (in relation to hedgerows and individual trees) or fully retained (in relation to ancient woodland). New hedgerow planting and new scrub planting is proposed, including hedgerows that will be planted and enhanced ahead of construction works commencing. Improvement to existing hedgerows will also be undertaken by bolstering any gaps with a diversity of appropriate native species including Blackthorn where required. Management of woodland, hedgerows and scrub habitat that contain Blackthorn would be undertaken in such a manner to ensure the Blackthorn resource is maintained. • <i>M120: Take action to restore populations of the Duke of Burgundy butterfly</i> - the design of the Proposed Development has ensured that habitats most likely to support populations of the Duke of Burgundy butterfly within the vicinity of the Order Limits (ancient woodland) are fully retained and appropriate buffers implemented. • <i>M110: Take action in Target areas for Species Recovery. This includes Bechstein's bat as well as other bat species</i> – Given the sensitivity of the location of the Proposed Development, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to include bespoke mitigation measures in areas where higher bat activity has been recorded and areas that have been flagged as key for Bechstein's bat focused on the retention, creation and enhancement of habitats. 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 to create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. • <i>M1: Buffer and connect ancient woodlands, while preserving and enhancing other Priority Habitats such as chalk grassland, floodplain meadows</i> - 30m buffers with an additional 5m from solar panels to the security fence are proposed from all ancient woodland. Further, a minimum 10m buffer with an additional 5m from solar panels to the security fence from all hedgerows is proposed linking the blocks of woodland with habitat creation and enhancement proposed within the buffer areas to ensure connectivity is maintained between the woodland blocks and to the wider landscape. No areas of chalk grassland or floodplain meadows have been recorded within or adjacent to the Order Limits. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises and provides assessment of the Proposed Development against Paragraph 5.4.34 of NPS EN-1 (2023) through Appendix 4 (Policy Compliance Assessment Tables). Paragraph 5.4.34 of NPS EN-1 (2023) specifically recognises that projects should consider and provide advances on the opportunities identified through LNRS. As mentioned above, and in Appendix 4 to the Planning Statement [EN010158/APP/5.7.3] [REP1-016], Goal 1 of the EIP and the key measures within the Buckinghamshire and Milton Keynes LNRS are supported.
3.14	4.3.82	Comment that the identified potentially significant adverse effects on Bechstein's bat appears to contravene Goal 1 of the EIP and the key measures within the LNRS and national policy.	Please see the Applicant's response provided at point 3.3 above regarding potentially significant adverse effects to Bechstein's bats. Appendix 4: Policy Compliance Assessment Tables to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] provides an assessment of the Proposed Development against Paragraph 5.4.34 of NPS EN-1 (2023) with regard for LNRS. The assessment of the Proposed Development against this paragraph confirms that maximising the restoration, creation, and enhancement of wider biodiversity has been key to the evolution of

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			the Proposed Development's design. As detailed within the Outline LEMP [EN010158/APP/7.6.3] (and secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]), the Proposed Development seeks to establish, among other things, new habitat for invertebrates, reptiles, amphibians, small mammals and birds and wider vegetated cover for foraging and dispersal, to maintain bat flight lines and increase foraging habitats across the landscape, therefore helping to support the achievement of Goal 1 of the EIP and the key measures within the LNRS.
3.15	4.3.90	Comment that Buckinghamshire Council considers there to be a high risk that the Proposed Development will result in significant effects for biodiversity at the local, and potentially, the national scale which weighs against approval of the Proposed Development.	The Applicant disagrees with this conclusion. ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] includes a full assessment of potential impacts that could arise from the Proposed Development on species of principal importance for conservation. The assessment has considered that taking into account both the proposed embedded and additional mitigation measures there would not be a significant adverse residual impact on these receptors, and in the case for ground nesting birds, a long-term, beneficial effect in quantity of foraging habitat and quality of nesting habitat once fully established during operation which is considered to be significant at the Local level. As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 18) 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.
3.16	4.3.91	Comment that there is an opportunity for the Proposed Development to contribute to research on the impacts of solar farms on biodiversity and for this to be taken as a positive outcome of the Proposed Development which would provide valuable scientific information to inform the development of future solar farms.	In order to further the evidence base of how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development, and the potential impacts to bats from high frequency noise from electrical infrastructure, the Applicant has already undertaken additional studies which were submitted at Deadline 1 (see Bat Technical Study [EN010158/APP/8.5] [REP1-105]). As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see the responses to [RR-026] at page 16, [RR-020] at page 300 and [RR-208] at page 378), the Applicant has committed within the Outline LEMP [EN010158/APP/7.6.3] to a detailed post construction monitoring programme. In addition, engagement is ongoing with regards to supporting further research opportunities to expand the evidence base with regards to bats and solar farms. Recently EDF has sponsored a PhD student in association with Exeter University looking at impacts of solar panels on biodiversity at its Longfield Solar Farm.
3.17	4.3.92	Comment that Buckinghamshire Council does not consider the survey works to date to be sufficiently detailed for there to be positive outcomes. Further comment that a sufficiently planned and detailed research project undertaken as part of the Proposed Development has the potential to positively impact biodiversity outcomes for future solar development.	As detailed above under the Applicant's response to paragraph 4.3.1 and within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] , the Applicant considers the survey effort is adequate to inform a complete and detailed assessment that fully considers impacts of the Proposed Development on the relevant ecological receptors as provided within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] . As outlined above under the Applicant's response to paragraph 4.3.92, the Applicant has committed within the Outline LEMP [EN010158/APP/7.6.3] to a detailed post construction monitoring

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			programme. In addition, engagement is ongoing with regards to supporting further research opportunities to expand the evidence base with regards to bats and solar farms.
3.18	4.3.92	Comment that the monitoring schedule for the Proposed Development needs to include monitoring changes to temporary flight lines of bats using a similar methodology to HS2.	These changes to the monitoring schedule are not proportionate as temporary flight lines are only likely to be required in a few areas (if at all). Secondly, unlike HS2 which <i>could</i> represent a continuous linear barrier, the Proposed Development does not prevent bats from accessing the many alternative ways of navigating the landscape using the network of linear features and it is known that even Bechstein's bats will cross open areas. Thirdly, there are unlikely to be enough bats commuting in any one location within the Order Limits to make monitoring changes to temporary flight lines a useful approach. Finally, the methods used on HS2 would be unlikely to provide information of how Bechstein's bats might use such temporary flight lines, as the two developments are not comparable and Bechstein's bat activity tends to be under recorded using standard methodologies.
3.19	4.3.94	Comment that arboricultural effects warrant distinct consideration from the Biodiversity Chapter given the Proposed Development's scale and the presence of Ancient Woodland, veteran and mature trees, and an extensive hedgerow network. Further comment that trees and woodland provide other services such as contributions to landscape character, cultural and historic value, soil stability, water regulation, and climate resilience.	The Applicant acknowledges that arboricultural features provide a range of functions beyond biodiversity, including contributions to landscape character, cultural and historic value, soil stability, water regulation, and climate resilience. The Applicant considers that arboricultural effects have been appropriately and robustly considered within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and ES Volume 4 Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4]. Arboriculture and ecology necessarily overlap on a scheme of this nature, particularly in relation to woodland edges, hedgerows, buffers and habitat interfaces. There is nothing inherently inappropriate in presenting these topics together. Accordingly, arboricultural effects have been given appropriate and proportionate consideration, both as a standalone topic and in conjunction with related environmental disciplines. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies tree groups and woodland belts as key structural landscape features, supported through the application of BS 5837:2012 category sub-classifications, including the '2' category (landscape value). This explicitly recognises the contribution of trees and groups to landscape character and visual amenity, alongside their arboricultural value. As set out within the Outline LEMP [EN010158/APP/7.6.3] the Proposed Development has been designed to retain and reinforce these functions, rather than diminish them. As set out in the Environmental Statement, "new structural planting, in the form of tree belts and hedgerows, will help to soften and screen built development and integrate it into the existing landscape, whilst also providing habitat for biodiversity. Planting will be designed and managed to complement the existing vegetation mix, structure and pattern of the landscape". This approach is informed by the Buckinghamshire & Milton Keynes Biodiversity Action Plan and wider landscape character studies, promoting native species planting, strengthening of hedgerows, and the addition of new hedgerow trees and woodland belts. The Proposed Development will therefore deliver: • Enhanced landscape structure and green infrastructure corridors, improving connectivity across the Site; • Retention and reinforcement of existing hedgerows and woodland features, maintaining their functional and cultural role; • Planting within Parcel 1 will respect the 'designed' character of the woodland blocks to the wider historic landscape of Claydon House; and • Additional planting and long-term management, ensuring resilience and continuity of arboricultural features.

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3.20	4.3.100, 4.3.101 and 4.3.102	Comment noting that the Applicant had confirmed that aerial (drone) survey information was used to inform the Arboricultural Impact Assessment and that this was intended to complement, rather than replace, ground-based survey work but that the Applicant has not explicitly confirmed that all data used has been comprehensively verified through ground-based survey on Site. Further comment recognising the benefits of aerial survey information in assisting assessments but that aerial survey information is not to be used reliably for full identification of relevant arboricultural parameters.	As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 42), the Applicant confirms that aerial (drone) survey data was utilised to inform the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] as a supporting tool for base mapping and spatial referencing. However, it is important to clarify that this data was not relied upon in isolation, nor was it intended to replace a BS 5837:2012 compliant field survey. All arboricultural data used within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has been comprehensively verified through ground-based survey undertaken on Site by a suitably qualified arboricultural consultant as stated within Section 3.1.1, 3.6.2 and Annex C of the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. This included direct inspection of trees and hedgerows, measurement of key parameters (including but not limited to stem diameter, height, crown spread, and physiological and structural condition), and categorisation in accordance with BS 5837:2012. In relation to paragraph 4.3.99, the Applicant acknowledges that woodland parcels and woodland edges, including Ancient Woodland, are sensitive receptors; however, it is not agreed that the Site as a whole should be characterised as having a uniformly high arboricultural sensitivity. As set out within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] the Site is predominantly agricultural land with trees largely confined to hedgerows, field boundaries and woodland blocks, resulting in a variable arboricultural baseline. Sensitivity is therefore feature-specific, with higher value attributed to elements such as Ancient Woodland and veteran trees, rather than the Site as a whole. Potential indirect impacts, such as those arising from construction activity or operational pressures, have been identified and addressed through embedded design measures and secured controls. Accordingly, whilst specific features within the Site are recognised as sensitive, the Applicant considers that this sensitivity has been appropriately reflected in the design and mitigation strategy, and that woodland edge effects are effectively avoided or minimised.
3.21	4.3.103	Comment noting that the Applicant has not always clearly or consistently classified woodland areas as being either groups of trees or woodland parcels. Further comment noting that this has implications for the assessment of woodland edge effect, buffer provision and the assessment of construction and operational effects.	As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 42), the tree data table within Annex A of ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] notes which groups are woodland parcels and which are ancient semi-natural woodland. The approach to classification within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has been undertaken in accordance with BS 5837:2012, which allows for the application of professional judgement in distinguishing between individual trees, groups, and woodland units based on site-specific characteristics. Appendix 3: Vegetation Removal Parameters of the Outline LEMP [EN010158/APP/7.6.3] sets out minimum buffer distances from edges of existing woodlands including groups, using National Forest Inventory 2021 data. These buffers are applied to the associated woodland features regardless of BS5837 prefixes. Accordingly, the Applicant considers that woodland edge effects, buffer provision and construction and operational effects have been appropriately and robustly assessed and considered in the ES.
3.22	4.3.104	Overarching comment that, notwithstanding further clarification from the Applicant, the current Arboricultural Impact Assessment does not provide a sufficiently robust baseline to assess the impacts of all phases of the Proposed Development.	The Applicant disagrees with this comment. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies and evaluates impacts arising from construction, access and highway works, and operational phases, including tree and hedgerow removals, pruning requirements, and potential Root Protection Area (RPA) incursions. The level of detail provided is robust and proportionate to the current stage of design within the DCO process. Once further refinement of layout and construction methodologies are provided at the detailed design stage the need for a site specific Arboricultural Method Statement will be required, which

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			is set out in the Outline CEMP [EN010158/APP/7.2] [APP-138] and secured by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4] .
3.23	4.3.105	Comment recognising that buffer distances and proposed points of access and infrastructure layouts are informed by the baseline established within the Arboricultural Impact Assessment and so the accuracy of this is fundamental to the accuracy of identifying impacts and effective avoidance and mitigation measures.	The Applicant agrees that the arboricultural baseline is fundamental to informing buffer distances, access routes, and infrastructure layout. As demonstrated within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] the baseline has been established through site-verified survey undertaken in accordance with BS 5837:2012, and has directly informed the design evolution of the Proposed Development and set appropriate offsets from arboricultural features.
3.24	4.3.109	Comment that the full arboricultural impact has not always been clearly defined, particularly where elements of the Proposed Development are described in outline or where there are construction activities proposed within buffer zones or in proximity to hedgerows and trees. Further comment that such encroachment into protection and buffer zones reflects a direct impact on retained arboricultural features.	The Applicant considers that ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2] clearly identifies and describes potential impacts on retained trees, hedgerows and groups, including direct losses, pruning requirements, and potential incursions into RPAs associated with construction, access and infrastructure works. The assessment adopts a reasonable worst-case approach, ensuring that all likely impacts, including those arising from proximity to retained features or within buffer zones, are appropriately considered at this stage. Encroachment within RPAs has detailed within Section 5.3 of ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2], page 33. The Applicant acknowledges that over a 40-year operational period, future tree growth and crown expansion have the potential to interact with infrastructure. However, it is not agreed that this gives rise to a material risk of incremental degradation of arboricultural value. The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase. These documents have been updated to state: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified". This inspection regime ensures that tree growth, condition, and any potential conflicts are proactively monitored and managed, allowing for early intervention where necessary. Any management, including pruning, will be undertaken in accordance with good arboricultural practice (e.g. BS 3998:2010- Tree work – Recommendations) and will be proportionate, avoiding unnecessary or harmful intervention.
3.25	4.3.111 and 4.3.137	Comment that the Applicant has provided limited information on arboriculture with regard for the decommissioning of the Proposed Development. Further comment that this phase may include excavation and the reestablishment of points of access and that it is currently uncertain how impacts on RPAs and sensitive arboricultural features would be avoided.	The Applicant acknowledges that detailed decommissioning methodology is not defined at this stage. However, appropriate and proportionate mitigation measures to avoid damage to retained trees and hedgerows during decommissioning are embedded within the Outline DEMP [EN010158/APP/7.4.3] . Furthermore, impacts to trees and RPAs will be managed through a detailed Decommissioning Environmental Management Plan, which will be agreed with the relevant planning authority prior to the decommissioning phase (as secured by Requirement 18 of the Draft DCO [EN010158/APP/3.1.4]). This will ensure that any works within buffer areas or in proximity to retained arboricultural features are properly controlled, supervised, and mitigated.
3.26	4.3.120	Comment noting that proposed accesses and highway works, including road widening in specific locations,	The Applicant acknowledges the Council's comments regarding potential encroachment into RPAs associated with access and highway works, and the need for consistency between ES Volume 4, Appendix 7.13:

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		have the potential to encroach into the root protection areas (RPAs) of retained trees. Further comment noting inconsistencies between the Arboricultural Impact Assessment and the Outline CTMP.	Arboricultural Impact Assessment [EN010158/APP/6.4.2] and the Outline CTMP [EN010158/APP/7.5.3] . The Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to show all impacts from highways works.
3.27	4.3.121	Comment noting that the Outline CTMP includes measures and requirements for works which typically require the excavation of highways verges. Further comment recognising the potential impact on RPAs and below-ground environments.	The Applicant acknowledges the Council's comments regarding potential encroachment into RPAs associated with access and highway works. However, these potential impacts have been identified and considered within ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2] , including the relationship between highway works and retained trees. Where interactions with RPAs are identified, these are clearly defined and capable of being avoided or minimised through detailed design refinement and appropriate construction methodologies. The updates submitted at Deadline 2 will also provide further clarity and alignment between the documents.
3.28	4.3.122 to 4.3.127	Comment that, in a number of cases, highway-related works are not clearly shown within the Arboricultural Impact Assessment plans and the potential impacts on RPAs and arboricultural features are not explicitly assessed. Further comment noting examples is provided: • 'Figure SK002' of the Arboricultural Impact Assessment plans shows hedgerow removal adjacent to Fields D7 and D8 but does not clearly assess impacts on adjacent trees; • 'Figure SK003' of the Arboricultural Impact Assessment plans, between Fields D44 and D45, show encroachment within the stated protection buffer of Oak T532, a veteran tree; • 'Figures SK005' and 'SK006' of the Arboricultural Impact Assessment plans show access crossings at junctions, but impacts are illustrated only on one side of the junctions, with hedgerow removal shown but not associated impacts on adjacent trees; • 'Figures SK007' to 'SK011' of the Arboricultural Impact Assessment plans show temporary highway measures. While these measures are intended to reduce impacts, they confirm that works will take place close to trees and hedgerows, with potential for soil compaction, root disturbance and additional vegetation loss that is not fully assessed within the Arboricultural Impact Assessment. Further comment that, where highway works are not integrated into the Arboricultural Impact Assessment	• In relation to comment Figure SK002 of the Outline CTMP [EN010158/APP/7.5.3], trees T546, T545 and G117 are shown for removal at this location within Tree Removal and Preliminary Protection Plan of ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] which clearly assess the effects of highway works. • In relation to comment Figure SK003 of the Outline CTMP [EN010158/APP/7.5.3]. The area shown is not a generic "protection buffer", but the veteran tree RPA for Oak T532, calculated in accordance with established guidance and best practice. The fact that the proposed road alignment lies at the edge of this RPA does not indicate any uncertainty or lack of clarity in the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and in relation to the identification of the scale and significance of potential impacts on roadside trees, hedgerows and veteran features. Rather, it transparently identifies a potential interaction between the layout and a known arboricultural constraint. The position of the tree, its dimensions, and the calculated RPA are clearly defined and robustly established within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The overlap reflects a design outcome influenced by multiple disciplines, including highways requirements, rather than any deficiency in the arboricultural baseline. It should also be noted that efforts have been made to avoid this constraint through design iteration, and further refinement remains possible at the detailed design stage to minimise or avoid impacts where practicable. Accordingly, the drawing does not demonstrate any need for further survey or verification; it simply illustrates a potential impact arising from the multidisciplinary design process, which is appropriately identified and capable of being addressed through refinement and mitigation. • In relation to Figure SK005 of the Outline CTMP [EN010158/APP/7.5.3], T87 are shown for removal at this location within the Tree Removal and Preliminary Protection Plan of the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. In relation to Figure SK006 of the Outline CTMP [EN010158/APP/7.5.3], the crossing point of Three Points Lane was moved further south to a gap in the trees to avoid the removal of trees with bat potential and associated impacts to these trees.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		from the outset, there is a risk for impacts to be overlooked or not addressed properly.	The Applicant confirms that Outline CTMP [EN010158/APP/7.5.3] has been updated to reflect the crossing point of Three Points Lane at Deadline 2. • In relation to Figure SK007 of the Outline CTMP, the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] highlights in the relevant tables and within the report body (section 5.2) that T534 (ash), a section of hedge H169 and T532 (Vet Oak) may be impacted by the junction construction. In relation to Claydon Rd South the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] shows T546, 545, G117 (cat A) and parts of hedges H179 and H180 as needing to be removed either as result of highway being on top of trees or for sightline requirements. • In relation to Figure SK008 of the Outline CTMP, the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] notes that tree T668, T717 and G174 could be impacted as temporary assessing bays are required. It notes: 'Some pruning possibly required and potential for RPA impacts if highways designed passing bay is to be installed'. • In relation to Figure SK009 of the Outline CTMP, the Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to reflect the hedgerow pruning requirement. • In relation to Figure SK010 of the Outline CTMP the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and plans show section of hedge H334 as being removed. • In relation to Figure SK011 of the Outline CTMP the Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to reflect the pruning requirement. The Applicant agrees that it is important that access and highway works are fully integrated into the arboricultural assessment from the outset to ensure impacts are appropriately identified and avoided where possible. As set out within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] impacts arising from access routes, highway works, and visibility requirements have been identified and assessed, including tree and hedgerow removals, pruning requirements, and potential RPA incursions. It is recognised that certain highway works are subject to fixed design parameters and safety requirements, which can limit flexibility. However, this does not indicate that impacts have been overlooked; rather, they have been clearly identified and transparently reported, with opportunities for further refinement at detailed design stage. The updates submitted at Deadline 2 will also address identified inconsistencies. Accordingly, ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has robustly and proportionately assessed the impacts of temporary highway measures on arboricultural features.
3.29	4.3.133 and 4.3.134	Comment stating that uncertainties that Council has identified in the Arboricultural Impact Assessment survey could risk the underestimation of indirect impacts from the Proposed Development. Further comment that indirect construction impacts may arise from repeated vehicle movements, the storage of materials and presence of construction plant material in proximity to arboricultural features.	As stated earlier in this table at 3.19, the Applicant does not agree that there are uncertainties in the arboricultural baseline or survey methodology that would lead to an underestimation of impacts. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is based on site-verified survey data undertaken in accordance with BS 5837:2012, and provides a robust basis for identifying both direct and indirect effects. Potential indirect impacts, including those arising from construction activities in proximity to retained features, have been appropriately considered within the assessment, including effects on RPAs, canopy disturbance, and diversion around RPAs where feasible.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			In relation to sensitive features such as veteran trees, Ancient Woodland edges, and hedgerows with mature boundary trees, the design incorporates precautionary buffer distances and avoidance measures, including 30 m offsets from Ancient Woodland set out within Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] . No veteran trees or Ancient Woodland are proposed for removal.
3.30	4.3.135 and 4.3.136	Comment that the decommissioning of the Proposed Development has the potential to involve works in proximity to retained trees, hedgerows and woodland edges and that limited information has been provided for as part of the DCO Application to date. Further comment that there is a lack of clarity in the decommissioning methodology with regard for arboricultural features.	As stated earlier in this table (Row 3.24), detailed decommissioning methodology is not defined at this stage. However, appropriate and proportionate mitigation measures to avoid damage to retained trees and hedgerows at decommissioning is detailed within the Outline DEMP [EN010158/APP/7.4.3] . Furthermore, impacts to trees and RPAs will be managed through a detailed Decommissioning Environmental Management Plan, which will be agreed with the relevant planning authority prior to the decommissioning phase (as secured by Requirement 18 of the Draft DCO [EN010158/APP/3.1.4]). This will ensure that any works within buffer areas or in proximity to retained arboricultural features are properly controlled, supervised, and mitigated.
3.31	4.3.147 and 4.3.148	Comment noting that a number of matters relevant to arboricultural protection are fundamental to the assessment of the impacts of the works themselves, rather than solely to construction management. Further comment that the approach to access routes, cabling, drainage features, highway works, temporary construction compounds and decommissioning activities directly influences whether impacts on trees, hedgerows and woodland can be avoided and whether proposed buffers can function as intended. Further comment that the reliance on the later-stage approval of a detailed CEMP does not provide sufficient certainty to inform the assessment of arboricultural effects.	The Applicant acknowledges that elements such as access routes, cabling, drainage, highway works, construction compounds and decommissioning activities are integral to the assessment of arboricultural effects. Throughout the design development process, trees, hedgerows and woodland features have been treated as key constraints, with the layout iteratively refined to avoid and minimise impacts wherever practicable. This includes the retention of the majority of arboricultural features, the application of buffers and stand-offs, and the avoidance of sensitive receptors such as veteran trees and Ancient Woodland. A reasonable worst-case scenario has been applied and assessed in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] to ensure that potential impacts are appropriately captured and that each of these elements is robustly considered. The role of subsequent detailed management plans (e.g. detailed Arboricultural Method Statement, detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan.) is not to defer assessment, but to secure the detailed implementation of mitigation and protection measures already identified. The further information provided in the detailed management plans will be agreed with the relevant planning authority prior to the relevant phase of works.
3.32	4.3.148 and 4.3.149	Comment requesting that an Outline Arboricultural Method Statement is developed to establish the principles under which relevant works would commence in arboriculturally sensitive locations. Further comment requesting that such an Outline Arboricultural Method Statement details how impacts on trees, hedgerows and woodland would be avoided or minimised. Further comment that an Outline Arboricultural Method Statement should provide clarity on the approach to access routes, temporary construction compounds and works associated with decommissioning, insofar as these are relevant to understanding arboricultural impacts.	An Arboricultural Method Statement (AMS) will be prepared following detailed design, prior to any construction works as set out and secured in Paragraph 1.1.13 and Table 3.2 of the Outline CEMP [EN010158/APP/7.2.3] and by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4] . At this stage, the preparation of an outline AMS would not add material value, as the final layout, construction methodologies, and working areas are not yet fixed. An outline document would therefore be necessarily high-level and largely reiterate the embedded mitigation measures already secured, without providing meaningful additional detail. The approach taken securing a detailed, site-specific AMS post-detailed design is standard practice and ensures that the final document is accurate, effective, and tailored to the confirmed construction parameters. The AMS will set out detailed measures to protect trees and will define how impacts on trees, hedgerows and woodland are to be avoided, minimised and managed during construction, including specific methodologies for access routes, temporary construction compounds and works in proximity to retained features. These would be substantially in accordance with the measures that are already set out within Table 3.2 of the Outline CEMP [EN010158/APP/7.2.3] and secured within the Design Commitments [EN010158/APP/5.9.4] . This includes

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			defined protective measures such as tree protection fencing, no-construction zones, controlled working methods, and appropriate timing of operations to safeguard retained trees and their Root Protection Areas. Where required, minor pruning or vegetation clearance will be undertaken in advance by a qualified arborist in accordance with BS 3998:2010, ensuring that works are proportionate and appropriately managed. All site personnel will receive site-specific inductions on tree protection, supported by strict procedures to prevent soil compaction, contamination, and accidental damage, including controls on storage, drainage, and spill management in proximity to retained trees.
3.33	4.3.150	Comment recognising that the development of an Outline Arboricultural Method Statement would not be expected to resolve all construction details in advance of consent, though it is considered necessary to demonstrate that the proposed mitigation strategy is capable of being delivered in practice and that arboricultural impacts have been adequately assessed at this stage.	Please see response above.
3.34	4.3.158 to 4.3.163	Comment that, for the reasons given in Section 4.3 of the LIR, the uncertainties identified in relation to survey accuracy, buffer adequacy, protection of veteran and future veteran trees, impacts arising from access and highway works, and the long-term management of retained arboricultural features and cumulative pressures mean that it has not yet been demonstrated that arboricultural impacts have been avoided or mitigated to a degree consistent with national policy expectations. Further comment that proposed mitigation does not fully align with VALP Policy NE8.	As stated earlier in this table at 3.19, the Applicant does not agree that there are uncertainties in the arboricultural baseline or survey methodology that would lead to an underestimation of impacts. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is based on site-verified survey data undertaken in accordance with BS 5837:2012, and provides a robust basis for identifying both direct and indirect effects. Potential indirect impacts, including those arising from construction activities in proximity to retained features, have been appropriately considered within the assessment, including effects on RPAs, with buffers applied in line with Natural England and Forestry Commission standing advice, canopy impacts, and diversion around RPAs where feasible. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the Applicant's compliant assessment and secured mitigation measures in relation to ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, 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 respect of that policy. Furthermore, the buffers applied to these features is in line with Natural England and Forestry Commission standing advice, canopy impacts, and diversion around RPAs, where feasible. Impacts arising from access and highway works have been identified, assessed and minimised through iterative design, with further refinements and clarifications provided at Deadline 2 to address any inconsistencies. Long-term protection and management of retained features are secured through the detailed Arboricultural Method Statement, detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan, ensuring appropriate control across all phases of the development. Accordingly, the Applicant considers that arboricultural impacts have been robustly assessed, avoided where practicable, and appropriately mitigated, and that the Proposed Development is consistent with national policy requirements.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
3.35	4.3.164	Comment recognising that certain detailed construction and management matters would be addressed through post-consent documentation. Further comment noting that a reliance on later-stage approval alone does not provide sufficient assurance that arboricultural mitigation will be delivered as intended. For mitigation to be effective, the principles underpinning buffer provision, protection of RPAs and management of works near trees must be clearly defined and secured from the outset of the Proposed Development.	ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies and evaluates impacts arising from construction, access and highway works, and operational phases, including tree and hedgerow removals, pruning requirements, and potential RPA incursions. The level of detail provided is proportionate to the current stage of design of the Proposed Development within the DCO process. At the detailed design stage of the Proposed Development, further refinement of layout and construction methodologies will be undertaken from which a detailed Arboricultural Method Statement will be submitted for approval by the relevant planning authority in consultation with the Environment Agency, as detailed and secured through the Outline CEMP [EN010158/APP/7.2] [APP-138] and by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4]. Further, as noted above, Design Commitment C7 in Design Commitments [EN010158/APP/5.9.4] secures that the principal components of the Proposed Development will avoid RPAs of trees as far as reasonably practicable. Where this is not possible, works will be undertaken under arboricultural supervision and 'no dig' construction methods will be used to protect the soil and minimise root impacts, as secured within the Outline CEMP [EN010158/APP/7.2.3]. Accordingly, the Applicant considers that mitigation measures that are appropriate and proportionate for this stage of the Proposed Development's design are suitably secured.
			Effects on Species and Habitats
3.36	4.3.1	Comment that the Proposed Development has the potential to cause significant harm to biodiversity and so Buckinghamshire Council considers the planning policy tests are not met and this means consent should not be granted.	Comment is noted; however, the Applicant respectfully disagrees based on the response provided for below and the responses provided throughout this table. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] considers, through Sections 9.16 (in isolation) and 9.26 (cumulatively), the Proposed Development's compliance with the relevant planning policies relating to biodiversity. These sections of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] conclude that the Proposed Development delivers substantial benefits, including benefits to biodiversity, that demonstrably outweigh the residual adverse in isolation and inter-project cumulative biodiversity effects.
3.37	4.3.2	Comment that previous concerns have been raised by Buckinghamshire Council regarding the Proposed Development's impact on Bechstein's bats Core Sustenance Zones, a loss of landscape connectivity and roost disturbance.	The Applicant is having ongoing discussions with stakeholders including Natural England and Buckinghamshire Council regards these issues and they included within the Statements of Common Ground (see Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] and Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2]) As detailed within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 12), the assessment in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has taken a precautionary approach with regards to the assessment of impacts on bat species, in particular Bechstein's bats, 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. The Applicant has undertaken a study of the potential for construction related noise and 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 study was submitted at Deadline 1 (see Bat Technical Study [EN010158/APP/8.5] [REP1-105]). The Applicant has already adequately considered impacts on roosts within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], Roosts in woodlands and within

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			hedgerow tree are protected with buffers secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.38	4.3.2	Comment that previous concerns have been raised by Buckinghamshire Council regarding the Proposed Development's impact on landscape connectivity and impacts on ground nesting birds.	ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has identified no significant residual adverse effects with regards to landscape connectivity or for ground nesting birds. The Applicant has outlined a suite of mitigation measures secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] to address impacts on landscape connectivity and other impacts related to ground nesting birds. A response has previously been provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 29) which provides further detail about how these mitigation measures are secured..
3.39	4.3.49	Comment that the area within which the Proposed Development is set is recognised locally as the 'Bernwood Biodiversity Opportunity Area' with the Local Nature Recovery Strategy and the local Biodiversity Action Plan setting out opportunities for nature's recovery here. Further comment that the area generally supports many species of wildlife which rely on the woodlands and associated habitats meaning that the Proposed Development will significantly change the natural landscape that is important to wildlife.	Firstly, all of the woodland habitat and the majority of hedgerows have been retained with significant buffers between habitat and the solar development. The Applicant considers that with these mitigation measures outlined in the Outline LEMP [EN010158/APP/7.6.3] the Proposed Development would not materially jeopardise the aims of the Bernwood Biodiversity Opportunity Area. In fact, habitats in the postconstruction scenario would meet a number of the Bernwood Biodiversity Opportunity Area aims; namely: • Proposed enhancement and creation of ponds within the Bernwood Biodiversity Opportunity Area • Proposed and enhanced hedgerows within the Bernwood Biodiversity Opportunity Area Habitat creation and enhancement as part of mitigation proposals outlined in the Outline LEMP [EN010158/APP/7.6.3] have been designed to support a wide range of species, including invertebrates, amphibians, reptiles, birds, bats, badgers, and otters. The habitat creation and enhancement proposals have also been carefully considered to ensure a connected ecological network linking the Site to the wider landscape is not only maintained but enhanced, ensuring the continued movement of wildlife across the landscape.
3.40	4.3.49	Comment that Buckinghamshire Council conclude significant adverse impacts on Bechstein's bats due to: a reduction in foraging resources, a reduction in landscape connectivity and disturbances to roosts.	As detailed within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 12) the assessment has taken a precautionary approach with regards to the assessment of impacts on bat species, in particular Bechstein's bats, 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. It is not the case that there will be a material reduction in foraging resources; given much of the land is currently arable and of lower value and that habitat enhancements to increase botanical diversity and hence invertebrate diversity and that more land will likely be allocated to grazing than currently is the case, nor is there likely to be a reduction in landscape connectivity as this has been prioritised as described above. In addition disturbances to roosts are unlikely (as set out in Bat Technical Study [EN010158/APP/8.5] [REP1-105] submitted at Deadline 1). The Applicant has undertaken a study of the potential for construction related noise and 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 study was submitted at Deadline 1 (see Bat Technical Study [EN010158/APP/8.5] [REP1-105]). The Applicant has already adequately considered impacts on roosts within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]. Roosts in woodlands and within hedgerow tree are protected with buffers secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4].

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3.41	4.3.49	Comment that Buckinghamshire Council conclude significant adverse impact on ecological connectivity within an important area for biodiversity.	ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has not identified any significant residual effects with regards ecological connectivity. The layout of the Proposed Development and embedded mitigation measures in the form of habitat creation and enhancement proposals secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] have been carefully considered to ensure a connected ecological network linking the Site to the wider landscape is not only maintained but enhanced, ensuring the continued movement of wildlife across the landscape.
3.42	4.3.49	Comment that Buckinghamshire Council conclude significant adverse impact on ground nesting birds.	Comment is noted ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has not identified any significant residual effects with regards ground nesting birds and has outlined a suite of mitigation measures secured within the Outline LEMP [EN010158/APP/7.6.3] (and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]) to address impacts on landscape connectivity and other impacts related to ground nesting birds. A response has previously been provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 29) which provides further detail about how these mitigation measures are secured.
3.43	4.3.51	Comment reiterating concern with the proposed impacts on Bechstein's bat through the installation of solar panels and associated infrastructure in Fields B6, B7, B8, B10, B11, D28 and D29 due to evidenced importance of these areas for foraging and commuting among the Finemere Wood maternity colony. Further comment noting Natural England's concern with the location of development in Fields B6 – B10 which are currently used for grazing cattle.	As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 21) the Applicant is not intending to remove Solar PV panels from these fields. In addition a detailed response regarding these fields has been given in Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-203] at page 209 to 214) outlining why the Applicant considers that in the context of the landscape scale mitigation proposed, the placing of solar in these fields is unlikely to cause a significant effect with regards to foraging bats and that overall there will be no net loss of cattle grazed 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. 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 panels to foraging and commuting bats and ensure the connectivity between these woodlands is maintained. As is detailed in Outline LEMP [EN010158/APP/7.6.3] removal of proposed Solar PV from a number of fields has been agreed following consultation. Where Solar PV has been removed from the Proposed Development, these areas would be used to provide semi-natural habitat for species and mitigation areas.
3.44	4.3.52	Comment that the high occurrence of PRF-M trees in the area between Sheephouse Wood and Shrubs Wood increases the value of this area for Bechstein's bats.	Comment noted that there are a large number of trees classified as PRF-M within Parcel 1 between Sheephouse Wood and Shrubs Wood. However, radio-tracking surveys undertaken as part of HS2 have not to date identified any Bechstein's bats roosts within these trees or any trees located within the Order Limits. The Applicant has undertaken a study of the potential for construction related noise and 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 study was submitted at Deadline 1 (see Bat Technical Study [EN010158/APP/8.5] [REP1-105]). The Applicant has already adequately considered impacts on roosts within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] . Roosts in woodlands and within hedgerow tree are protected with buffers secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.45	4.3.53	Comment in support of Natural England's Relevant Representation with regard for the removal of panels	The Applicant is not intending to remove Solar PV panels from these fields. The Applicant acknowledges Fields B6, B7 and B8 have a strategic location between Shrubs Wood, Decoypond Wood and Sheephouse Wood and

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		from Fields B6, B7 and B8 as this would avoid the loss of valuable habitat for Bechstein's bats.	are clearly within the home ranges of Bechstein's bats. However, the extent to which these pasture areas are of greater value than other pasture areas, based on the quality of the habitat as well as their location, is questionable, with a full detailed response provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-203] at page 209). Approximately 93ha of grassland would either be retained and enhanced 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/7.6.3] and ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060] It is proposed that mitigation areas be cattle grazed to ensure no net loss of cattle grazed grassland habitat, and enhancement measures will increase the botanical diversity to increase insect numbers so the importance of open foraging habitat is fully recognised. Setbacks from hedgerows specifically within these fields have been increased to 15m following consultation with Natural England and recognising that these hedgerows provide key routes for commuting and foraging bats, secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. 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 panels to foraging and commuting bats and ensure the connectivity between these woodlands is maintained.
3.46	4.3.53	Comment that recommends the Proposed Development removes all infrastructure from Fields B10 and B11 due to their proximity to Shrubs Wood and the potential deleterious effects on roosting and commuting behaviours.	The Applicant is not intending to remove Solar PV panels from these fields. Please see response in the above row.
3.47	4.3.54	Comment that retains concern with the location of solar panels in Fields D29 and D28 due to the importance of the habitat between Finemere SSSI and Runts Wood with a recommendation that these fields be removed. Further comment noting that Berks, Bucks and Oxford Wildlife Trust ("BBOWT") also support this recommendation.	The Applicant is not intending to remove Solar PV panels from these fields. 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 in part of Field D28 with an additional 5m from solar panels to the security fence. Additional woodland planting is proposed within these fields to strengthen the corridor between Finemere Wood and Runts Wood, along with all fields located to the north of Finemere Wood (Fields 30-37) being set aside for habitat creation and enhancement specifically for ecological mitigation predominantly for bats and ground nesting birds, secured within the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.48	4.3.63	Comment that Bechstein's bat is a woodland specialist with limited tendency to disperse, thereby leading to genetic isolation and inbreeding. Further comment that additional external pressures to the species may increase the risk of extinction, as reflected in Natural England's NECR558 Report.	The Applicant considers that potential effects on Bechstein's bat has been appropriately and robustly assessed in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]. Futher, as detailed within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 12) the assessment has taken a precautionary approach with regards to the assessment of impacts on bat species, in particular Bechstein's bats, 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.
3.49	4.3.85	Comment that Buckinghamshire Council considers that substantial weight should be given to the identified	The Applicant respectfully disagrees. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Section 10.2, that the residual adverse biodiversity effects on the Bechstein's bat set out in ES Volume

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		potentially significant impacts on the local Bechstein's bat population which is of national importance.	2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] 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 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 (2023). 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/6.2.3] (Paragraphs 7.10.132 and 7.10.133).
3.50	4.3.85	Comment that whilst significant harm has not been identified for other features of national importance (such as bat assemblage, black and brown hairstreak, adjacent woodland of national importance and hedgerows network connectivity), it is considered that impacts on these features should not be looked at in isolation but in terms of the local ecological network. Comment that this should weigh against the Proposed Development.	The Applicant is fully aware that the network of hedgerows and their connectivity is important for a number of ecological receptors not just bats but hairstreak butterflies as well and has not looked at this loss in isolation. As detailed within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 12) the Proposed Development has kept hedgerow loss to a minimum with the majority being reinstated and 4.17km of new hedge planting. In addition, retained hedgerows will have their management relaxed enabling additional maturity in blackthorn growth likely to support hairstreak butterflies. These measures and the network of buffers has ensured that woodland features are linked by hedgerow corridors with wide buffers to protect the habitat resource whilst also ensuring connectivity across the landscape is maintained.
3.51	4.3.86	Comment that the Proposed Development fails to avoid and mitigate effects on the local Bechstein's bat population meaning that the Proposed Development does not attract the Critical National Priority (CNP) presumption and that the ExA and Secretary of State should not apply the starting presumption that the Proposed Development is CNP infrastructure. Further comment that the Proposed Development's effects on the local ecological network are applicable here too.	The comment is noted but the Applicant disagrees with this interpretation of national policy. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises through Section 9.2 that, in assessing the Proposed Development against relevant national and local planning policy, the CNP policy applies in full as none of the exceptions under Paragraph 4.1.7 of NPS EN-1 (2023) are engaged.
Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other relevant Ecological Features			
3.52	4.3.1	Comment that Buckinghamshire Council has significant concerns regarding the ecological and arboricultural effects of the Proposed Development with regard for Sites of Special Scientific Interest (SSSI), Ancient Woodland and the Core Sustenance Zone (CSZ) for Bechstein's bats.	ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has not identified any significant residual effects with regards existing SSSI's and ancient woodland and in its Relevant Representation [RR-203] Natural England has confirmed this: <i>"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."</i>

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			The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] has identified a potential significant residual affect with regards foraging and commuting Bechstein's bats. But as stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38) the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4], all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites.. It is acknowledged that Parcel 1, 1a and 2 are within the Core Sustenance Zone defined by Natural England for Bechstein's bats. Parcel 1a is completely dedicated to biodiversity mitigation with no infrastructure proposed within this parcel. Within Parcel 1, habitat immediately north, east and west of both Decoypond Wood and Sheephouse Wood SSSI has been identified within Natural England Report NECR558³ 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 as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4].
3.53	4.3.2	Comment that further ecological surveys are still required to inform decision making and that further mitigation is required, with the removal of infrastructure from Fields B6, B7, B8, B10, B11, D29 and D28 and the general widening of the woodland and hedgerow buffers.	As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at pages 16-19 and 21), the Applicant considers that the survey effort is adequate to inform a complete and detailed assessment that fully considers impacts of the Proposed Development on the relevant ecological receptors and identifies appropriate mitigation as provided within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]. As stated earlier in this table, the Applicant is not intending to remove Solar PV modules from Fields B6, B7, B8, B10, B11, D29 and D28. The Applicant has set out its detailed justification for this position as part of its response to paragraphs 4.3.50 and 4.3.51 of the LIR. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38) the mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. In its Relevant Representation [RR-203] Natural England has confirmed this: <i>"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."</i>

³ Natural England (2024). The Bernwood population of Bechstein's Bats. A Non-Technical Summary (NECR558). Available online: <https://publications.naturalengland.org.uk/file/6128248514412544>

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			Therefore, Natural England are in agreement that the proposed 30m buffer from ancient woodland in combination with the mitigation measures proposed within the Outline CEMP [EN010158/APP/7.2.3] is sufficient to protect ancient woodland. The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] secured via the Outline LEMP [EN010158/APP/7.6.3] already commits to a minimum, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence. Measurements from hedgerow centrelines are the most consistent and accurate way to measure and implement on Site and maintains the intended ecological buffer and prevents the hedgerow itself from reducing the usable buffer width. The Applicant considers that these buffers are proportionate and appropriate.
3.54	4.3.50	Comment that both Buckinghamshire Council and Natural England have continued concerns with the location of solar panels and associated infrastructure between Sheephouse Wood SSSI and Shrubs Wood.	The Applicant is fully aware that fields located between Sheephouse Wood SSSI and Shrubs Wood form important areas of the Bechstein's bat core sustenance zone. However, the extent to which these pasture areas are of greater value than other pasture areas located within the Order Limits, as the majority of pasture within the order limits and the immediate local environment appears intensively managed, is questionable, as with a full detailed response provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-203] at page 209). 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 recognition that these hedgerows provide key routes for commuting and foraging bats, with 30m offsets from Shrubs Wood, Sheephouse Wood and Decoypond Wood proposed. 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 panels to foraging and commuting bats and ensure the connectivity between these woodlands is maintained, secured via the Outline LEMP [EN010158/APP/7.6.3] and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4].
3.55	4.3.65	Comment noting the proposed designation of the Bernwood SSSI which highlights the geographic scale of importance of the local area for woodlands, bats, and black hairstreak butterfly.	The detailed assessment in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] fully acknowledges the importance of the bat assemblage, woodlands and black hairstreak butterfly and 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 confirmed that: <i>"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."</i> This is set out and agreed within the Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Ancient Woodland, Veteran Trees and Hedgerows			
3.56	4.3.2, 4.3.87, 4.3.88 and 4.3.89	Comment that buffers to Ancient Woodland should be at least 50m from the woodland edge and that other woodlands should benefit from a minimum 25m buffer and hedgerows should benefit from a minimum 10m buffer from their edge. Further comment that the proposed 30m buffer to ancient woodland contravenes VALP Policy NE8 which mandates a 50m buffer. Comment that the Proposed Development contravenes the objectives of VALP Policy NE1, specifically part h.	As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] (and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]) includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. These buffers were considered in the assessment of the Proposed Development on SSSIs (including the SSSIs which comprise ancient woodland). In its Relevant Representation [RR-203] Natural England has confirmed this: <i>"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."</i> Therefore, Natural England are in agreement that the proposed 30m buffer from ancient woodland in combination with the mitigation measures proposed within the Outline CEMP [EN010158/APP/7.2.3] is sufficient to protect ancient woodland. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the irreplaceable nature of ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, 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 respect of that policy. Appendix 4 (Policy Compliance Assessment Tables) of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] provides an assessment of the Proposed Development against the objectives established under VALP Policy NE1 and concludes that the Proposed Development is compliant with the objectives of this policy. ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] already commits to a minimum 20m buffer from other woodland, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence. These measures are secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. Measurements from hedgerow centrelines are the most consistent and accurate way to measure and implement on Site and maintains the intended ecological buffer and prevents the hedgerow itself from reducing the usable buffer width.
3.57	4.3.49	Comment that the Proposed Development is set within an area of high ecological value due to the numerous ancient woodlands which form a woody landscape that includes species rich hedgerows, grassland, and watercourses.	The Applicant is fully aware of the sensitivity of the location of the Proposed Development. The layout of the Proposed Development and embedded design principles have been deliberately designed to ensure the retention and protection of habitats that are considered to be of higher value to biodiversity including ancient woodland, ponds, watercourses, ditches and the majority of hedgerows and arable field margins, with loss of hedgerows and individual trees kept to a minimum with re-instatement of hedgerows undertaken in the majority of cases. The vast majority of infrastructure 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

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			infrastructure located to avoid more ecologically sensitive areas. Mitigation planting includes the creation and enhancement of extensive areas of grassland, hedgerows, arable margins, ponds and scrub and tree planting that has been designed to create a coherent ecological network to link the Site to the wider landscape, ensuring the Site will continue to support a range of species of principal importance for conservation, which is detailed and secured by Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.58	4.3.66	Comment stating that the direct impacts of the construction phase of the Proposed Development will involve the removal of 2,060m of hedgerow at over 82 locations as well as mature trees. Of the hedgerow loss, up to 1,310m is anticipated to be permanent though Buckinghamshire Council considers that the removal of any well-established hedgerow should constitute permanent loss since reestablishing this habitat would take decades.	It is acknowledged that new hedgerow planting would take some time to fully establish (10 years) but this certainly does not equate to permanent loss of the relevant hedgerow nor would hedgerow establishment take decades. The Applicant recognises the historical and ecological significance of the hedgerow network as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] . Gaps would be kept to a minimum and where possible gaps would be reinstated in a similar alignment and similar suite of species to that being lost, with 4.17km of new and reinstated hedge planting proposed, detailed within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and within the Outline LEMP [EN010158/APP/7.6.3] The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and Outline CEMP [EN010158/APP/7.2.3] outline measures to ensure maintenance of the linear nature of any gaps until the reinstated hedgerows have had time to establish sufficiently. The predicted hedgerow loss is a reasonable worst-case scenario and may not be as extensive as currently indicated when the detailed design of Interconnecting Cable Corridor(s) and the Grid Connection Cable Corridor is finalised. Design commitments C7 and D1 within Design Commitments [EN010158/APP/5.9.4] are intended to minimise hedgerow losses.
3.59	4.3.67 and 4.3.143	Comment that the proposed buffers to existing hedgerows and woodlands are not sufficiently wide to protect bat roosting, foraging or commuting habitats. Further comment that the buffers from hedgerows ought to be measured from a hedgerow's edge since wider hedgerows will have diminished buffers. Wider comment that wooded corridors that are important to bats should have their buffers increased further on a precautionary basis.	As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] page 12 and page 24) 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 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 has been presented within the Statement of Common Ground with Natural England (submitted at Deadline 1). Finally a detailed monitoring strategy is outlined within the Outline LEMP [EN010158/APP/7.6.3] 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.
3.60	4.3.96	Comment that 48 hedgerows within the Order Limits are 'important' under the Hedgerows Regulations 1997 and that any loss or degradation of these would weaken tree cover and the historic landscape framework and connectivity across the Site.	The Applicant recognises the historical and ecological significance of the hedgerow network as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and within Appendix 3 - Vegetation Removal Parameters of the Outline LEMP [EN010158/APP/7.6.3] Gaps would be kept to a minimum and where possible gaps would be reinstated in a similar alignment and similar suite of species to that being lost, with 4.17km of new and reinstated hedge planting proposed, including hedgerows that will be planted and enhanced ahead of construction works commencing as detailed within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and the Outline LEMP [EN010158/APP/7.6.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .

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3.61	4.3.107	Comment that Buckinghamshire Council consider that the Proposed Development has the potential to give rise to direct, indirect and long-term arboricultural impacts affecting trees, hedgerows, woodland edges, and veteran trees within and adjacent to the Order Limits. These impacts may arise during construction, persist during the operation (including maintenance), and potentially occur again at the decommissioning phase.	The Applicant acknowledges that the Proposed Development has the potential to give rise to direct, indirect and long-term arboricultural impacts and considers that these potential impacts have been appropriately identified and assessed in line with the current stage of design and addressed within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] . It concludes that, with the application of embedded mitigation and secured management measures, these impacts will not result in likely significant effects on relevant arboricultural features. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 43), trees within the Order Limits already form part of actively managed agricultural boundaries. As such, post-development pressures are not anticipated to materially change, and ongoing management, including sensitive pruning, can continue to be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations. Where impacts remain, these are clearly defined and limited in extent and are capable of being effectively mitigated through embedded design measures (e.g. buffers and stand-offs) and secured controls, including the Arboricultural Method Statement (AMS), Outline LEMP [EN010158/APP/7.6.3] and Outline DEMP [EN010158/APP/7.4.3] .
3.62	4.3.108	Comment that the significance of the impacts of vegetation removal is not limited to the number of features removed but also includes the impacts of ecological and landscape fragmentation, with particular regard for important hedgerows. Further comment that replacement planting would take time to establish to be of a like value to that removed.	The Applicant acknowledges that the Proposed Development will give rise to some direct arboricultural impacts, including the removal of limited sections of hedgerows, groups, and individual trees to facilitate the Proposed Development as set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The extent of removal is limited in scale and predominantly relates to sectional hedgerow removal to enable access between fields, with limited individual trees, one group and small sections of groups affected, and no veteran trees or Ancient Semi-Natural Woodland proposed for removal. The majority of linear features will therefore be retained, preserving the overall arboricultural landscape character. As detailed above, the Applicant recognises the historical and ecological significance of the hedgerow network as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], with loss of important hedgerow kept to a minimum. Replacement hedgerow planting and new hedgerow panting is proposed so that overall, there will be an increase in hedgerows across the Order Limits than is currently present within the baseline. The habitat creation and enhancement proposals have also been carefully considered to ensure a connected ecological network linking the Site to the wider landscape is not only maintained but enhanced, ensuring the continued movement of wildlife across the landscape. These proposals are detailed within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and the Outline LEMP [EN010158/APP/7.6.3] and secured by the Outline LEMP and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. 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 ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and Outline CEMP [EN010158/APP/7.2.3] outline measures to ensure maintenance of the linear nature of any gaps until the reinstated hedgerows have had time to establish sufficiently. These measures are secured by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].
3.63	4.3.110	Comment that over the operation (including maintenance) phase of the Proposed Development, future tree growth and crown expansion has the potential to conflict with infrastructure and operational requirements, meaning that there is a risk of incremental tree management (through pruning)	The embedded mitigation detailed in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] includes a minimum 30m offset from all ancient woodland and 20m from other areas of woodland with an additional 5m from solar panels to the security fence. These offsets ensure that retained trees and woodland are not placed under undue pressure from operational requirements, and that future growth and crown expansion can be accommodated without conflict with infrastructure. Operational management will therefore be largely limited to existing hedgerows and access routes. As stated earlier in the table (see response to paragraph 4.3.107 of the LIR), post-development pressures are not anticipated to materially change, and

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		resulting in the erosion of natural arboricultural value across the Site.	ongoing management, including sensitive pruning, can continue to be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations. The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase. These documents have been updated to state: “A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified”.
3.64	4.3.113	Comment recognising that a number of veteran and ancient trees are located in proximity to the Proposed Development and so there remains potential for there to be indirect impacts on these trees during the construction phase.	The presence of veteran trees in proximity to the Proposed Development is acknowledged, and their high sensitivity to both direct and indirect impacts is recognised. Design Commitment C7 within Design Commitments [EN010158/APP/5.9.4] states that the principal components of the Proposed Development will avoid RPAs of trees and hedgerows as far as reasonably practicable, except where hedgerow crossings are required for access tracks and/or cable routes. In addition, potential indirect impacts on veteran trees during construction (including changes in soil conditions, compaction and hydrology) will be appropriately managed through the implementation of an Arboricultural Method Statement (AMS). The AMS will set out specific protection measures, working methods, and where necessary, enhanced buffers and supervision requirements for retained veteran trees, secured through the Outline CEMP [EN010158/APP/7.2.3] and Requirement 11 of the Draft DCO [EN010158/APP/3.1.4] .
3.65	4.3.114 and 4.3.115	Comment noting that a proportion of retained trees are located within hedgerows or along woodland edges in proximity to the Proposed Development's operation (including maintenance) phase infrastructure. Further comment noting that veteran trees or trees with potential to develop veteran characteristic need to be clearly identified, appropriately buffered and positively managed as there is a risk that routine maintenance may progressively reduce a tree's canopy, disturb roots or result in its decline.	The Applicant considers that relevant retained trees, including veteran trees or trees with potential veteran features, are sufficiently identified and buffered and will be appropriately managed as part of the Proposed Development. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] , veteran trees have been clearly identified and afforded additional protection, including the application of precautionary buffer zones exceeding standard RPAs, informed by relevant guidance. As stated earlier in the table (see response to paragraph 4.3.110 of the LIR) the Proposed Development incorporates significant stand-off distances from infrastructure. Relevant operational activities, including vegetation management, will be controlled and proportionate, largely reflecting existing practices. Any necessary tree works will be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations, ensuring that pruning is appropriate and does not lead to long-term degradation. Accordingly, the risk of progressive canopy reduction, root disturbance, or decline is considered low and appropriately mitigated through design, buffers, and management measures secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .
3.66	4.3.116	Comment that the Applicant's assessments do not sufficiently integrate the long-term growth characteristic of retained trees over the operation (including maintenance) phase of the Proposed Development. Further comment raising concern with confidence that the operational management and maintenance activities have been adequately identified, assessed, or mitigated for from the outset.	The Applicant does not agree that long-term growth characteristics of retained trees have not been integrated as part of the relevant assessment. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] , the design has been informed by precautionary buffer distances, RPAs, and additional stand-offs for veteran and high-value trees, which inherently account for future growth, rooting requirements, and long-term retention. The Proposed Development incorporates substantial offsets from woodland edges, Ancient Woodland, and hedgerows, ensuring that retained trees have sufficient space to accommodate crown expansion and root development over the operational period, without conflict with infrastructure.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase. These documents have been updated to state: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified". Accordingly, the Applicant is confident that operational management and maintenance activities have been adequately identified, assessed, and mitigated where required.
3.67	4.3.117 and 4.3.118	Comment noting the location of a group of trees with potential to be native black poplar within the hedgerow between Fields D12 and D13. Further comment recognising the Applicant's view that this group of trees is to remain unaffected by the Proposed Development but that Buckinghamshire Council considers otherwise due to uncertainty in survey methodology and the flexibility inherent in the outline layout. Further comment that clarity on species identification, buffer provision, protection measures, and long-term management is considered necessary to ensure that potential impacts are adequately addressed.	The Applicant confirms that the group of trees (G98) identified as potentially comprising native black poplar is not affected by the Proposed Development, as set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The group is located outside of areas required for infrastructure, access, or construction activity, and will be retained and protected in full. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 44), definitive identification of native black poplar (<i>Populus nigra</i> subsp. <i>betulifolia</i>) requires DNA testing and specialist laboratory analysis, which falls outside the scope of a standard BS 5837:2012 arboricultural survey. Notwithstanding this, the assessment has adopted a precautionary approach, treating the group as a feature of elevated value. Accordingly, the Applicant considers that sufficient clarity has been provided in respect of species consideration, protection, and management and that any potential impacts on the species have been accurately and robustly assessed.
3.68	4.3.128 and 4.3.129	Comment that, on review of the Outline Drainage Strategy, a number of proposed attenuation features are shown in proximity to or within areas identified as buffers to woodland which is of concern to Buckinghamshire Council. Further comment noting examples to the west of Field B3, south-west of Field B7 and to the south of Field B18. Further comment recognising the indicative nature of the drainage strategy.	The Applicant acknowledges that some proposed attenuation features are near or within woodland buffer areas; these have been strategically proposed in those indicative locations based on the local topography, to ensure that surface water management can mimic the existing flowpaths on site and by gravity, in accordance with the principles of sustainable drainage. Any other locations for these attenuation features on those three plots would require mechanical drainage systems including electrical pumps; this would require increased inspections and maintenance frequency. To promote the use of these SuDs by gravity, it is proposed to maintain the attenuation features in their current indicative locations. The ponds are designed to manage surface water runoff from the Solar PV development, ensuring runoff into the woodland does not exceed the pre-development green field rates. These attenuation features are considered to be compatible in nature and operation to the support the existing woodlands as they are designed to enhance the biodiversity and amenity value of the Proposed Development. Further details are provided in Outline Drainage Strategy [EN010158/APP/7.11.3].
3.69	4.3.130	Comment noting that the introduction of attenuation features typically involves ground excavations and changes to ground levels. Therefore, the introduction of such features in woodland buffers conflicts with retaining them as undisturbed transition zones, free from excavation and construction activity.	As outlined in the Outline LEMP [EN010158/APP/7.6.3] all buffer zones will require some ad hoc management over the life of the solar farm to maintain a mosaic of scrub and grassland habitat, but this will be very light touch on an infrequent basis likely occurring during the winter months when sensitive species are dormant. Attenuation features will likely involve an element of short-term temporary disturbance at the construction phase, but features will be carefully placed to avoid impacts to root protection zones and as such do not undermine the long-term objective of maintaining root protection zones as undisturbed transition zones. It is also considered that

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			temporary water within attenuation basins and development of damp grassland may attract invertebrates of value to foraging bat species. In particular, the construction works of such attenuation systems will also work with the local sloping topography and include a mixture of excavations and land raising to create the optimum attenuation capacity, hence minimising the extent of excavations where possible. Details about how the attenuation features will be provided and maintained without harming trees will be provided within the Arboriculture Method statement and cross referenced in the Drainage Strategy at the detailed design stage.
3.70	4.3.131	Comment noting that the proposed location of attenuation features within woodland buffers risks the erosion of buffer integrity over time and further illustrates the limitations of relying on generic buffer distances. Further comment that this reinforces the need for consistency with VALP Policy NE8.	The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the irreplaceable nature of ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, 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 respect of that policy. The introduction of the SuDS features in these locations are strategic for surface water management across the Proposed Development and also to ensure no impact on the ancient woodland is posed by increased runoff from site. These attenuation features are considered to be compatible in nature and operation to the existing woodlands as they are designed to enhance the local biodiversity and amenity value of the Proposed Development, in supporting the adjacent woodland areas. The construction works of such attenuation systems will also work with the local sloping topography and include a mixture of excavations and land raising to create the optimum attenuation capacity, hence minimising the extent of excavations where possible.
3.71	4.3.132	Comment on there being a substantial proportion of retained trees, hedgerows and woodland edges that would be located in proximity to construction activities over a prolonged period. Further comment on the kinds of indirect impacts that may arise, such as soil compaction, rooting disturbance, changes to hydrology and changes to soil structure.	The Applicant acknowledges that a proportion of retained trees, hedgerows and woodland edges are located in proximity to construction activities, however, ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies these relationships and sets out appropriate measures to avoid and control indirect impacts. Potential effects such as soil compaction, root disturbance, changes in hydrology, and alteration of soil structure are well understood and have been addressed through mitigation, including: • Establishment RPAs and no-construction zones; • Installation of protective fencing to prevent encroachment; • Use of low-impact construction techniques where works are required in proximity to retained features; and • Implementation of good site practice controls. Which is secured through the Outline CEMP [EN010158/APP/7.2.3] the AMS and Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].
3.72	4.3.138	Comment reflecting Buckinghamshire Council's uncertainty as to whether the secured mitigation and management measures are sufficiently defined,	All mitigation measures specified in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] related to the protection of arboricultural assets are sufficiently defined and considered proportionate to the potential impacts

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		proportionate and robustly secured for the protection of arboricultural assets.	that could occur and are secured in Works Plans [EN010158/APP/2.3.3] [REP1-005] , Design Commitments [EN010158/APP/5.9.4] , Outline CEMP [EN010158/APP/7.2.3] as well as the Arboriculture Method Statement, Outline LEMP [EN010158/APP/7.6.3] and the Outline OEMP [EN010158/APP/7.3.3] . The Works Place, the Design Commitments and the management plans are secured by the relevant requirements in the draft DCO.
3.73	4.3.139	Comment that VALP Policy NE8 places strong emphasis on the protection of important trees, hedgerows, and woodland, including the provision of buffers that allow sufficient space for long-term protection, growth, and management. Further comment that the strategy within the Arboricultural Impact Assessment is generic in nature and not demonstrably tailored to the value, sensitivity or long-term requirements of the features it is intended to protect.	As stated within the Planning Statement [EN010158/APP/5.7.3] [REP1-016], 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 15metres 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. The Applicant does not agree that the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] strategy is generic or not tailored to the value and sensitivity of arboricultural features. As set out within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], buffer distances and stand-offs have been informed by site-specific survey data, including individual tree constraints (e.g. Root Protection Areas, canopy spreads, and condition), and the identification of higher value features such as veteran trees and Ancient Woodland. These features are afforded enhanced, precautionary buffers, consistent with relevant standing advice and best practice. Accordingly, the Applicant considers that the strategy is proportionate, feature-specific, and aligned with current best practice, providing sufficient space for the long-term protection, growth and management of trees, hedgerows and woodland.
3.74	4.3.140	Comment that the Arboricultural Impact Assessment's proposed buffer distances to Ancient Woodland, hedgerows and veteran and mature trees (with particular regard for Ancient Woodlands) fall short of local policy expectation.	This has been addressed within the Applicant's responses to points 3.76 and 3.69 above. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] captures the Applicant's knowledge of the irreplaceable nature of ancient woodland, ancient trees, veteran trees and other irreplaceable habitats, as detailed within Paragraphs 5.4.14 and 5.4.15 of NPS EN-1 (2023). Resultingly, Design Commitment C7 in Design Commitments [EN010158/APP/5.9.4] secures that the principal components of the Proposed Development will avoid RPAs of trees as far as reasonably practicable. Where this is not possible, works will be undertaken under arboricultural supervision and 'no dig' construction methods will be used to protect the soil and minimise root impacts, as secured within the Outline CEMP [EN010158/APP/7.2.3] and Requirement 11 of the Draft DCO [EN010158/APP/3.1.4] .
3.75	4.3.141	Comment that the Arboricultural Impact Assessment refers to a " <i>minimum 10m offset from the fence line to existing hedgerows</i> ", which is ambiguous as to whether this distance applies to each side of the hedgerow or as a total width. Further comment that VALP Policy NE8 is clear that a minimum of 10m should be provided on each side of retained hedgerows within the Order Limits. Overarching comment that an absence of	The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] already commits to a minimum, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence, with the measurement being offset either side from centre line of hedgerows within the Order Limits. These measures are secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] . Measurements from hedgerow centrelines are the most consistent and accurate way to measure and implement on Site and maintains the intended ecological buffer and prevents the hedgerow itself from reducing the usable buffer width.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		clarity risks the Proposed Development being in conflict with arboriculture.	
3.76	4.3.142	Comment that the proposed hedgerow buffers do not adequately reflect the presence of mature boundary trees within many hedgerows, nor do they account for future crown spread and rooting requirements over the lifetime of the Proposed Development. Further comment that there is no consistent application of enhanced buffers specific to veteran or potentially veteran trees, despite their sensitivity and long-term value.	The Applicant does not agree that hedgerow buffers fail to account for mature boundary trees or future growth requirements. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] , mature trees within hedgerows have been individually surveyed and assessed, rather than treated solely as hedgerow features. Their RPAs, canopy spreads, and retention categories have been defined and have informed the design and layout. As previously stated throughout the table specific set back distances have been applied. In relation to veteran and potential veteran trees, the assessment confirms that these features have been clearly identified and afforded enhanced protection, including the application of additional buffers beyond standard RPAs in line with relevant guidance, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance makes clear that <i>"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."</i> Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.
3.77	4.3.144	Comment that Buckinghamshire Council does not consider that the proposed buffer strategy within the Arboricultural Impact Assessment demonstrates a proportionate and feature-specific strategy for the safeguarding of trees, hedgerows, and woodland over the long term. Further comment that the strategy does not comply with VALP Policy NE8.	This has been addressed within the Applicant's responses to points 3.76 and 3.69 above. The Applicant does not agree that the buffer strategy is disproportionate or non-specific. The approach to buffers within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is feature-specific and informed by site survey data, including the application of RPAs, canopy spreads, and additional precautionary offsets where required. As stated within the Planning Statement [EN010158/APP/5.7.3] [REP1-016] whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodland, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in respect of that policy. Furthermore, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance makes clear that <i>"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."</i> Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.
3.78	4.3.145	Comment requesting greater clarity within the Outline LEMP regarding the long-term management of woodland edge conditions, hedgerows and retained trees, and how conflicts arising from tree growth over time will be avoided.	The approach to management of hedgerows and hedgerow trees to avoid conflict between tree growth and panel shading over time is set out on page 43 in response to [RR-026] within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]. The Outline LEMP [EN010158/APP/7.6.3] was updated at Deadline 1 to provide further clarity on this. This reiterates the buffers that will be applied from hedgerows, trees, and woodland, which are secured in the Outline LEMP [EN010158/APP/7.6.3], Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] and the Design Commitments [EN010158/APP/5.9.4]. Any localised shading that may occur can be managed through sensitive pruning in line with BS 3998:2010 Tree work – Recommendations, rather than creating an unavoidable need for significant tree reduction or felling. The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] has been updated at Deadline 2 to include text that states: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified”.
3.79	4.3.151 and 4.3.152	Comment that the cumulative effects of direct arboricultural losses, indirect construction impacts and long-term operational pressures have the potential to result in a gradual erosion of arboricultural value across the Site. Further comment recognising the combination of these effects may be significant, particularly with regard for other large-scale infrastructure projects locally. Comment is provided with an example of cumulative pressures at Decoypond Wood.	The Applicant does not agree that the cumulative effect of impacts from the Proposed Development and other relevant developments would result in a gradual erosion of arboricultural value across the Site. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], direct losses are limited in extent and clearly defined, with the majority of hedgerows, trees and woodland features retained, and no loss of veteran trees or Ancient Woodland. Potential indirect and operational effects have been identified and addressed throughout this table.
3.80	4.3.153 and 4.3.154	Comment that the Order Limits overlap with the HS2 Act Limits and that the Proposed Development proposes panels within areas that are to be or have been planted as woodland by HS2, reducing the buffer that was secured adjacent to Decoypond Wood Ancient Woodland and also reducing the commuting route for bats provided within this key area. Further comments stating that the proposed panel layout has the potential to adversely affect both ancient woodland integrity and the functionality of the ecological network carefully planned as part of HS2.	The Applicant is aware that some parcels of the land within the Order Limits are covered by The Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we plan to submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.3].
3.81	4.3.155	Comment noting that buffers to safeguard Ancient Woodland should not also be used to compensate for impacts arising from infrastructure projects. Further comment on the point that buffer zones should operate as relatively undisturbed transition zones and that expecting such buffers to perform additional mitigation roles undermines the buffer function.	The Applicant is not aware of any policy limitation with using buffers to implement more than one element of mitigation, nothing proposed within the buffers is likely to directly impact soil or the root protection zone of trees (see row 3.67 and 3.68 regards safeguards from siting attenuation features). The width of the proposed buffers from woodland features and the proposed long-term management being a mosaic of scrub and rough grassland are designed to act as relatively undisturbed transition zones between the Proposed Development and woodland habitat whilst also ensuring connectivity with the wider landscape and allowing continued use of the landscape by foraging bats and other species. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
3.82	4.3.156	Comment that the Proposed Development includes modest diversions to Footpaths SCL/13/1 and SCL/13/2 in the vicinity of Decoypond Wood but that doing so introduces additional activity and movement along a sensitive woodland edge that is already subject to cumulative pressures arising from HS2 works and the Proposed Development itself.	The diverted route now follows the edge of Decoypond Wood for approximately 158m, whilst exiting Field B7 at the corner of the wood as it does at present. Buckinghamshire Council's Rights of Way team have indicated their preference for PRoW diversions to follow the edge of fields to aid wayfinding for PRoW users. Discussions at consultation events and feedback received from Phase One and Phase Two Consultation have suggested that PRoW within Parcel 1 are less frequently used than PRoW directly accessible from Botolph Claydon in Parcel 2, as reflected to some extent in the summary responses considered in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029] . The Applicant does not consider that there would be large enough numbers of walkers using the route to create disturbance to the woodland. In addition, additional recreational routes would be created within the Site, potentially spreading recreational disturbance away from Decoypond Wood. The diversions are described in ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034] and the Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.3] , and secured by the Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006] .
3.83	4.3.157	Comment summarising the need for more generous buffers around Ancient Woodlands for the above mentioned factors. Further comment reiterating that enlarged buffers would reinforce their function and the capacity in accommodating cumulative pressures, without being compromised by overlapping mitigation demands or additional land-use pressures, in order to safeguard the long-term integrity and resilience of woodland assets.	As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] , Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] and Design Commitments [EN010158/APP/5.9.4] includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. In addition, the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] secured via Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] already commits to a minimum, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence, with the measurement being offset either side from centre line of hedgerows within the Order Limits. The Applicant considers the mitigation proposed will be effective in offsetting the impacts identified.
3.84	4.3.158	Comment on review of the proposed mitigation, together with the uncertainties identified in relation to survey accuracy, buffer adequacy, access, and highway works, long-term management and cumulative pressures, mean that residual adverse effects on trees, hedgerows and woodland cannot be ruled out.	As stated throughout this table (3.19, 4.3.94, 4.3.111 and 4.3.137), the Applicant considers that the survey effort for arboricultural receptors is sufficient and accurate to inform the robust assessment presented and the proposed mitigation to offset potential impacts regards survey accuracy, access and highways works are considered appropriate and proportionate, as detailed within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] . Buffer adequacy is dealt with in 4.3.157 above. As outlined above and throughout this table, the Applicant considers that the survey effort for ecological receptors is sufficient and accurate to inform the robust assessment presented and the proposed mitigation to offset potential impacts are considered appropriate and proportionate, detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] .
3.85	4.3.159	Comment that there remains uncertainty as to whether the proposed buffers and management measures are sufficient to safeguard Ancient Woodland edge conditions, veteran and future veteran trees, and	As stated throughout this table (3.19, 4.3.94, 4.3.111 and 4.3.137), the Applicant does not agree that there remains uncertainty regarding the effectiveness of the proposed buffers and management measures. The full assessment is presented in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] demonstrates that precautionary, feature-specific buffers have been applied, including up

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
3.86		important hedgerows over the lifetime of the Proposed Development.	to 30m offsets from Ancient Woodland, additional stand-offs from woodland edges and hedgerows, and enhanced protection for veteran trees.
	4.3.160	Comment that there is a risk of incremental and cumulative impacts (across all phases of the Proposed Development) leading to a gradual erosion of arboricultural value that would be difficult to reverse.	As set out throughout this table, the Applicant does not agree that there is a risk of incremental or cumulative impacts leading to a gradual erosion of arboricultural value. The ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies impacts across all phases and demonstrates that these are limited, clearly defined, and appropriately mitigated through embedded design, including retention of the majority of hedgerows, trees and woodland features and no loss of veteran trees or Ancient Woodland and the application of buffers. All phases of the development are subject to secured management and protection measures, ensuring that retained trees, hedgerows and woodland are protected and sustainably managed over the long term (see the Applicant's response to paragraph 4.3.138 of the LIR). In addition, over 8ha of new woodland planting is proposed.
	Biodiversity Net Gain Assessment and how Biodiversity Net Gain would be Secured		
3.87	4.3.77	Comment that the positive biodiversity net gain (BNG) figure achieved by the Applicant is due to the changing of large areas of arable land into grassland and that the metric is too simplistic to consider the landscape scale impacts that solar panels and associated infrastructure will have. Further comment that the BNG figure does not account for the importance of locality or presence of protected species.	Landscape scale impacts are mitigated through measures in the Outline LEMP [EN010158/APP/7.6.3] and the BNG assessment take account of all the landscape and ecological mitigation and enhancements proposed. The Applicant confirms that, as is standard, the BNG metric is habitat based. The Applicant notes, however, that the habitat creation and enhancement measures proposed (that give rise to a portion of the increase in biodiversity units proposed) does take species effects into account as outlined below in response to paragraph 4.3.78 of the LIR.
3.88	4.3.78	Comment that the BNG figure achieved should attract limited weight as a result of the positive change in biodiversity value as this figure should be taken in the context of the overall ecological effect of the Proposed Development.	The Applicant wholly disagrees with Buckinghamshire Council's position on the BNG achieved by the Proposed Development within this comment. It should be recognised that the enhancement of biodiversity in terms of Biodiversity Units is more than just numbers in a spreadsheet. Some baseline habitats including arable farmland and modified grassland are currently intensively managed for agricultural purposes and as such do not deliver significant biodiversity benefit, which will change to less intensive management with a cessation of herbicide and fertilizer input improving biodiversity over time. In addition, the habitat creation and enhancement measures proposed as part of the Proposed Development have ensured retention of the most valuable habitat features whilst being designed to mitigate for the effects on species assemblages (notably bats and birds) aiming to reduce fragmentation and ensure continued connectivity with the wider landscape. The Draft DCO [EN010158/APP/3.1.4] secures, via Requirement 7, a BNG that is significantly in excess of the soon to be mandatory 10% BNG and equates to a secured minimum net gain of 40% for habitats area units, 17% for hedgerow units, and 10% for watercourse units. Furthermore, it should be noted that BNG is not yet mandatory for NSIP-scale projects and so the BNG voluntarily secured for the Proposed Development should be received positively and attract significant weight, particularly where the uplift is as great as it is in the Proposed Development's case. The BNG assessment is set out in ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].

Table 3-4: Cultural Heritage

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Cultural Heritage, including Designated and Non-Designated Heritage Assets			
4.1	4.5.2	Comment stating that harm would arise from solar farm infrastructure across agricultural fields to the south of Orchard Way within former estate land associated with Claydon House. Comment noting some visibility of solar panels from views at the principal elevation and associated terrace of Claydon House, particularly from the first-floor rooms with regard for views to Knowl Hill. Further comment that, whilst not obstructing this view, the Proposed Development would introduce energy infrastructure into this view, characterised by uniform, linear arrays contrasting with the existing agricultural fieldscapes, which have formed the foreground in views of Claydon House and Park since the 18th century.	As noted within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] views from the principal (west facing) elevation of Claydon House and terrace will have oblique views of the solar arrays and collector compound within Parcel 1. ES Volume 4, Appendix 10.6: LVIA Visualisations Claydon House [EN010158/APP/6.4.3] submitted at Deadline 2 and shared with Buckinghamshire Council, showing the viewpoint from the upper floor of Claydon House (from within the “Chinese Room”) confirms the assessment within Annex D that there would be additional visibility from the upper floor of the house. The foreground of the view from Claydon House is of the parkland landscape - solar arrays and the Satellite Collector Compound in Parcel 1 would be visible in the middle distance beyond the boundary of the park. At ground level (including from the terrace on the west side of Claydon House) views of the Solar PV modules would be filtered by existing vegetation within the park and by intervening hedgerows along Orchard Way and along Three Points Lane which will serve to break up the views of panels. From the upper floors of the house there would be visibility of the Solar PV modules and Satellite Collector Compound from the principal elevation on the west side of the house. Views towards the arrays from the south side of the house (including windows facing west on the south side of the house) would be obstructed by topography, the church building and trees around the church. The house is oriented due west, therefore the Solar PV modules to the southwest would not be the main focus of views as they would be seen obliquely from the interior of the house. In addition, the location of solar PV modules within the existing field structure, which itself will be strengthened with additional hedgerow and tree planting, would serve to break up the uniformity of the arrays. The proposed additional avenue tree planting along Three Points Lane will provide additional visual screening whilst avoiding obstruction of the views towards Knowl Hill both at ground level and from within the upper floors of the house. The Applicant has agreed with Historic England and National Trust that the harm to the significance of Claydon House and Claydon Park would be less than substantial and would sit within the lower end of this scale of harm. This agreement is captured within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and Statement of Common Ground with National Trust [EN010158/APP/5.17.2] submitted at Deadline 2.
4.2	4.5.3	Comment that the Proposed Development would affect the relationship of the Claydon House and Park with its satellite farms thereby impacting their setting and the setting of Claydon House and Park.	The satellite farms of Claydon are: Pond Farmhouse (Grade II listed), Muxwell Farmhouse (Grade II listed), Blackmoorhill Farmhouse (Grade II listed), Rosehill Farmhouse (Grade II listed), and Catherine Farm (non-designated heritage asset). It should be noted that the building listed as Blackmoorhill Farmhouse is now known as Winter’s Tale Farmhouse. Detailed assessment of all of these assets including their setting is provided in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The relationship between Claydon House and Park and the Grade II listed buildings of Blackmoorhill Farmhouse and Rosehill Farmhouse will not be altered by the Proposed Development as these two farms lie over 600m north of Orchard Way and the Proposed Development would be to the south of this road outside the land which was likely originally farmed from these properties. ES Volume 2, Chapter 9: Cultural Heritage

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			[EN010158/APP/6.2.2] concludes that the harm to their significance as a result of the changes in their wider setting would be of negligible magnitude and result in a neutral effect which is not significant. Catherine Farm also lies north of Orchard Way, opposite the proposed site access into Parcel 1. The Proposed Development will not impact on the relationship between Catherine Farm and Claydon House and Park as all development will be south of Orchard Way. Solar PV modules within Parcel 1 up to 160m southwest of the farmhouse would be visible on the approaches to the farmhouse along Orchard Way and would be visible from the farmhouse but would be filtered by the existing vegetation along Orchard Way and by the proposed enhancements of these hedgerow boundaries. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the change to the wider setting of Catherine Farm would be an impact of minor magnitude resulting in a slight adverse effect which is not significant. There will be no Solar PV modules around Muxwell Farmhouse due to design changes after Stage 1 Consultation: the fields to the south of Muxwell Farmhouse have been removed from the Order Limits and the fields to the north will be used only for the (below ground) interconnecting cable and returned to agriculture or used for ecological mitigation. There will therefore be no change to the relationship between Muxwell Farmhouse and Claydon House and Park. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the impacts on Muxwell Farmhouse would be negligible in magnitude and result in a neutral effect which is not significant. Pond Farmhouse is currently surrounded by farmland and woodland, it is encircled by the Order Limits (as illustrated on Works Plans [EN010158/APP/2.3.3] [REP1-005]) and the Proposed Development would introduce Solar PV modules into the farmland historically associated with the farmhouse. Solar PV modules have been excluded from Field B5 to the north of the farmhouse (which is the principal approach and elevation as illustrated on ES Volume 3, Landscape and Visual Figures [EN010158/APP/6.3] [APP-069] - see Figure 10.18: RVAA Property Plan – Pond Farm [EN010158/APP/6.3] [APP-069]) and from Field B13A to the east. Additional planting is also proposed along the western boundary of Field B5 to soften views of the Solar PV modules. The effects of the changes to the setting of Pond Farmhouse are acknowledged within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] as resulting in an impact of minor magnitude during construction and decommissioning which would result in a slight adverse effect that is not significant and an impact of moderate magnitude during operation which would result in a moderate adverse effect which would be significant.
4.3	4.5.3	Comment that the Proposed Development would introduce repetitive, geometric forms and lead to a homogenisation of setting, with resulting harm to landscape legibility across its setting.	The layout of the Proposed Development has sought to retain existing woodland blocks and hedgerow boundaries and apply appropriate offsets from woodland, hedgerows and PRoWs, as well as introducing additional planting and the creation of new permissive footpaths, to break up the appearance of the Proposed Development and preserve legibility of the historic landscape character of enclosed fields. The retained vegetation, and new hedgerow and woodland planting, is shown in the Outline LEMP [EN010158/APP/7.6.3] .
4.4	4.5.3	Comment that, when the Proposed Development is taken together with other nearby solar and infrastructure projects, harm will result to: The unique sense of place which contributes to the significance of Claydon House, Claydon Park and the Middle Claydon Conservation Area;	The Applicant disagrees that there would be cumulative harm to Claydon House, Claydon Park and Middle Claydon Conservation Area as a result of the Proposed Development in combination with other nearby solar and infrastructure projects. Other nearby solar and infrastructure projects have been considered within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] . The closest project included in the shortlist of cumulative schemes is the proposed National Grid East Claydon Substation which is likely to be co-located within the Order Limits of the Proposed Development. The proposed siting zone for the National Grid East Claydon Substation is c. 1.6km east of Claydon Park beyond East Claydon village and located within Parcel 3 of

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		- The understanding of their relationship with the surrounding estate; and - The contribution of setting to the assets' significance.	the Proposed Development. It has been assessed to lie outside the setting of Claydon House, Claydon Park and Middle Claydon Conservation Area and therefore would not result in a cumulative effect on these assets. Other solar and infrastructure projects on the cumulative short list likewise lie outside of the areas where the heritage significance of Claydon House, Claydon Park and Middle Claydon Conservation Area are appreciated and therefore will not result in cumulative effects.
4.5	4.5.4	Comment noting that Buckinghamshire Council considers that the impact on Claydon House, its Park and associated landscape to be of less than substantial harm at the middle end of that scale.	The Applicant welcomes the agreement with Buckinghamshire Council that the harm to Claydon House, its Park and landscape is less than substantial. This agreement is detailed within the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] submitted at Deadline 2. The Applicant however maintains that the harm to the significance of Claydon House and its Park and associated landscape is at the lower end of this scale and on this point has reached agreement with Historic England and the National Trust. This agreement is detailed within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and the Statement of Common Ground with National Trust [EN010158/APP/5.17.2] submitted at Deadline 2. The degree of less than substantial harm to Claydon House, its Park and landscape remains a matter under discussion with Buckinghamshire Council.
4.6	4.5.5	Comment noting that Pond Farmhouse (NHLE 1214849), Rosehill Farmhouse (grade II listed building, NHLE 1214846) and Blackmoorhill Farmhouse (grade II listed building, NHLE 1214848) were once satellite farms on what was part of Claydon House's agricultural estate. Further comment that the Proposed Development would disrupt these setting relationships (which have been damaged by HS2, East West Rail and other infrastructure projects) and would change the character of the estate which is a contributory element of their settings.	The effect of the changes to the setting of Pond Farmhouse are acknowledged within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] as resulting in an impact of minor magnitude during construction and decommissioning which would result in a slight adverse effect that is not significant and an impact of moderate magnitude during operation which would result in a moderate adverse effect which would be significant. As noted above, Blackmoorhill Farmhouse and Rosehill Farmhouse are located within parts of the historic estate of Claydon which lie beyond the Order Limits. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the harm to their significance as a result of the changes in their wider setting would be of negligible magnitude and result in a neutral effect which is not significant. HS2 is located c.700m southwest of Pond Farmhouse at its closest point and mitigation planting for HS2 would serve to screen HS2 from view whilst East West Rail lies over 1 km north of Pond Farmhouse and follows the route of the former Oxford and Bletchley Branch of the London and North West Railway (as illustrated on the 1st Edition Ordnance Survey map presented within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]). The Applicant considers that the change to the setting of Pond Farmhouse as a result of these two developments in combination with the Proposed Development would not increase the overall level of effect. East West Rail lies c.200m north of Rosehill Farmhouse and c.500m north of Blackmoorhill Farmhouse and as stated above follows the route of a historic railway line. HS2 is located over 1.2km west of Rosehill Farmhouse and over 1.7km southwest of Blackmoorhill Farmhouse. The Applicant considers that the cumulative effect of the Proposed Development in combination with the two railways on Rosehill Farmhouse and Blackmoorhill Farmhouse would remain negligible. No other infrastructure projects are considered to impact on Pond Farmhouse, Rosehill Farmhouse and Blackmoorhill Farmhouse.
4.7	4.5.6 and 4.5.7	Comment stating that Buckinghamshire Council identify the impact on Pond Farmhouse to be at the upper end of the scale of less than substantial harm and that the harm to Blackmoorhill Farmhouse and	The Applicant disagrees and considers that the level of harm reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] correctly reflects the level of harm, which for Pond Farmhouse is at the middle of the scale of less than substantial and for Blackmoorhill Farmhouse and Rosehill Farmhouse is at the lower end of this scale.

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		Rosehill Farmhouse is less than substantial at the middle of the scale covered by less than substantial harm.	
4.8	4.5.8	Comment stating that Buckinghamshire Council identify less than substantial harm to the grade II* listed St Mary's Church (NHLE 1289625) which sits at the low to middle part of the scale	The Applicant broadly agrees, in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] the level of harm is judged to be at the lower end of the scale of less than substantial.
4.9	4.5.9	Comment noting potential harm to Botolph House (grade II* listed building, 1212143), within Botolph Claydon Conservation Area. Further comment noting that, despite the presence of screening, the contribution of setting to the east can be appreciated and that the Proposed Development (particularly the Solar PV and Main Collector Compound) would compound intrusion in this view, together with existing infrastructure. Further comment that the Proposed Development would give rise to less than substantial harm at the lower end of the scale.	The Applicant welcomes agreement that the harm to the significance of Botolph House is at the lower end of less than substantial harm, as reported in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . This asset had been deleted from ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] in error and the update at Deadline 2 restores it.
4.10	4.5.10 and 4.5.11	Comment noting potential harm to the significance of Botolph Claydon Conservation Area. Comment noting that such harm would arise to views within the Conservation area but also on approach to the Conservation Area. Further comment noting that the landscape would be increasingly dominated by energy infrastructure and that the Buckinghamshire Council consider the impact to arise to be of less than substantial harm, at the middle to upper end of this scale.	The Applicant disagrees and considers that the level of harm reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] correctly reflects the level of harm to the conservation area as being within the lower half of the scale of less than substantial.
4.11	4.5.12	Comment stating that, with regard for the historic environment, the Proposed Development would harm the character of the historic landscape. Further comment stating that whilst the field patterns will remain discernible, the Proposed Development would transform the character of the enclosed land from one of historic villages, a country house and park with its agricultural estate of satellite farms into one dominated by energy and transport infrastructure.	The Applicant acknowledges within ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] that the change to the landscape character within the Order Limits would be significant. However, the Applicant respectfully disagrees with the suggestion that the effects would be industrialising, as noted at paragraph 3.3.38 of the Outline LEMP [EN010158/APP/7.6.3] , which states that "New structural planting, in the form of tree belts and hedgerows, will help to soften and screen built development and integrate it to the existing landscape". As a result of the offsets that have been incorporated into the Proposed Development, ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] confirms that the development would not result in likely significant visual effects on the residents. As set out within the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] in all Parcels, the mass of Solar PV development would be frequently broken up by breaks in Solar PV development, areas of mitigation and wide grass strips. This would help maintain a connection with the rural context of the landscape, combining agrarian characteristics with those of a solar farm. As a result, the Solar PV development would not be oppressive or overbearing within the landscape.

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4.12	4.5.13	Comment noting that the Proposed Development's design has embedded mitigation which has mainly sought to minimise impacts on Claydon House and Park, Botolph Claydon and Pond Farmhouse.	The Applicant welcomes that Buckinghamshire Council recognise the embedded mitigation measures for Claydon House, Botolph Claydon and Pond Farmhouse.
4.13	4.5.14	Comment stating that the location of BESS in Fields D8 and D9 remains harmful to the setting and approaches to the Botolph Claydon conservation area.	The response to paragraphs 4.2.19 and 4.2.25 of the LIR, the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Appendix 1: Letter to Buckinghamshire Council on BESS Locations of this document detail a number of reasons why the proposed BESS has been located within Fields D8 and D9. This includes that Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape when viewed from the east and south which would reduce its prominence on the skyline and reduce the effect on Middle Claydon Conservation Area. As detailed within the Outline LEMP [EN010158/APP/7.6.3] and Works Plans [EN010158/APP/2.3.3] [REP1-005] the siting zone for the BESS has been offset from the PRoW ECL/7/2 that forms the southern approach to Botolph Claydon in order to reduce the effect of the BESS in this part of the setting of the Conservation Area.
4.14	4.5.15	Comment stating that there is the potential for more effective landscape mitigation measures to be implemented to soften the impact of the Proposed Development on the setting or heritage assets.	The Outline LEMP [EN010158/APP/7.6.3] , and Works Plans [EN010158/APP/2.3.3] [REP1-005] set out current proposals for landscape mitigation measures included increasing the height and density of existing hedgerows, new hedgerow and tree belt planting. As detailed in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] , the Proposed Development includes embedded mitigation measures to soften the impact of the Proposed Development which includes appropriate offsets from local settlements and dwellings (including the conservation areas and listed buildings). Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] secures that the detailed Landscape and Ecological Management Plan will be submitted to and approved by the relevant planning authority, in consultation with the Environment Agency and Natural England. The Applicant is open to ongoing discussions with Buckinghamshire Council regarding appropriate mitigation measures.
4.15	4.5.16 to 4.5.44	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), NPPG, and the Vale of Aylesbury Local Plan (2013 – 2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.5.16 to 4.4.44 the LIR.
4.16	4.5.45	Comments noting Buckinghamshire Council's significant concerns with the assessment of impact on the historic environment presented within the Cultural Heritage Chapter. Further comment noting concern with the baseline assessment and stating that overall harm was overall is underreported.	The Applicant maintains that the assessment presented within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] is robust and proportionate to the significance of the heritage assets and the likely harm to this significance in accordance with NPS EN-1, NPS EN-3 and NPPF (see also the Policy Compliance Assessment Tables at Appendix 4 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]).
4.17	4.5.46, 4.5.47 and 4.5.57	Comment that the assessments of significance in the Cultural Heritage Chapter are sometimes too high-level and lacking sufficient supporting baseline evidence.	ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] should be read in combination with the detailed assessments presented within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . The assets included in the detailed assessment

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		Further comment that limited consideration has been had for historic and visual and associative relationships and the ways in which the architecture of these buildings relate to their setting. Further comment noting that the assessment of settings contributions is missed in instances and this provides only a partial understanding of the contribution of setting to the significance of an asset. An example to the above is provided for in Paragraph 4.5.47 of the LIR, which notes assets Botolph House (1212143), Pond Farmhouse (1214849) and Dry Leys Farmhouse (1319271). Further examples are provided for in Paragraph 4.5.57 of the LIR and include consideration of Rosehill Farmhouse and Blackmoorhill Farmhouse.	were agreed with Buckinghamshire Council, this includes Botolph House, Pond Farmhouse, Dry Leys Farmhouse, Rosehill Farmhouse and Blackmoorhill Farmhouse. The detailed setting assessment includes consideration of how setting contributes to the significance of the assets. The “polite” design of Botolph House is recognised within paragraph 2.3.1-2 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] where the symmetry and aesthetic value of the building and its importance as a key building within the Conservation Area is acknowledged. The Applicant respectfully disagrees with the assertion that views out from or distant views towards Botolph House contribute to its significance to any great degree due to the presence of a tall hedge forming the garden boundary and further mature trees on the opposite side of the road. Glimpsed views of the Proposed Development filtered through the vegetation are acknowledged in paragraph 2.3.3 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and less than substantial harm to the significance of the listed building (at the lower end of this scale) is recognised in paragraph 2.3.4 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The negligible impact to the significance of the building is reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and will result in a slight effect which is not significant. The contribution that the surrounding agricultural land makes to the significance of Pond Farmhouse, including the field pattern, land use and connection with Claydon House is recognised within paragraph 2.26.1-2 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2], though the connection is noted as not being visually apparent due to a lack of intervisibility. The impact of the Proposed Development is acknowledged to result in less than substantial harm (within the middle of this range) at paragraph 2.26.4 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] judges this to be a moderate impact resulting in an effect of moderate significance. This effect is acknowledged to be significant. The contribution of setting to the significance of Dry Leys Farmhouse is also acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] at paragraphs 2.19-1-4. The Applicant recognises that there would be an effect of neutral significance to this asset during construction and decommissioning and slight significance during operation within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]. The Applicant has recognised the contribution that the connection with Claydon makes to the significance of both Rosehill Farmhouse and Blackmoorhill Farmhouse within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] (paragraphs 2.28.1-4 and 2.14.1-4 respectively). This connection will not be altered by the Proposed Development which will be located south of Calvert Road and not within the line of sight between the farmhouses and Claydon House which is approximately east-west. ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] Viewpoint 6 (Winter's Tale Farmhouse / Wedding Venue) is taken from outside the Blackmoorhill Farmhouse listed building and shows that the Proposed Development will be largely screened by topography and vegetation in views south from the farmhouse. The Applicant has considered within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] that there would be negligible impacts to these assets, resulting in effects of neutral significance. The level of detail in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] is considered proportionate and appropriate to the effects of the Proposed

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			Development and provides a robust baseline for the assessment in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] .
4.18	4.5.48	Comment that without assessment of the spatial and historic relationships between heritage assets and their wider associated landscape, the assets have been siloed in their assessment and this presents an omission in assessment.	The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Section 9.18, the relevant NPS EN-1 (2023) paragraphs and Policy BE1 of the Vale of Aylesbury Local Plan. These heritage-related policies make clear that a 'heritage asset' can constitute, for example but not limited to, buildings, areas or landscapes. Furthermore, the Applicant recognises, in line with policy, that a heritage asset's significance derives from the sum of its interests and, therefore, the joint consideration of its physical presence and setting. ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] has been prepared and supports ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] in establishing the significance of any affected heritage assets, considering any settings contributions. Furthermore, the key planning policy tests established within the NPPF deal only with impacts or harms to individual affected assets and so the assessment of assets in turn, as undertaken by the Applicant, is policy compliant. The spatial and historic relationships between heritage assets and their wider associated landscape and how these contribute to significance are detailed within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The assets included for detailed assessment were agreed with Buckinghamshire Council and Historic England.
4.19	4.5.48	Comment that the assessment does not meet the policy tests in National or Local Policy.	The Applicant respectfully disagrees. Further to the discussion in the row directly above, the Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) sets out how the Proposed Development and assessment of potential cultural heritage effects complies with and meets the relevant cultural heritage policies at both the national and local level.
4.20	4.5.50	Comment stating that the historic landscape character within the Order Limits is dominated by the presence of regular and irregular enclosures predating the 18th century. Further comment that the historic fieldscape was therefore largely in place at the time the Claydon House and Park was established and that the fieldscape continues to reflect the land use character largely as it was shaped in the 18th century.	ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] includes consideration of both physical impacts and changes to the setting of the post-medieval field systems. The fieldscape within the Order Limits will remain one of regular and irregular enclosures as only limited areas of hedgerow removal are proposed between Fields E11 and E20 for construction of the Rosefield Substation and potential removal of a section of hedgerow to facilitate the Interconnecting Cable Corridor between Parcel 1 and Parcel 2. Land use within the fields will change for the duration of the operational life of the Proposed Development but can be returned back to agriculture on decommissioning. This is acknowledged in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] to represent a moderate magnitude of impact on the non-designated heritage asset and to result in a slight adverse effect which is not significant.
4.21	4.5.52	Comment stating that solar PV will be visible in views from Knowl Hill towards Claydon House and that, whilst not obstructing, the Proposed Development will introduce energy infrastructure into this view.	The introduction of energy infrastructure into the view from Knowl Hill has been acknowledged within the assessment of Claydon House as presented in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and is shown in Illustration 1 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . The Applicant has concluded that the effect of this, along with other changes to the setting and experience of Claydon House will result in less than substantial harm and would sit within the lower end of this scale of harm. The Applicant proposes a permissive path to Knowl Hill along with interpretation boards to enable views of Claydon House from Knowl Hill to be appreciated by the public and to increase public

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			understanding of the designed landscape around Claydon. The permissive path and interpretation board(s) are secured through the Outline LEMP [EN010158/APP/7.6.3] ,
4.22	4.5.53	Comment stating that the Proposed Development will alter the historic landscape character of the wider estate landscape to the south of Orchard Way, diminishing its contribution to the significance of Claydon House, Claydon Park, and Middle Claydon Conservation Area as part of the picturesque and agricultural setting of the designed landscape and country house. Further comment stating that the Proposed Development impacts the landscape by introducing energy infrastructure in the fieldscape and establishing an infrastructure dominated landscape which diminishes understanding of the estate landscape and the historic connection between these assets and surrounding estate farms such as Pond Farmhouse, Blackmoorhill Farmhouse and Rosefield Farmhouse.	The effect of changes to the character of the wider estate landscape is acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] which concludes that the harm to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area will be negligible. The picturesque views from Claydon House will be altered by the presence of Solar PV modules and the Satellite Collector Compound within Parcel 1 but the Applicant has minimised these effects by removing potential for Solar PV from Field B17 (Knowl Hill), constraining the siting zone for the Satellite Collector Compound in Parcel 1 and proposing additional planting along Three Points Lane to provide additional screening without interrupting the designed view from Claydon House to Knowl Hill. Please see the Applicant's response above to paragraph 4.5.3 of the LIR for more detail on the effect of the Proposed Development on the relationship between Claydon House, Claydon Park and Middle Claydon Conservation Area and surrounding estate farms.
4.23	4.5.54	Comment stating that the location and extent of the Claydon House (MBC20416) asset on Cultural Heritage Chapter Figures is not clear due to a lack of labelling.	Figures in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] have been updated with clearer labelling at Deadline 1.
4.24	4.5.55	Comment that the cumulative impacts of development in the locale will result in harm to the unique sense of place which contributes to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area. Further comment that such harms are in conflict with Paragraph 5.9.25 of NPS EN-1 and VALP Policy BE1.	As noted above in response to paragraph 4.5.3 of the LIR, other nearby solar and infrastructure projects have been considered within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. The closest project included in the shortlist of cumulative developments is the proposed National Grid East Claydon Substation which would be co-located within the Order Limits of the Proposed Development. The siting zone for the National Grid East Claydon Substation is c. 1.6km east of Claydon Park beyond East Claydon village. It has been assessed to lie outside the setting of Claydon House, Claydon Park and Middle Claydon Conservation Area and therefore no cumulative impact is predicted to these assets. Other infrastructure projects are likewise considered not to cumulatively impact on the significance of Claydon House, Claydon Park or Middle Claydon Conservation Area as they lie outside of the setting of these assets. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) provide assessment of the Proposed Development against Paragraph 5.9.25 of NPS EN-1 (2023) and Vale of Aylesbury Local Plan Policy BE1. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the mitigation measures that have been designed into the Proposed Development accord with the conservation objectives of these policies.
4.25	4.5.56 and 4.5.57	Comment stating that Buckinghamshire Council agree with the Applicant's assessment of harm on Pond Farmhouse but that the nature of the impact has not been accurately established within the Cultural	The Applicant welcomes the agreement that the harm to Pond Farmhouse is less than substantial. The assessment with ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] has appropriately and accurately detailed the nature of the impact. The Applicant has

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		Heritage Chapter. Further comment that the Proposed Development will industrialise the setting of the farmhouse. Further comment noting the contributions of mitigation but that intervisibility will remain from the upper floors of the farmhouse. Further comment that the setting will be further diminished by the proximate HS2 development which will detract from the agricultural character surrounding the Rosehill Farmhouse, Blackmoorhill Farmhouse and Pond Farmhouse. Further comment that the presence of HS2 and East West Rail, together with the Proposed Development, will surround the farmhouses on three sides with infrastructure.	acknowledged the impact of the Proposed Development surrounding Pond Farmhouse and on the setting of the farmhouse and has sought to minimise the effect by removing Solar PV modules and other infrastructure from Field B5 to the north and Field B13A to the east of the farmhouse. The Applicant respectfully disagrees with the assertion that views of Pond Farmhouse from Calvert Road make any substantive contribution to the significance of either the farmhouse or Claydon House as the existing hedgerow vegetation provides effective screening except at the access point (as illustrated in ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] Viewpoint 1b Calvert Cottages) where parts of the farmhouse are visible above hedgerow surrounding its garden. As noted above, HS2 is located c.700m southwest of Pond Farmhouse at its closest point and mitigation planting for HS2 would serve to screen it from view whilst East West Rail lies over 1km north of Pond Farmhouse and follows the route of the former Oxford and Bletchley Branch of the London and North West Railway (as illustrated on the 1st Edition Ordnance Survey map presented within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]). The Applicant respectfully disagrees with the statement considers that the change to the setting of Pond Farm as a result of these two developments in combination with the Proposed Development would not increase the moderate magnitude impact during operation of the Proposed Development and moderate significance of effect on Pond Farmhouse. As noted in the response to LIR paragraph 4.5.57, the impact of the Proposed Development on the significance of Rosehill Farmhouse and Blackmoorhill Farmhouse would be negligible and the effects would be neutral significance. The distances to HS2 and East West Rail from these listed buildings mean that they will retain agricultural land around them, and they will continue to be experienced as historic farmsteads within an agricultural estate, any cumulative impact would therefore also be negligible.
4.26	4.5.58	Comment stating that the tower of St Mary's Church (grade II* listed building, 1289625) would have been visible from across the valley to the east and south east. In the winter it would be visible over elements of the solar farm in views from further east and south east (for example from Viewpoint 27). This would cause less than substantial harm to the church at the low to middle end of the scale.	Viewpoint 27 (ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3]) illustrates that the Proposed Development will not compete with the prominence of the church due to its location on higher ground and as such the Applicant considers that there would be harm at the lower end of less than substantial as reported within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and that this harm would equate to an impact of negligible magnitude and a slight adverse effect which would be not significant. This is reported within the updated ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] submitted at Deadline 2.
4.27	4.5.59	Comment stating that the Proposed Development would compound intrusion in the views from/to Botolph House (grade II* listed building, 1212143) resulting from the existing presence of existing pylons, due to the introduction of additional large-scale energy infrastructure. Further comment that the settings assessment does not identify the contribution to significance of views from the building across the Vale of Aylesbury or assess the impact upon significance resulting from changes to this view.	The setting assessment of Botolph House presented in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] states "Views from the house over the surrounding fields are filtered by mature trees and make a small contribution to the significance of the building as part of the rural settlement." Likewise, views of Botolph House from the surrounding area are filtered by this vegetation and with the exception of close range views from Botyl Road do not contribute to its significance. Visibility of the Proposed Development from Botolph House will therefore be filtered by existing vegetation and the effect on Botolph House of the Proposed Development in combination with the existing pylons and substation would be slight adverse and not significant, as reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]. Although taken from further north than Botolph House, Viewpoint 13 in ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] shows a similar view across the Vale of Aylesbury to that experienced from the gap in the hedgerow opposite the northern corner of Botolph House. ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] notes that the view east is "across fields gently

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			descending to within the Claydon Vale...[and that] some agricultural buildings are visible as is the settlement of Granborough on rising land to the east. A prominent line of pylons traverses the view in a broadly southerly direction". It goes on to state that construction/decommissioning activity would be visible in Fields E11 and E20-23 approximately 950m to the east and that during operation Solar PV development in Fields E21 and E23, the Main Collector Compound in Field E22 and Rosefield Substation in Fields E11 and E20 would be visible in the context of existing pylons, mitigation planting would partially screen and soften these views from Year 10. Views of the higher ground east of the Vale would therefore not be obstructed but new development would be visible on the lower lying ground. The setting assessment concludes that the filtered views of the Solar PV development, Rosefield Substation and Main Collector Compound will have a negligible impact on the significance of Botolph House, representing harm at the lower end of less than substantial harm and a slight adverse effect which is not significant.
4.28	4.5.61	Comment stating that the Proposed Development (solar PV and BESS) would create an industrial presence to approaches to Botolph Claydon. Further comment stating that there is an overall change in setting from a historic agricultural landscape to a power-generation landscape which harms the Botolph Claydon Conservation Area's rural character and degrades the contribution of setting to its significance.	As set out in the response to paragraphs 4.4.3 and 4.4.68 of the LIR above, whilst ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] acknowledges that there would be a significant change to the landscape character within the Order Limits, However, as set out in the response to paragraph 4.5.63 and 4.5.64 of the LIR below, the Applicant respectfully disagrees that there would be an industrialising effect on the landscape character. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the change in the wider agricultural surroundings of Botolph Claydon would result in a low level of less than substantial harm. This is because the heritage significance of the Conservation Area does not just derive from the landscape character of its setting but also from elements such as individual buildings (both listed and non-designated) and spaces within the Conservation Area which provide its character and appearance. There will be no physical change to the Conservation Area and therefore the impact on its heritage significance of altering the character of its surroundings will be less than the impact on the landscape character of those surroundings themselves.
4.29	4.5.62 and 4.5.63	Comment stating that Buckinghamshire Council remains concerned about the loss of agricultural land use character across this area which contributes to the understanding of the Botolph Claydon Conservation Area as a historic agricultural village. Further comment that development in Parcel 3 will impact the setting of the conservation area.	The contribution of the agricultural land use character to the significance of the Botolph Claydon Conservation Area is acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . The Applicant considers that the harm to the significance of the conservation area as a result of the presence of the Proposed Development within this setting would be at the lower end of less than substantial harm.
4.30	4.5.63 and 4.5.64	Comment stating that the Proposed Development would also be visible in long views towards the Botolph Claydon Conservation Area from the east across the Vale above and between hedgerows lining the roads. The presence of the Proposed Development would compound intrusion in these views resulting from the presence of existing pylons, due to the introduction of additional large-scale energy infrastructure, industrialising the landscape and conflicting with its established visual rural character, adversely impacting the significance of the conservation area. Further	The Applicant respectfully disagrees that there would be an industrialising effect on the landscape as a result of the Proposed Development after mitigation. The Design Approach Document [EN010158/APP/5.8.2] [REP1-018] details the embedded mitigation measures that form part of the Proposed Development to soften the impact which includes offsets from the local villages (including Botolph Claydon and East Claydon) to minimise the impact on their character, management of hedgerows to increase their height, infill gaps and ensure their longevity to soften views of the Proposed Development and discounting Solar PV development from specific fields within the Order Limits to break up the amount of development along footpaths. In Parcel 2, 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 Quinton Hill and its landscape context. In Parcel 3, the Mid Shires Way

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		comment stating that the relevant assessment does not comply with NPS EN-1.	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. The Applicant considers that the embedded and proposed mitigation measures would result in less than substantial harm (at the lower end) to the significance of the Botolph Claydon Conservation Area. The Applicant respectfully disagrees with the comment that the Proposed Development does not comply with the relevant policies written into NPS EN-1 (2023). The Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) set out how the Proposed Development and the relevant assessment of potential effects on cultural heritage receptors complies with the relevant cultural heritage policies established within NPS EN-1 (2023).
4.31	4.5.66	Comment stating that the Proposed Development will transform the character of the historic landscape within the Order Limits, ending its historic use as a working historic agricultural fieldscape and will ultimately result in harm. Further comment that, when considered in combination with surrounding developments such as HS2, East West Rail, and other energy schemes such as Tuckey Solar Farm, the Proposed Development will have resulted in the progressive, piecemeal erosion of historic landscape character with the large-scale presence of energy and transport infrastructure degrading the significance of a historic agricultural estate.	As set out in the response to paragraph 4.5.63 of the LIR above, the Applicant respectfully disagrees that the Proposed Development would result in any more than low levels of less than substantial harm to the surrounding historic environment character. The Proposed Development would introduce solar PV development into fields currently in agricultural use but the only long term loss of agricultural land use would be within the area of the Rosefield Substation and BESS. The Collector Compounds would have the appearance of agricultural buildings and the Outline LEMP [EN010158/APP/7.6.3] includes for areas of grazing under and around the Solar PV.
			Adequacy of Mitigation
4.32	4.5.2	Comment that potential harm would arise from solar infrastructure across agricultural fields to the south of Orchard Way within former estate land associated with Claydon House. Further comment that mitigation measures for the benefit of the setting of Claydon House and Park and Middle Claydon Conservation Area (which include removing the panels from the slopes of Knowl Hill and the reinforcement of the poplar avenue along Three Points Lane) will reduce intrusion in views from Claydon House and Park from the Proposed Development.	As set out in the responses to paragraphs 4.5.3, 4.5.4, 4.5.50, 4.5.52, 4.5.53 and 4.5.55 of the LIR above, ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that with the proposed mitigation, the introduction of Solar PV development within former estate land associated with Claydon House would result in low levels of less than substantial harm to Claydon House and Park and Middle Claydon Conservation Area. The Applicant welcomes the agreement that the mitigation measures proposed will reduce intrusion into views from Claydon House and Park. This agreement is captured within the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] .
4.33	4.5.51	Comment noting that the Applicant's removal of solar PV from the slopes of Knowl Hill and reinforcement of the poplar avenue along Three Points Lane will reduce visual intrusion to and from Claydon House and Park. Further comment stating that Buckinghamshire Council	The Applicant respectfully disagrees that the assessment of impacts on Claydon House, Claydon Park and Middle Claydon Conservation area is poorly founded. The assessment of these assets has followed Historic England guidance and the level of harm to Claydon House has been agreed with Historic England and National Trust and the level of harm to Claydon Park has been agreed with National Trust, this agreement is detailed within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and Statement

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		remain concerned by settings impacts on Claydon House, Claydon Park, and Middle Claydon Conservation Area. Further comment noting that they consider the Applicant's assessment of impacts on these assets to be poorly founded.	of Common Ground with National Trust [EN010158/APP/5.17] submitted at Deadline 2. Historic England defer to Buckinghamshire Council on the Middle Claydon Conservation Area but it should be noted that Middle Claydon Conservation Area covers largely the same area as Claydon Park with the addition of an area of houses to the north of the park. The Applicant welcomes the agreement that removal of Solar PV development from the slopes of Knowl Hill will reduce visual intrusion to and from Claydon House and Park. The Applicant maintains that the harm to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area would be at the lower end of less than substantial as reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2].
4.34	4.5.51	Comment that more accurate assessments may assist with the refining of mitigation and that it is noted that the Applicant is proposing additional visualisations from Claydon House's principal upper floor rooms.	The Applicant used a virtual 3D model of the Proposed Development to assess the effects from areas of Claydon House that were not accessible at the time of the assessment. Visualisations from the upper floor rooms of Claydon House have been submitted at Deadline 2 (ES Volume 3, Figure 10.6: Viewpoint locations [EN010158/APP/6.3] [APP-069]). These visualisations show that the 3D model overestimated visibility of the Proposed Development from Claydon House, meaning that the conclusions drawn were robust. The visualisations have been shared with Buckinghamshire Council, Historic England and National Trust. The visualisations show that the proposed planting within Parcel 1 would act as effective screening for the Solar PV modules and Satellite Collector Compound from Claydon House. They also show that there would not be visibility of Solar PV modules beyond Knowl Hill (as assessed based on the 3D model used for the assessment) and therefore the visual intrusion into the view would be less than reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The Applicant considers that the harm to the significance of Claydon House would remain as reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2], that is a low level of less than substantial harm equating to an impact of minor magnitude and slight adverse effect which is not significant.
4.35	4.5.55	Comment noting the Applicant's incorporation of mitigation measures but stating that these measures do not address the impact of homogenisation of the setting of Claydon House and Park resulting from the introduction of the repetitive, geometric forms of the solar arrays, and the resulting harm to landscape legibility across its setting	As set out within the response to paragraph 4.5.3 of the LIR above the Applicant respectfully disagrees that the Proposed Development would result in homogenisation of the setting of Claydon House and Park. The new hedgerow and woodland planting as shown and secured in the Outline LEMP [EN010158/APP/7.6.3], and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] will break up the appearance of the Solar PV development and provide screening of the Proposed Development in views from Claydon House and Park and from the approaches both by road and by PRoW. The legibility of the landscape around Claydon House and Park and the contribution that it makes to the significance of the designated heritage assets will therefore be largely retained. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] deals more fully with the effects on the landscape character and concludes that there would be significant effects within the Order Limits.
4.36	4.5.68, 4.5.69 and 4.5.70	Comment noting engagement with the Applicant on archaeology matters with written clarifications of the amendments required within the Draft Archaeology Management Strategy. Further comment noting which of the matters the Applicant deemed acceptable to	The Applicant has continued to engage with the Archaeological Advisor to Buckinghamshire Council and has amended the Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094] at Deadline 1. The Applicant maintains that the approach taken is consistent with emerging good practice and the

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
4.37		include in the Draft Archaeology Management Strategy.	Buckinghamshire Council Archaeological Advisor has agreed that the emerging good practice advocates for targeted trenching rather than blanket percentages.
	4.5.71	Comment noting that Buckinghamshire Council awaits a revised Draft Archaeology Management Strategy to consider whether the wording is suitable.	The Applicant submitted a revised Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094] at Deadline 1. This amended document is acceptable to Buckinghamshire Council and has been agreed with them. This is detailed in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] .

Table 3-5: Cumulative Effects

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Cumulative Effects from the Proposed Development and Other Projects			
5.1	4.16.2	Comment noting Buckinghamshire Council remain significantly concerned about the cumulative effects of the Proposed Development, including in respect of these issues, which principally relate to landscape and ecological matters. Further comment that there is a notable absence of consideration of other topics previously highlighted as important in this context, including heritage and human health matters. Buckinghamshire Council considers that, currently, there is insufficient clarity about how the mitigation measures for cumulative impacts will be effective in addressing the full range of likely significant cumulative effects, and further detail on scope and implementation is sought.	The cumulative assessment in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] considers all environmental topics, including cultural heritage and population, which are presented in Tables 17.4 and 17.5. These tables demonstrate that each topic was systematically assessed for potential cumulative effects, with several heritage and human health receptors carried forward to Stage 2 for detailed consideration. Where such receptors were assessed in Stage 2 (Tables 17.6 and 17.7), it was concluded that all resulting cumulative effects were not significant once the standard topic specific mitigation measures were applied. As no significant cumulative effects were identified for any topic, no additional cumulative-specific mitigation has been proposed. Nevertheless, all relevant mitigation set out in the ES topic chapters is secured through the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline LEMP [EN010158/APP/7.6.3] and Design Commitments [EN010158/APP/5.9.4], both secured as Requirements in the DCO [EN010158/APP/3.1.4]. In addition to the mitigation measures, the Proposed Development incorporates a range of embedded design measures intended to avoid and/or reduce significant cumulative effects through the placement of infrastructure. These measures are secured within the Design Commitments [EN010158/APP/5.9.4].
5.2	4.16.15	Comment noting that the Applicant's cumulative assessment substantially underestimates the scale, nature and significance of cumulative harm arising in this location.	ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] undertakes a comprehensive assessment of the cumulative context, including all projects listed by Buckinghamshire Council in Paragraph 4.16.15, and additional schemes identified through the long-list and short-list methodology, which has been agreed with Buckinghamshire Council. This approach aligns with the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024) guidance and applies a precautionary 10km Zone of Influence. While the Applicant acknowledges that this is an area subject to multiple large-scale developments, the assessment concludes, based on detailed topic-level evaluation, there would only be potential significant inter-project cumulative effects on landscape and visual receptors, and Bechstein's bats. The potential impact on landscape and visual receptors is due to an increase in significant effects as a result of combined effects on Landscape Character Area 9.2: Quanton 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 be experienced 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 impact 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. 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. Additional mitigation is specified and secured in the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], and Outline LEMP [EN010158/APP/7.6.3].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
5.3	4.16.16	Comment stating that the Applicant's Environmental Statement fails to recognise that cumulative effects in this location are not merely additive but compounding. Further comment noting that each further development introduces new layers of infrastructure, human activity, construction traffic, movement, noise, visual massing, lighting and land-use change, creating a downward trajectory in landscape quality and a progressive erosion of rural character. Further comment noting that introducing a large, industrial-scale BESS into this cumulative baseline would intensify and accelerate an ongoing landscape transformation from rural to industrial, fundamentally altering the experiential qualities of the area.	The Applicant acknowledges that, as set out in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3], there is potential for significant inter-project cumulative landscape and visual effects in combination with other developments in the area. The assessment identifies that these neighbouring schemes collectively contribute to a more complex and infrastructure-influenced baseline in parts of the surrounding area, including some elevated viewpoints. These findings are clearly reported in the chapter. The Proposed Development incorporates substantial embedded mitigation, including vegetative screening, careful siting of infrastructure, and minimisation of vertical massing, which limits its incremental contribution to wider cumulative change. For other environmental topics, such as noise, traffic, lighting, human health, or land-use change, the Proposed Development does not introduce additional significant cumulative effects. Appropriate mitigation for landscape and visual cumulative effects is secured through the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline LEMP [EN010158/APP/7.6.3], and Design Commitments [EN010158/APP/5.9.4].
5.4	4.16.17	Comment noting that the Applicant's inclusion as part of the description of the topography that the Site is "relatively flat" is not supported by evidence and fails to acknowledge that undulation increases intervisibility, making the cumulative mass of energy infrastructure more prominent from multiple directions and over long distances. Further clarity around this distinction would be required.	As set out in paragraphs 10.5.7-10.5.16 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] the topography of the study area is described as "varied" and this is reflected in the selection of viewpoints illustrated in ES Volume 3, Figure 10.6: Viewpoint Locations [EN010158/APP/6.3] [APP-069]. However, as illustrated in ES Volume 3, Figure 17.9b: Cumulative ZTV – All Cumulative Sites – Screening [EN010158/APP/6.3.2] [REP1-046] it is noted that all cumulative sites are located in lower lying and relatively flat landscapes, which has a bearing on their perception depending on the type and extent of development. In all cases, the cumulative impacts on landscape and visual receptors assessed within the ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] and ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3] consider more elevated and longer distance views where cumulative schemes are potentially visible.
5.5	4.16.18	Comment noting that the Applicant limits its cumulative heritage assessment to narrow visual interactions, overlooking broader effects on tranquillity, landscape coherence, and the ability to appreciate the historic evolution of the Claydon Estate and surrounding settlements. Clarity on why the assessment was narrowed would be requested.	The cumulative assessment presented within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] has considered how the Proposed Development will affect heritage assets when operating in combination with other developments. Noise effects that might influence tranquillity would be limited to the construction and decommissioning phases and would be localised in nature, and the cumulative effect on the significance of individual heritage assets of this noise in addition to other developments would be minimal and therefore it has not been included within the assessment. As set out within the Applicants response to paragraphs 4.5.3 and 4.5.6 of the LIR in Table 4-4 above, the cumulative schemes either lie outside the setting of the heritage assets impacted by the Proposed Development or would not result in additional effects. East West Rail utilises a historic railway corridor and therefore will not alter the landscape coherence, HS2 is situated sufficiently distant from Claydon House, Botolph Claydon and East Claydon that the legibility of its estate landscape and how this evolved with its surrounding settlements will be unaltered and other solar farms and other development likewise lie outside of the estate and will not affect the ability to appreciate the relationships between Claydon Park and the Claydon villages.
5.6	4.16.19	Comment noting that the cumulative concentration of major schemes around key woodland complexes heightens the risk of bat habitat fragmentation,	Potential cumulative impacts arising from other projects has been assessed within the ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. 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

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
5.7		disturbance and degradation. Further comment noting that the Cumulative Effects Chapter does not account for this concentrated pattern of influence, nor does it assess the role of the Proposed Development in tipping certain ecological pressures beyond thresholds of resilience.	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. The Proposed Development's design 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/7.6.3]) which is a substantial net gain. ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] 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 have focused on protecting and enhancing Bechstein's bat foraging and commuting habitat. With regards to habitat fragmentation, as already noted, the landscape and ecological mitigation measures and enhancements are designed to reduce fragmentation and ensure that wildlife can still move through the wider landscape, and include field margins comprising a mosaic of scrub and grassland. Enhancement of existing hedgerows and new hedgerow creation is proposed.
	4.16.21	Comment noting that the Cumulative Effects Chapter fails to provide a proportionate or accurate evaluation of the cumulative harm arising in this location. A more realistic assessment demonstrates that the Proposed Development would significantly exacerbate an already exceptional cluster of infrastructure, tipping the balance firmly against consenting the Proposed Development.	ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] provides a proportionate evaluation of cumulative harm that is aligned with the EIA 2017 Regulations and the Planning Inspectorate's Advice Note on Cumulative Effects Assessment. The chapter recognises the presence of multiple large-scale developments in the surrounding area and assesses their potential interactions with the Proposed Development using a transparent, receptor-focused methodology. The assessment applies a precautionary 10km Zone of Influence and includes all relevant infrastructure projects identified through the long-list and short-list process agreed with Buckinghamshire Council. This ensures that the cumulative baseline is appropriately characterised and that the assessment captures realistic spatial and temporal interactions. The assessment evaluates inter-project cumulative effects across all topic areas using the residual effects reported in ES Topic Chapters . This evidence demonstrates that the Proposed Development's contribution to cumulative environmental change is limited for most topics due to the scale, design approach, and mitigation embedded within the Proposed Development. The conclusion that only certain landscape and visual receptors, and Bechstein's bat, may experience potential significant inter-project cumulative effects is based on the evidence available. Targeted mitigation for these topics is secured through the Outline CEMP [EN010158/APP/7.2.3] , Outline LEMP [EN010158/APP/7.6.3] and Design Commitments [EN010158/APP/5.9.4] . Section 9.26 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] reviews the Proposed Development in the context of planning policies relating to cumulative effects. The section concludes that the wider benefits of the Proposed Development outweigh the residual adverse inter-project cumulative effects identified in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] .
	Co-ordination with Other Projects in the Vicinity		
5.8	4.16.3	Comment noting concern regarding the cumulative transport implications of the Proposed Development, when considered in the context of other developments. Further comment that it is likely that multiple projects	The Applicant has reviewed all relevant applications and has identified that no other schemes are proposing to use the access route from the A41 that the Proposed Development is proposing. Common projects on the A41 have been included and details are provided in ES Volume

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		will collectively rely on common access routes and contribute to impacts on the same selection of villages and communities. Further comment noting that there is insufficient information within the Applicant's submission to satisfy Buckinghamshire Council that robust cumulative transport assessment has been undertaken and that effective mitigation is incorporated.	2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. This assessment will be further monitored as the status of further schemes becomes apparent. Schemes to the north of the Proposed Development such as the National Grid East Claydon Substation, East Claydon BESS, East Claydon Greener Grid Park all use alternative routes to site and roads outwith the study area agreed with Buckinghamshire Council. The Applicant will liaise with other developers on joint traffic management matters and has signed a Statement of Common Ground to that effect with HS2 for example (Draft Statement of Common Ground with High Speed 2 Limited [EN010158/APP/5.19] [REP1-030]). This is also secured within Section 2.22 of the Outline CEMP [EN010158/APP/7.2.3].

Table 3-6: Health and Wellbeing

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Assessment Methodology and Adequacy			
6.1	4.6.1	Comment that as raised at the Relevant Representation stage, Buckinghamshire Council believe the Environmental Statement does not provide a clear or integrated assessment of likely significant effects on health. Further comment that they remain of the view that such work should be done, noting the ExA has invited the Applicant to do so.	The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, which aims to more clearly present the effects on health and wellbeing in accordance with NPS EN-1, NPS EN-3 and guidance produced by ISEP. The Applicant recognises that Buckinghamshire Council will wish to review this report and comment at subsequent deadlines, though will also be seeking to engage bilaterally on the matter, and is hopeful that the document will satisfactorily address Buckinghamshire Council's concerns. A further iteration of the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1-127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change.
6.2	4.6.17	Comment that relevant health requirements are addressed separately across the Environmental Statement and summarised qualitatively rather than through a health lens. Further comment that the Health and Wellbeing Summary Statement does not set out methods, evidence or assessment needed to support a reasoned conclusion on overall significance of health effects.	The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, intended to provide a clear assessment of the health and wellbeing effects of the Proposed Development, in-line with standard industry guidance and in accordance with the requirements of legislation and national policy. The Health Effects Report sets out methods, evidence and assessment needed to support a reasoned conclusion on overall significance of health effects. This has the benefit of providing a clear application of standard health guidance as an additional layer to the topic-specific methodology, in terms of the significance of health effects related to those assessments – which includes consideration (determined by ISEP guidance on assessing the significance of health and wellbeing effects) of: • The ability to deliver current health policy and/or the ability to narrow health inequalities, as evidenced by referencing relevant policy and effect size and in the context of community feedback on the importance of effects; • Effects in the context of regulatory thresholds or statutory standards; • Potential changes in the health baseline of the population; and • Health priorities for the relevant study area. The Health Effects Report includes: • A description of the likely significant effects on health, as determined by the scope for identifying those wider determinants of health relevant to the Proposed Development, drawing on reported impact assessment from the ES, including a review of the additional mitigation related to avoiding, reducing or managing health effects that may otherwise contribute to adverse impacts on mental health and wellbeing as a result of the Proposed Development; and • An assessment of the residual effects on health, by wider determinant of health, as a result of the Proposed Development. This takes into account the sensitivity of the receptors, embedded and additional mitigation and the magnitude of change as a result, applying health-specific criteria.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Significance of Effects			
6.3	4.6.18	Comment that the Health and Wellbeing Statement does not, in its current form: • provide a consolidated Population and Health assessment; • apply ISEP Health in EIA methodology; • identify vulnerable groups to enable reporting on differential health effects experienced by the wider population; • present health-specific significance criteria; or • provide an overall judgement on likely significant health effects, through a human health lens.	While the Applicant is satisfied that an assessment of determinants and pathways to health and wellbeing effects on specific populations and sub-populations has been provided throughout the ES, the Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, intended to provide a clear assessment of the health and wellbeing effects of the Proposed Development, in-line with standard industry guidance and in accordance with the requirements of legislation and national policy. The Health Effects Report: • Provides a consolidated assessment of health and wellbeing effects of the Proposed Development on populations and sub-populations, drawing on assessments across the ES but also through a health lens; • Explicitly applies ISEP methodology relating to the assessment of determinants/pathways, magnitude, sensitivity and significance of potential effects on health and wellbeing; • Identifies the sub-populations and characteristic groups and receptors more likely to experience differential or disproportionate effects on health (including driven by vulnerability to health inequality and types of effects based on their characteristics); and also provides a baseline / context for the prevalence of these sub-populations/characteristics around the Site. ○ The Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]) draws conclusions based on a consideration of the baseline using national statistics and public health data at a ward level. In most cases, self-reported health, health outcome metrics, metrics for risk factors and wider determinants are reported to be better than the national average. ○ At a ward scale, the population does not have a particularly sensitive age profile, and there is no reported community in severe deprivation at the granularity available. However, it is noted that in some cases public data is disclosive and limited at a community level. ○ It should be noted that the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1-127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change.; • Assesses significance and provides a conclusion for overall health effects (by determinant) including: ○ A description of the likely significant effects on health, as determined by the scope for identifying those wider determinants of health relevant to the Proposed Development, drawing on reported impact assessment from the ES, including a review of the additional mitigation related to avoiding, reducing or managing health effects that may otherwise contribute to adverse impacts on mental health and wellbeing as a result of the Proposed Development; and ○ An assessment of the residual effects on health, by wider determinant of health, as a result of the Proposed Development. This takes into account the sensitivity of the receptors, embedded and additional mitigation and the magnitude of change as a result, applying health-specific criteria.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
6.4	4.6.19	Comment requesting that the Applicant update the Environmental Statement to make it clear whether effects on human health are significant or not and identify the degree to which any proposed mitigation measures would reduce the significance of effects..	The Health Effects Report (Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056]) submitted at Deadline 1 sets out a clear assessment of significance, applying significance criteria defined by ISEP guidance, of health effects by determinant of health relevant to the change caused by the Proposed Development, in the context of sensitivity of populations, sub-populations and receptors to change. This includes a description of effects prior to additional mitigation, in order to inform a review of the additional mitigation measures recommended in relation to avoiding, reducing or managing health effects that may otherwise contribute to adverse impacts on health as a result of the Proposed Development. The Health Effects Report (Annex A to the ES Volume, - Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]) concludes that the potential for health effects at the population scale are limited and that wider determinants of health considered are unlikely to result in significant adverse effects for the population. It is noted that in some instances, sub-populations and individual receptors may be more sensitive, and residual significant effects related to landscape and visual change may have the potential to lead to adverse health pathways with in some localised, temporary and spatially-limited effects – however these are not likely to result in significant health effects at the assessed scale.

Table 3-7: Land and Groundwater

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Adequacy of the Assessments			
7.1	4.10.1	Comment that the Proposed Development may give rise to disturbance of existing contamination, potential introduction of new contaminant sources during construction, operation and decommissioning, and limited physical effects on underlying geology. Further comment that only limited groundwater investigation has been undertaken, so further investigation required, particularly on groundwater depth, flow regime, and geotechnical characteristics.	The Applicant has assessed the potential for the Proposed Development to give rise to disturbance of existing contamination, the potential for introduction of new contaminant sources and the potential for physical effects on underlying geology, and concluded that any residual effects after mitigation will not be significant (ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]). No direct infiltration into the ground is proposed as part of the drainage proposals, and where partial infiltration is allowed within road swales, pre-treatment of flows is expected to be achieved. Adequate pollution control is proposed within drainage networks across the Proposed Development to mitigate potential introduction of new contaminant sources. It is noted that ground investigation work completed to date was preliminary, and the Applicant has committed to further detailed ground investigation work (Outline CEMP [EN010158/APP/7.2.3]), which will specifically investigate the potential presence of existing contamination, the existing groundwater regime and the shallow geological conditions. This will ensure that the initial conceptual site model derived for the site based on desk-based information can be refined based on the site-specific ground investigation results. The proposed ground investigation will be undertaken to collect data relating to geotechnical issues, as well as investigating any potential contamination issues. For more detailed information relating to this item, the Applicant refers the reader to the following responses: • With respect to the potential for the Proposed Development to give rise to disturbance of existing contamination, see the response to RR-26 (Effects on Groundwater), starting on page 93, and the response to RR-26 (Monitoring) on page 96 (both in Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]). This issue is also assessed within ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123], and ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]. • With respect to the potential for introduction of new contaminant sources, this is assessed within ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]. Mitigation measures are provided in the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline DEMP [EN010158/APP/7.4.3], Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.3] and Outline Drainage Strategy [EN010158/APP/7.11.3]. • With respect to the potential for physical effects to occur on underlying geology, further details are provided on page 89 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]. 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/6.2.2] [REP1-038] for the construction phase,

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Section 11.8.4 for the operation (including maintenance) phase and Section 11.8.7 for the decommissioning phase.
7.2	4.10.2	Comment that there is uncertainty related to the siting of BESS in locations where shallow groundwater may be present, therefore additional information is required to confirm suitability of locations.	An intrusive site investigation is proposed, as secured in the Outline CEMP [EN010158/APP/7.2.3]. The scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, where appropriate) prior to any works commencing. This will provide site-specific information on the existing groundwater regime, so that groundwater levels in BESS siting locations can be measured, and this information can be taken into account when finalising the design of below-ground structures and features. Specific mention of mitigation measures to address any potential impacts on shallow groundwater in the BESS location are made in the Outline CEMP [EN010158/APP/7.2.3], to ensure that necessary mitigation measures relating to this issue are secured. Further details are provided in the response to RR-26 (Approach to Assessment), starting on page 90 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and in the Outline Drainage Strategy [EN010158/APP/7.11.3]. The Outline BSMP [EN010158/APP/7.9.3] also outlines clear mitigation measures in the event of BESS thermal runaway event. This document ensures environmental protection is maintained in the event of a BESS fire, including measures such as firewater containment; isolation and segregation through automatic and manual isolation valves; separate containment around BESS infrastructure to ensure segregation of potentially contaminated fire water through spill pathways; providing details of on-site testing and disposal procedures for both firewater and aggregate subbase which may be contaminated following a BESS fire. The additional detail of maintenance and specific mitigation will be included in the detailed Battery Safety Management Plan once the battery system to be used on site is known.
7.3	4.10.3 to 4.10.17	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), the Vale of Aylesbury Local Plan (2013 – 2033) and the Buckinghamshire Minerals and Waste Local Plan (2016-2036).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.10.3 to 4.10.17 the Local Impact Report.
7.4	4.10.19	Comment that the land and groundwater assessment relies on assumption of low contamination potential without presenting sufficient evidence to substantiate this. Further comment that there remains uncertainty around baseline land quality and contamination pathways due to limited scope of investigation data.	The assessment conclusions rely on the fact that mitigation in relation to contamination (if present) will be completed prior to construction works commencing (and that any such required actions are secured by the Outline CEMP [EN010158/APP/7.2.3]). Therefore if land or groundwater is contaminated, any risks from this will be resolved prior to construction work commencing, meaning that there will be a low contamination potential after secured ground investigation and associated remediation (if required) have been completed. An intrusive site investigation is secured by the Outline CEMP [EN010158/APP/7.2.3] and the scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, as appropriate). If this identifies any contamination that needs to be addressed, and any subsequent

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			monitoring and remediation will also be agreed with Buckinghamshire Council and the Environment Agency (as appropriate). Further details explaining the approach are provided in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2].
7.5	4.10.22	Comment that the assessment of geological impacts is limited, with Buckinghamshire Council requiring a more detailed characterisation of geological units, their sensitivity to earthworks, and their relationship to groundwater behaviour which would strengthen the assessment and is expected to be addressed through the forthcoming ground investigation.	An assessment of geological units was scoped into the environmental impact assessment, and this element of the assessment was updated for Deadline 1 to provide more details on potential physical effects on geological units (and potential related effects on groundwater receptors), as reported in ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]. The assessment concluded that by adhering to all required mitigation measures, changes to the physical characteristics of the geological units would not cause resultant significant changes to the groundwater quality or quantity. Further ground investigations, which will obtain information on the underlying ground conditions and will include ground gas and groundwater monitoring, will be completed prior to construction works commencing, as set out in the Outline CEMP [EN010158/APP/7.2.3] and the report will be issued to the Local Planning Authority. This will provide further information relating to potential pollutant linkages that were identified by ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123]. Following the completion of the ground investigation works, the Mineral Safeguarding Assessment will be updated and issued to the Local Planning Authority. The ground investigation works will provide more detailed characterisation of geological units, their sensitivity to earthworks and their relationship to groundwater behaviour. Further information relating to the potential effects on geological units from the construction, operational and decommissioning phases of the Proposed Development was provided in the response to RR- 26 (Effects on Groundwater, starting on page 93) within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006].
7.6	4.10.23	Comment that additional hydrogeological assessment will be essential to confirm that the proposed BESS locations do not pose an unacceptable risk to groundwater and are resilient to shallow groundwater conditions.	An intrusive site investigation is proposed, as secured in the Outline CEMP [EN010158/APP/7.2.3]. The scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, where appropriate) prior to any works commencing. This will provide site-specific information on the existing groundwater regime, so that groundwater levels in BESS siting locations can be measured, and this information can be taken into account when considering potential risks to groundwater associated with the BESS location, when finalising the design of below-ground structures and features, and with determining what mitigation measures would be necessary to protect the groundwater receptors. Specific mention of mitigation measures to address any potential impacts on shallow groundwater in the BESS location are made in the Outline CEMP [EN010158/APP/7.2.3], to ensure that necessary mitigation measures relating to this issue are secured. Further details are provided in the response to RR-26 (Approach to Assessment), starting on page 90 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and in Outline Drainage Strategy [EN010158/APP/7.11.3].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
7.7	4.10.24	Comment that no significant sterilisation effects have been identified regarding mineral resources, and confirmation of this conclusion's suitability will depend on the results of the pre-construction ground investigation which must be incorporated into the final Mineral Safeguarding Assessment.	The Applicant has noted the requirement by Buckinghamshire Council that the findings of the intrusive ground investigation will be used to review the contents of the Mineral Safeguarding Assessment, which forms Appendix 2 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , and if necessary, the Mineral Safeguarding Assessment will be updated to present as a revised document. This is secured in Table 3.6 of the Outline CEMP [EN010158/APP/7.2.3] .
7.8	4.10.25	Comment that additional information is required to support the land and groundwater assessment, the Minerals Safeguarding Assessment and proposed mitigation measures.	The Applicant has discussed the approach to further ground investigations with Buckinghamshire Council and this has been agreed in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] submitted at Deadline 1. An intrusive ground investigation is secured within the Outline CEMP [EN010158/APP/7.2.3] and the scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, as appropriate). If this identifies any contamination that needs to be addressed, any subsequent monitoring and remediation will also be agreed with Buckinghamshire Council and the Environment Agency (as appropriate). This work will be completed prior to construction works commencing and the report will be issued to Buckinghamshire Council. This will provide further information relating to potential pollutant linkages that were identified by ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123]. Following the completion of the ground investigation works, the Mineral Safeguarding Assessment (which forms Appendix 2 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) would be updated, if required, and issued to Buckinghamshire Council.
Adequacy of the Proposed Mitigation Measures and How They Would Be Secured			
7.9	4.10.21	Comment that contamination risk as a result of the risk of a BESS fire and chemical release should be accounted for with clear mitigation measures in the OEMP. Further comment that this should include firewater containment, spill pathways, emergency response procedures, and management of hazardous substances.	The Applicant updated the management plans for Deadline 1. These elements are incorporated into the appropriate documents, as detailed below, with the key document that covers these issues being the Outline BSMP [EN010158/APP/7.9.3]: • Outline CEMP [EN010158/APP/7.2.3], as covered by a number of separate mitigations (see pages 53, 55, 59, 60, 61 and 69); • Outline OEMP [EN010158/APP/7.3.3], as covered by a number of separate mitigations (see pages 26-31, 33-36 and 39-40); • Outline DEMP [EN010158/APP/7.4.3], as covered by a number of separate mitigations (see pages 29, 33, 36-42 and 45-46); • Outline BSMP [EN010158/APP/7.9.3], as covered by a number of separate mitigations (see Section 6, specifically parts 6.6.7 and 6.6.8 on pages 28); • Outline Drainage Strategy [EN010158/APP/7.11.3], see Sections 6.1.4 (page 11), 6.5.2 (page 12) and 6.7 (page 13). For specific information relating to the mitigation measures, please refer to the responses to [RR-026] (Impacts from BESS, see page 88) and RR-081 (BESS drainage design, see page 137) from Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			The Outline BSMP [EN010158/APP/7.9.3] includes the following sections: • Clear mitigation measures in the event of BESS thermal runaway event. • Environmental protection measures to be maintained in the event of a BESS fire (including measures such as firewater containment and isolation through automatic and manual valves). • Separate containment around BESS infrastructure to ensure segregation of any contaminated fire water through to potential spill pathways • Providing details of on-site testing and disposal procedures for both firewater and the aggregate subbase which may be contaminated following a BESS fire. • The additional detail of maintenance and specific mitigation will be included in the detailed Battery Safety Management Plan once the battery system to be used on site is known. In addition, the Applicant has amended ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038] to ensure that there is specific mention of this issue in respect of the operational phase of the development (with the topic already being sufficiently covered within the decommissioning section).

Table 3-8: Landscape and Visual (including Design)

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Effects on Landscape Character
8.1	4.4.9 to 4.4.52	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), and the Vale of Aylesbury Local Plan (2013 – 2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.4.9 to 4.4.52 the Local Impact Report.
8.2	4.4.61 and 4.4.65	Comment noting the Landscape and Visual Impact Assessment (LVIA) methodology used is acceptable for this type of development. Buckinghamshire Council have concerns with regards to the classification of magnitude of effects for all receptors within the LVIA. Buckinghamshire Council would like to have the LVIA revisited to re-score the magnitude of effects where a receptor receives a moderate/minor score for significance of effect, where it is felt that the current professional judgement has a tendency to result in lower magnitude of effects ratings. Buckinghamshire Council would expect that any receptor whether low, medium or high sensitivity which receives either a moderate/minor or moderate magnitude of effect would therefore then be assessed as at least a moderate adverse and significant residual effect (with additional mitigation). They consider that this would be a more accurate and clearer approach of addressing the perceived effects and subsequent impacts on the receptors and rely more heavily on the methodology rather than professional judgement.	The Applicant welcomes the acceptability of the LVIA methodology to Buckinghamshire Council which includes clear description of how the magnitude of effect is assessed as set out in ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]; the same methodology has been used for the submission of the Springwell Solar DCO project, granted development consent by the Secretary of State in May 2026. The methodology has been developed in accordance with standard practice as set out in The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) and Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of GLVIA3, both produced by the Landscape Institute. The Applicant is confident that this methodology has been applied consistently and transparently in the judgement of magnitude of effect throughout the LVIA and therefore respectfully disagrees that the assessment should be revisited to re-score the magnitude of effects where receptors have been assessed as moderate/minor effect. In brief, and as set out in paragraphs 2.4.9-2.4.16 and 2.5.4-2.5.12 of the methodology, the magnitude of effect considers three factors (scale, geographical extent and duration). It is noted that for the assessment of each factor there are a number of quantifiable elements that are used to provide an overall evaluation. Therefore, whilst there is some degree of professional judgement in the assessment of these contributory factors, the assessment nevertheless clearly sets out how a judgement has been reached in each case. The Applicant therefore considers the assessment of magnitude to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment. The Applicant respectfully disagrees that the levels of magnitude and sensitivity should be combined as described by Buckinghamshire Council to result in a greater instance of significant effects. As the Applicant sets out in ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110], Table A10.3 provides a non-prescriptive tool for the judgement of overall landscape and visual effects as a result of combining the assessments of sensitivity and magnitude; the same table was used in the submission of the consented Springwell Solar DCO project. Again, the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology as described above with no requirement for reassessment.
8.3	4.4.62	Comment noting that Buckinghamshire Council believes that given the high/medium sensitivity of the landscape receptor, the introduction of the Proposed Development would not result in a moderate beneficial residual effect at year 10 of operation.	The Applicant respectfully disagrees that effects on landscape fabric would not result in moderate beneficial effects at year 10. As set out in paragraphs 10.10.285-10.10.291 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] the proposed new vegetation, which would include approximately 4.3km of hedgerow and 8.78ha of woodland, would result in significant planting gains and would make a positive contribution to the landscape fabric of the Site following 10 years of establishment.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
8.4	4.4.68	Comment noting that relocating the BESS to other areas within the Proposed Development is recommended. Fields D18 and D19 situated to the south, present a viable alternative as this positioning would increase the distance from the setting of Botolph Claydon and reduce visual impacts on nearby PRowWs. Another option is fields E10 and E11 to the north, which are closer to the existing substation. This location would allow the BESS to be grouped with an established infrastructure feature (and at least one further consented BESS).	The Applicant does not consider that this comment ought to carry weight in the overall planning balance. This is because, as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are “<i>vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State’s decision</i>”. Paragraph 4.3.28 of NPS EN-1 (2023) goes on to state that such alternatives should, wherever possible, be identified “<i>before an application is made to the Secretary of State</i>”. The location of the BESS in Fields D8 and D9 has followed a robust site selection process as set out in Section 5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. Paragraph 5.4.16 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] sets out that Fields D18 and D19 were removed from consideration for the BESS as part of the Stage 2 design process as a result of likely additional noise and landscape and visual effects based on further modelling and survey work. Whilst moving the BESS to Fields D18 and D19 would increase the separation distance to Botolph Claydon, it is noted that no likely significant effects have been reported in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] for visual receptors in the village. Furthermore, the relocation to Fields D18 and D19 would bring the BESS into greater proximity to the Quanton-Wing Hills Area of Attractive Landscape and the Hogshaw Farm and Wildlife Park visitor attraction which would have further adverse effects. Consideration of Fields E10 and E11 as a potential location for the BESS is provided in response to paragraphs 4.2.26 and 4.2.27 of the LIR in Table 4-2: Need, Site Selection and Alternatives of this response to the Council’s LIR.
	4.4.69	Comment notes that the scale and nature of the landscape change introduced by the Proposed Development would be unprecedented as there are no other developments of this nature within the immediate study area and it is therefore regarded as out of character in this rural landscape. Whilst mitigation measures have been incorporated there will still be significant adverse effects on landscape character and visual receptors.	ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] presents an assessment of effects on landscape character. 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 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. Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] 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. Moreover, these limited impacts are to be considered against the backdrop of national policy. Paragraph 5.10.5 of NPS EN-1 (2023) is clear in recognising that virtually all NSIPs will give rise to adverse effects on the landscape and this point is further contextualised to energy infrastructure through Paragraph 5.10.13 of NPS EN-1 (2023) which notes that all proposed “<i>energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>”. It is therefore the role of the Secretary of State to judge, under Paragraph 5.10.14 of NPS EN-1 (2023), whether the visual effects on sensitive receptors (e.g., local residents) and other receptors (e.g., visitors to the local area) outweigh the benefits of the Proposed Development. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the visual effects, together with those other effects identified through the Environmental Statement, do not outweigh the clear benefits of the Proposed Development and the planning balance is firmly in favour of approval.
			Effects on Visual Amenity

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
8.6	4.4.2	Comment noting concerns with the predicted impacts that would be experienced both on the landscape character and on visual receptors. Comment noting concern with the industrialising effect of the Proposed Development and the particular sensitivity upon a number of raised villages within the local landscapes undulating landform. Further comment noting that the BESS is located too close to landscape designations, including the Aylesbury Vale Area of Attractive Landscape, and is likely to be visible from nearby viewpoints.	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/6.2.2] 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. 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 Year 1 of operation for users of the North Buckinghamshire Way/Midshires Way and residents of 4-7 Catherine Cottages. As set out within Section 5.3-5.5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], local landform has influenced the design of the Proposed Development from the outset. 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 (Paragraph 5.3.7). Within Parcel 2, fields in the north (Fields D1 and D3 (North)) were removed from consideration for Solar PV development due to the topography and visual considerations, which included reducing visibility from Botolph Claydon (Paragraph 5.4.18). 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 summarised in Table 10.14 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2], none of the raised villages would experience significant visual effects as a result of the Proposed Development. The Applicant respectfully disagrees that the BESS is located too close to the wider Quainton-Wing Hills Area of Attractive Landscape. As set out on page 49 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] it is acknowledged that there would be some indirect effects on Quainton-Wing Hills Area of Attractive Landscape as a result of the BESS in Fields D8 and D9. However, due to their siting on lower lying fields of the Site at a distance of some 800m at their closest point to the Area of Attractive Landscape, such effects would be indirect and not significant. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] and the accompanying ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] identifies viewpoints 15, 16, 29-31, 33 and 41 from within the Area of Attractive Landscape and demonstrates that visibility of the BESS would generally be from more elevated and distant locations.
8.7	4.4.3	Comment noting that the area is recognised and protected for its rural character, and the introduction of large-scale infrastructure would create a significant industrialising effect. Buckinghamshire Council deems the use of Fields B28 and B29 for solar PV as unsuitable. In addition, the BESS should be relocated to a more appropriate site.	This is understood to be a request for the removal of Solar PV modules from Fields D28 and D29 due to the potential impacts on the Area of Attractive Landscape. The Applicant respectfully disagrees that Solar PV modules should be removed from Fields D28 and D29 to protect the wider landscape designation of the Quainton-Wing Hills Area of Attractive Landscape. Fields D28 and D29 are considered appropriate for solar PV development due to the visual enclosure created by their topography and surrounding mature woodland, which largely separate them from the wider and more visually open parts of the Area of Attractive Landscape within the Order Limits. As a result, whilst there would be likely significant effects on landscape character to Fields D28 and D29, this would be a localised effect and would not extend to the wider Quainton-Wing Hills Area of Attractive Landscape. As noted in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			and the accompanying ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] viewpoints 15, 16, 29-31, 33 and 41 demonstrate the localised nature of views of the Proposed Development within Fields D28 and D29. As set out in the response to paragraph 4.4.2 of the LIR above, the Applicant respectfully disagrees that unacceptable impacts would be experienced as a result of the proximity of the BESS to the Quainton-Wing Hills Area of Attractive Landscape. As set out in the response to paragraph 4.4.68 of the LIR above, the Applicant respectfully disagrees that relocating the BESS would result in overall reduced impacts.
8.8	4.4.7	Comment noting that the proposed location of BESS in Fields D8 and D9 places it in close proximity to several PRowWs including the Bernwood Jubilee Way which is a designated Long-Distance Path as well as the village of Botolph Claydon. The proposed mitigation whilst trying to reduce the perceived visual impacts would introduce elements that would be out of character. The Bernwood Jubilee Way (ECL/8/1) although being further away from the BESS location runs in part at a higher elevation and would therefore have views into the BESS Compound. The proposed mitigation measures would have a reduced effect from this elevated vantage point.	As set out in the response to paragraph 4.4.61 of the LIR above, the Applicant respectfully disagrees that relocating the BESS would result in overall reduced impacts. Whilst the Applicant acknowledges in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] that significant adverse visual effects are likely to occur for the duration of operation for users of PRowWs between Botolph Claydon and Runts Wood, including Bernwood Jubilee Way, the Applicant respectfully disagrees that mitigation measures would be uncharacteristic. The taller elements of the Proposed Development, which include the noise barrier and BESS, are located in low lying areas of the Order Limits with proposed mitigation hedgerow planting to minimise and soften views. The solar PV development and BESS have been set back from the Bernwood Jubilee Way, given its elevated position, to allow views to continue over the top of the built elements of the Proposed Development, as described in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018].
8.9	4.4.63	Comment noting that the LVIA has assessed the cumulative impacts on landscape character as not being significant as a consequence of: Landscape containment, Local topography and Woodland blocks. It is the opinion of Buckinghamshire Council that the introduction of the Proposed Development would result in significant adverse impacts on the landscape character as it would introduce large built elements that are out of character within the rural landscape and that the local landform, woodland blocks and topography does not offer substantial features to mitigate the predicted adverse effects even when additional mitigation has been incorporated.	As the Applicant set out in Table 2 of ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3], the LVIA has concluded that there is potential for an increase in significant landscape effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill for the duration of operation. There would also be increased combined effects on landscape character, albeit with no change to overall significance, as follows: • Landscape Character Area 5.6: Claydon Valley – minor adverse (not significant) <i>solus</i> effects, increased to moderate adverse (not significant) for combined effects; • Landscape Character Area 5.7: Hogshaw Claylands – moderate adverse (significant) <i>solus</i> effects, increased to major/moderate adverse (significant) for combined effects; and • Quainton-Wing Hills Area of Attractive Landscape – moderate/minor adverse (not significant) <i>solus</i> effects, increased to moderate adverse (not significant) for combined effects. As set out in para. 4.1.154 in ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3] these effects would extend no more than 2km beyond the Order Limits which would not be atypical considering the scale of the Proposed Development.
		The Adequacy of Landscape and Visual Mitigation	
8.10	4.4.4	Comment noting that Buckinghamshire Council is concerned with the interaction between the PRowWs and the Proposed Development. Further comment	The Applicant respectfully disagrees that wider sensory effects, such as noise, have not been considered in the assessment of effects on users of PRowW. It is noted that no noise effects are identified as being significant within ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] and it is therefore

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		that Buckinghamshire Council is not satisfied that these potential impacts, such as noise etc., have been fully or accurately assessed and ultimately fails to protect and enhance the PRoWs as required by NPPF paragraph 105.	considered that any such non-significant effects would not add further to the judgement of effects afforded to users of PRoW. The Applicant therefore maintains that such 'sensory impacts' have been considered in the assessment of effects on PRoW users. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise due to the operation of the Proposed Development, relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse noise effects would not be expected. With regard for Paragraph 105 of the NPPF, the Applicant confirms, through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] that the Proposed Development is compliant with this policy.
8.11	4.4.5	Comment noting that the proposed mitigation measures are too generic and too limited in scale to meaningfully reduce the identified harms.	The Applicant respectfully disagrees that mitigation measures are generic and limited in scale. As set out in response to paragraph 4.4.2 of the LIR above the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], provides evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors throughout the process of design development. The proposed design response includes discounting Solar PV development from specific fields within the Order Limits as set out within Section 5.3-5.5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. As well as the standard offsets described at paragraph 5.4.4, bespoke offsets, as secured by the Design Commitments [EN010158/APP/5.9.4] are described as: • Bernwood Jubilee Way would have a 55m offset 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 in Field E23 and permissive route in Field D28 would have a larger offset of 30m from the proposed Solar PV development to allow greater separation from the Proposed Development. • 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. • The BESS and acoustic screen are offset at least 50m from the PRoW in Field D9. • Woodland planting within Parcel 1 will respect the 'designed' character of the woodland blocks to the wider historic landscape of Claydon House. In addition, bespoke offsets have been provided for each individual property reviewed as shown in ES Volume 3, Figure 10.13: Residential Property Location Plan [EN010158/APP/6.3.2] [AS-031]. The assessment in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] acknowledges that not all such effects can be fully mitigated and a number of significant adverse landscape and visual effects would remain, as is typical of the scale of development that is proposed; such effects will be weighed in the planning balance. Requirements 4 and 7 of the Draft DCO [EN010158/APP/3.1.4] require the detailed design of the mitigation measures and the detailed Landscape and Ecological Management Plan to be submitted to Buckinghamshire Council for approval. This ensures that Buckinghamshire Council are able to input to the final design of mitigation measures as the design is finalised.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
8.12	4.4.5	Comment noting that there is clear potential to soften the visual and landscape effects of the Proposed Development through more substantial interventions, such as additional hedgerow planting and the use of strategically positioned tree belts that take advantage of the site's natural undulating topography.	As set out in the Outline LEMP [EN010158/APP/7.6.3] the Applicant has provided for extensive new hedgerow and structural woodland planting within the Order Limits to provide appropriate mitigation for the Proposed Development, in direct response to specific guidelines in the Aylesbury Vale Landscape Character Assessment and based on robust baseline surveys and consultations with relevant consultation bodies.
8.13	4.4.6	Comment noting that some of the proposed mitigation elements, such as installation of a 3.5-5m high timber noise attenuation fence, would worsen the landscape and visual impacts with it appearing incongruous within a rural setting and forming a visually prominent feature.	The design of the acoustic barriers, which may not be close-boarded acoustic fencing, will be finalised during the detailed design stage once the noise levels of the final equipment choices are known. As set out in [RR-026] Noise and vibration impacts of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], there are various material options that can be adopted for the acoustic barriers. The specification of any acoustic mitigation scheme would be provided prior to operation and is secured by a requirement of the Outline OEMP [EN010158/APP/7.3.3], (Section 2.8). As set out on page 54 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the impact of the proposed noise barriers has been considered in its location in a low lying area of the Order Limits together with proposed mitigation hedgerow planting. The assessment of landscape and visual effects presented in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] takes into account the location of noise barriers and reports the likely significant effects.
8.14	4.4.8	Comment noting that the BESS should be relocated to other fields within the Proposed Development, such as Fields D18 and D19 which are located in close proximity to the south. This would have the benefit of positioning the BESS further away from the setting of Botolph Claydon; visual impacts on the associated PRowWs would still be present albeit at a reduced level as a consequence of the undulating landform.	As set out in the response to paragraph 4.4.68 of the LIR above, ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] explain the reasons why the proposed BESS has been located in Fields D8 and D9.
8.15	4.4.8	Comment noting that another alternative location for the BESS would be Fields E10 and E11; these are situated further to the north and would place BESS in closer proximity to the existing substation. Further comment that this would have the benefit of grouping a proposed major infrastructure element together with an established feature (and at least one further consented BESS). This would have the benefit of positioning the BESS further away from the setting of Botolph Claydon; visual impacts on the associated PRowWs would still be present albeit at a reduced level as a consequence of the undulating landform.	The Applicant does not consider that this comment ought to carry weight in the overall planning balance. This is because, as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are “<i>vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State’s decision</i>”. Paragraph 4.3.28 of NPS EN-1 (2023) goes on to state that such alternatives should, wherever possible, be identified “<i>before an application is made to the Secretary of State</i>”. Detailed consideration of Fields E10 and E11 as a potential location for the BESS is provided in response to paragraphs 4.2.26 and 4.2.27 of the LIR in Table 4-2: Need, Site Selection and Alternatives of this response to the Council’s LIR. As confirmed in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], Fields E10 and E11 were discounted for BESS development due to the presence of higher flood risk and offsetting requirements from overhead lines and pylons which transect the Fields. For Field E11, the proximity of Sion Hill Farm and associated noise and visual impacts weighed on the design decision to remove BESS development from this field.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Locating the BESS within Fields E10 and E11 has the potential to cause significant adverse noise effects at Sion Hill Farm during the operation (including maintenance) phase of the Proposed Development. This would be a function of the reduced separation distance to the farm, the increase in noise emitting infrastructure within Parcel 3 and the inter-project cumulative effects with other developments in the vicinity of Parcel 3. As is noted in National Grid Electricity Transmission (NGET) Limited's Written Representation [REP1-130] and response to Examining Authority's Requests for Information [AS-037], NGET requires an easement of 30m either side of a tower, its base and the overhead lines that run between them. This gives rise to a 60m easement in diameter from NGET's assets and this significantly reduces the capacity of Fields E10 and E11 to facilitate BESS development since such easements fragment the Fields. These Fields' capacity for BESS development is further challenged by the fact that the Applicant does not know the alignment of the tower(s) and overhead lines that NGET are proposing as part of the East Claydon Project. In terms of flood risk, Annex 1: Proposed Development's spatial overlap with Flood Zone areas and Annex 2: Proposed Development's spatial overlap with Surface Water Flood Risk areas to Appendix 5 - Sequential and Exception Tests of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] spatially demonstrate the extent to which there is overlap between the operational elements of the Proposed Development and Flood Zone and Surface Water risk areas. This demonstrates the flood risk constraint on Field E10 and along the south eastern side of Field E11. For Field E10, the area outside the flood risk constraint would be largely impacted by the pylon easements referred to above. The scenario for BESS in Fields E10 and E11 has not been assessed in the RVAA for Sion Hill Farm. However, it is not considered that likely significant effects would vary from those as already reported in ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114], hence there would be no benefit to its occupants. In terms of mitigation of visual impacts, following Phase Two Consultation the allocation of Fields E11 and E20 was prioritised for the location of the Rosefield Substation away from Fields E21-E23 in order to reduce visual impacts on users of the North Buckinghamshire Way/Midshires Way, local PRoW and residents of Botolph Claydon.
8.16	4.4.58	Comment noting that Buckinghamshire Council do not consider the landscape impacts of the Proposed Development to be justified on their own terms. The Applicant must fully address these concerns alongside the adequacy of the proposed mitigation by referring explicitly to the Landscape Character Assessment and the report Defining the Special Qualities of Local Landscape Designations in the Aylesbury Vale District (2016).	As stated in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], consideration of the Landscape Character Assessment and AAL has been an important consideration in the design of the Proposed Development. Project Principle 6.1 notes that proposals draw from existing characteristics, informed by relevant local studies such as the Aylesbury Vale Landscape Character Assessment, whilst Project Principle 6.2 specifically refers to respecting the Special Qualities of the AAL designation. The Applicant maintains that the relevant extracts of both landscape character studies have therefore been referenced in order to consider the design and mitigation of the Proposed Development. As concluded in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] the Applicant acknowledges that likely significant effects on landscape character would remain for the duration of the operation (including maintenance) phase within defined parts of Landscape Character Area 5.7: Hogshaw Claylands; Landscape Character Area 7.3: Claydon Bowl; and Landscape Character Area 9.1: Finemere Hill. Sections 9.19 and 9.26 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] review the Proposed Development in the context of planning policies relating to landscape and visual matters. These sections conclude that the Proposed Development is considered to be compliant with the relevant landscape and visual planning policies. Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] 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

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
8.17			adverse impacts, inclusive of the landscape and visual impacts, which (as the Environmental Statement sets out) are limited. Such effects will be weighed in the planning balance.
	4.4.64	Comment noting that given the size and scale of the Proposed Development, Buckinghamshire Council do not agree with the degree of professional judgement that has been used in compiling the magnitude of the impacts and therefore the subsequent significance of effects that have been identified. Buckinghamshire Council does not agree with the conclusions set out in the LVIA that there would not be significant adverse visual impacts on visual receptors. It is therefore recommended that all receptors which have a moderate magnitude of effect would receive at least a moderate adverse and significant residual effect (with additional mitigation).	As set out in the response to paragraph 4.4.61 of the LIR above, the Applicant welcomes the acceptability of the LVIA methodology by Buckinghamshire Council which includes clear description of how the magnitude of effect is assessed as set out in ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]. The methodology has been developed in accordance with standard practice as set out in The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) and Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of GLVIA3, both produced by the Landscape Institute. The Applicant is confident that this methodology has been applied consistently and transparently in the judgement of magnitude of effect throughout the LVIA and therefore respectfully disagrees that the assessment should be revisited to <i>'rely more heavily on the methodology rather than professional judgement.'</i>
	Cumulative Effects		
8.18	4.4.73	Comment noting that cumulative landscape and visual impacts must be considered both kinetically and sequentially, recognising the scale of change occurring across the district. This requires an appreciation of how multiple projects collectively generate significant adverse effects.	As set out in Reference [RR-026] Cumulative effects of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant has assessed the inter-project cumulative effects, including sequential (kinetic) effects, with other relevant developments. As presented in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] and ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3], cumulative effects have been considered in terms of the additional effects of the Proposed Development and also the combined effects of all cumulative schemes together. The Applicant therefore considers that a worst-case, maximum combined cumulative effect has been considered, which would extend significant effects to approximately 2km beyond the Order Limits southeast of Parcel 2 to within LCA 9.2: Quainton Hill. The Applicant therefore respectfully disagrees that unacceptable impacts would be experienced generally across the district and maintains that the potential cumulative impacts are not atypical considering the scale of the Proposed Development.
8.19	4.4.74	Comment notes that Buckinghamshire Council maintains that when viewed alongside neighbouring applications, the Proposed Development would create an unacceptable cumulative landscape character impacts across the district.	As set out in the response to paragraph 4.4.73 of the LIR above, the Applicant has assessed only one instance where residual significant cumulative effects would be extended across the wider district.

Table 3-9: Noise and Vibration

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Receptors during Construction and Operation			
9.1	4.8.1	Comment that there are some moderate adverse effects in respect of PRowS and dwellings. Further comment that more steps to mitigate these effects should be taken so that they are avoided.	Based on the assessment framework adopted in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040], there are no moderate adverse effects predicted for dwellings, post-mitigation. The magnitude criteria considers both the rating level relative to background sound level as well as the lowest observed adverse effect level, with the least onerous of the two being used to inform the significance outcome (Note 4 of Table 13.10 refers to this). The predicted rating noise levels associated with the operation (including maintenance) phase of the Proposed Development are not predicted to exceed 35 dB L_{Ar,Tr} at any residential receptors within the defined Study Area. Regarding PRowS, ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] provides a qualitative assessment of construction phase noise levels which concluded no significant adverse effects. During the operation (including maintenance) phase, noise from equipment installations associated with the Proposed Development would be heavily mitigated, including use of low-noise units and perimeter barriers. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and PRowS network. PRowS are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRowS network would be limited and therefore significant adverse effects would not be expected.
9.2	4.8.29	Comment noting noise emitting equipment and the possibility for persistent noise with further comment stating the need for compliance with thresholds set out in BS 4142:2014+A1:2019 and Planning Practice Guidance during the operation (including maintenance) phase.	Please refer to the response to paragraph 4.8.30 of the LIR below, on the basis that these paragraphs are linked.
9.3	4.8.30	Comment recognising that background noise levels are low due to the rural locality which increases the likelihood of significant noise effects being identified.	The significance criteria adopted for the operation (including maintenance) phase assessment accounts for the low background sound levels within the Study Area. On the basis that the Proposed Development has the potential to operate on a 24-hour basis, an external rating level of 35 dB L _{Ar,Tr} , inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period, whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. There may be a slight effect to the acoustic character of the area but not such that there is a change in the quality of life.
9.4	4.8.32	Comment recognising the compliance of the submitted noise assessments and their conclusions, in accordance with recognised standards (such as BS 5228 for construction noise and BS 4142 for operational impacts). Further comment noting concerns regarding impact of noise on livestock and other animals that have not been addressed. Buckinghamshire Council	Agreement with the assessment presented in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] is acknowledged. Regarding potential impacts for livestock, a range of mitigation measures have been introduced to reduce noise levels experienced by livestock in surrounding fields. Further commitments have been introduced within Section 2.9 of the Outline CEMP [EN010158/APP/7.2.3], as noted below: <i>"Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. In</i>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		consider that this may need to be addressed if the ExA deems it an important matter.	<i>addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable."</i> In addition, the following statement is included with Section 2.10 of the Outline CEMP [EN010158/APP/7.2.3] to mitigate any impacts to livestock: <i>"Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced to reduce the construction induced noise levels experienced by livestock, where appropriate."</i> Livestock Noise and Vibration Technical Study [EN010158/APP/8.15] which provides further detail on the potential for noise impacts to livestock and associated mitigation measures has been submitted at Deadline 2.
9.5	4.8.32	Comment noting that the noise assessments demonstrate that, with the recommended controls in place, noise emissions will in general remain within acceptable limits and are unlikely to result in significant adverse effects on nearby sensitive receptors.	Comment acknowledged.
9.6	4.8.33	Comment noting that the Applicant has not explicitly acknowledged or addressed the impact of noise on a worst-case scenario basis for the PRoWs at this stage.	ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] provides a qualitative assessment of construction phase noise levels on the PRoW, which concluded no significant adverse effects. During the operational phase, noise from the Proposed Development would be significantly lower than that generated during construction and the proposed sources of noise would be heavily mitigated, including the use of low-noise units and perimeter barriers. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and PRoW network. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse effects are not expected.
9.7	4.8.34	Comment stating that the model for how noise impacts residential receptors underestimates real-world intrusiveness.	The significance criteria adopted for the operation (including maintenance) phase assessment accounts for the low background sound levels. Taking into account the context in which sound occurs is an important part of a British Standard 4142:2014+A1:2019 assessment. One factor stated is that the absolute level of sound can be as, or more, important than relative outcomes where background and rating levels are low. This reflects the baseline environment at noise-sensitive receptors surrounding the Proposed Development. British Standard 4142:2014+A1:2019 does not define 'low' in the context of background sound levels nor rating levels. However, the Association of Noise Consultants suggest that background levels of less than about 30 dB LA90 and rating levels of less than about 35 dB LA_{r,Tr} would be a reasonable indication. The background level stated reflects the conditions observed and measured in the baseline environment within the Study Area, particularly at night. On this basis, an external rating level of 35 dB LA_{r,Tr}, inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period, whereby noise can be heard,

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
9.8	4.8.35	Comment recognising the importance of Paragraph 4.8.34 of the LIR especially given the 6dB exceedance calculated at Bernwood Farm R2 and Hogshaw Farm R12. Further comment noting the impact/effect has not been explicitly acknowledged or addressed by the Applicant at this stage.	but does not cause any change in behaviour, attitude or other physiological response. There may be a slight effect to the acoustic character of the area but not such that there is a change in the quality of life.
			The predicted rating noise levels at Bernwood Farm and Hogshaw Farm fall below the lowest observed adverse effect level threshold criteria, as defined within the assessment framework adopted in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] . As a result, there are no moderate adverse effects predicted, post mitigation.
			The magnitude criteria considers both the rating level relative to background sound level as well as the lowest observed adverse effect level, with the least onerous of the two being used to inform the significance outcome. The predicted rating noise levels associated with the operation (including maintenance) phase of the Proposed Development are not predicted to exceed 35 dB LA,T at the two receptors.
			The Adequacy of Mitigation
9.9	4.8.2	Comment noting that some consideration of further mitigation may be required in light of the remaining significant effects in EIA terms. Further comment that some of the mitigations for noise may have a detrimental effect in respect of other matters considered in the LIR.	Based on the assessment framework adopted in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] , there are no significant adverse effects predicted, post mitigation. Notwithstanding this, acoustic mitigation strategy would be refined as part of the detailed design stage.
			The assessment of landscape and visual effects presented in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] takes into account the location of noise barriers and reports the likely significant effects.
9.10	4.8.28	Comment about the noise mitigation proposed for the construction phase, stating the need for compliance with BS5228 standards for construction noise and the need for robust mitigation.	A range of mitigation measures have been proposed within ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] and the Outline CEMP [EN010158/APP/7.2.3] to address the potential for significant adverse effects during the construction phase, at a limited number of receptors. These mitigation measures are provided to ensure compliance with the BS 5228 criteria and are secured as part of the DCO. The specific mitigation strategy would be refined once a contractor is appointed and the construction methodology is developed.
			Noise thresholds have been identified for nearby receptors during construction and presented in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] and the applicable noise thresholds will be defined in each of the detailed Construction Environmental Management Plan(s). Compliance with these noise levels will ensure that adverse effects are unlikely. Abnormal or emergency construction traffic movements may occur outside of normal working hours. In the event of these occurrences, specific noise mitigation measure will be put in place to reduce potential noise impacts at nearby noise sensitive receptors as set out in Outline CEMP [EN010158/APP/7.2.3] . Further proposed construction noise mitigation measures are set out within Table 3.8 of the Outline CEMP [EN010158/APP/7.2.3] .
9.11	4.8.31	Comment noting that the lack of noise effects in excess of the SOAEL LOAEL appropriately minimises other adverse impacts on health and quality of life from noise.	It is agreed that the post-mitigation noise levels do not exceed the lowest observed adverse effect level threshold criteria and therefore potential adverse effects are not predicted.

Table 3-10: Population

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Businesses, Including Agricultural Businesses			
10.1	4.6.20 and 4.6.1	Comment that Buckinghamshire Council is not yet able to confirm if the approach to assessment satisfies the expectations in the National Policy Statements NPS EN-1 (2023) and NPS EN-3 (2023), or other effects in line with ISEP guidance on scoping and assessing significance of health effects, since the Environmental Statement does not set out a clear or integrated assessment of likely significant effects on population and human health.	The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4 - Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, which aims to more clearly present the effects on health and wellbeing in accordance with NPS EN-1, NPS EN-3 and guidance produced by ISEP. A further iteration of the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1-127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change. The Applicant recognises that Buckinghamshire Council will wish to review this report and comment at subsequent deadlines, though will also be seeking to engage bilaterally on the matter.
10.2	4.13.1	Comment noting that despite the benefits listed in the Outline ESSCP, the rural location of the Site, reliance on commercial contractor decisions, and limited public transport access means residents may struggle to fully benefit from job opportunities. Further comment noting that whilst some benefits may arise, their scale, sustainability and local retention are limited, with most gains occurring only during the 30-month construction phase.	ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] provides a reasonable estimate of the scale and location of net additional employment – applying average workforce mobility assumptions from industry surveys, and standard additionality assumptions (displacement, leakage). It is acknowledged that the rural location of the Site, and the mobility and peripatetic nature of the construction workforce in the UK, means that the location of the construction workforce and supply chain cannot be fully known at this stage – as such it is estimated that of the gross, peak construction workforce (600 FTE jobs), around 180 FTE jobs are likely to be drawn from within the CLMA Focus Area (see ES Volume 3, Figure 14.3: CLMA Focus Area [EN010158/APP/6.3] [APP-073]). This area 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 (which must be in accordance with the Outline Employment, Skills and Supply Chain Plan (Outline ESSCP) [EN010158/APP/7.14.3]) and therefore would be able to work with the Applicant to direct measures to be secured within the detailed Employment, Skills and Supply Chain Plan to the primary benefit of its residents and businesses. The Outline ESSCP [EN010158/APP/7.14.3] states that the Applicant and Buckinghamshire Council could agree geographical targeting parameters for proactive recruitment drives and skills delivery and sets out an optional targeting hierarchy for consideration. The main contractors would be contractually obliged to support the delivery of the detailed Employment, Skills and Supply Chain Plan and the underpinning principle to deliver as many economic benefits as possible to local communities and businesses. It is correct that the scale of benefit is greater in the construction phase, although it represents a shorter-term effect than during the operational phase (where fewer jobs are supported, over a longer period). However, the Applicant notes that the measures within the Outline ESSCP [EN010158/APP/7.14.3] should not be seen in isolation to the Proposed Development, and that they are “<i>Set within the broader infrastructure development context, the Proposed Development could promote opportunities to gain skills in civil engineering,</i>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			green energy and modern construction that would benefit the development of energy and other infrastructure right across Buckinghamshire" (paragraph 2.1.5). Paragraph 1.1.4 of the Outline ESSCP [EN010158/APP/7.14.3] confirms the Applicant's commitment to collaborating with other developers to promote workforce development and transfer. Thus, the Applicant envisages this collaboration extending to transferring the construction workforce across construction projects, creating sustainable pathways into work beyond the Site and extending employment benefits beyond the limits of its construction phase. Connecting into the Bucks Business First Construction Sector Employer Group would be key to establishing relationships with other developers to enable workforce transfer.
10.3	4.13.2	Comment raising concerns for the rural economy (including agriculture, tourism and established local businesses). Specific concern relates to: a) The loss of associated employment, and questions around the adequacy and implications of land swaps; b) Concerns from three specific businesses about animal welfare, biosecurity, visual impact, and construction-related disruption; and c) That mitigation applied for landscape and visual effects on two tourist-sector businesses does not mitigate significant adverse effects or therefore sufficiently address visitor-access issues, business viability risks or wider visitor-economy impacts. Further comment concluding that, in the context of the rural economy already being under pressure from declining agricultural employment and competing land-use demands, the Proposed Development is likely to exert material negative effects on nearby businesses, agricultural operations and tourism unless stronger mitigation and long-term support mechanisms are secured.	a) Employment and the Adequacy of Land Swaps The Applicant has undertaken an assessment of the scale of indicative land use and employment capacity change in the agricultural economy, effects on agricultural and non-agricultural businesses, and a review of effects on the tourist economy, as required by NPS EN-1, within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]. With regard to the adequacy and implications of land swaps, the Applicant has provided an appropriate level of information about compensation, mitigation and land-swaps in within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] without disclosing confidential and commercially sensitive information about Interested Parties. A note on the approach to minimising private loss was submitted at Deadline 1 in Appendix 1 to the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]. b) Concerns from Three Specific Businesses (Prestons' Farms / TCS Biosciences Ltd, Hogshaw Farm and Wildlife Park and Claydon House) 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, animal welfare and biosecurity and accessibility effects perceived by this business. During the pre-application phase, the Applicant took advice from concerned non-agricultural businesses, and amended the Proposed Development's design 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 Ltd, based on this organisation's feedback the Applicant has made several changes including but not limited to: • Removed the option consulted on previously for Rosefield Substation and/or BESS to be included on Field 23 (which will now be a field of Solar PV modules), thereby reducing perceived operational noise effects; and • Confirmed in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] that at the detailed design stage, the Solar PV module arrangement for Field E23 will be designed to incorporate movement corridors for Preston Farm's and/or TCS Biosciences Ltd's sheep and/or horses to cross the field to access their other adjacent grazing fields. Full details of such changes are set out in Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107] and the Consultation Report [EN010158/APP/5.1] [APP-020].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			With regard to the impact from noise of the major infrastructure involved, the Design Commitments [EN010158/APP/5.9.4] sets out the use of acoustic barriers to ensure that unacceptable noise impacts do not arise. The Applicant has taken into account considerations of animal welfare and biosecurity both in the iterative development and design of the Proposed Development, and in the approach to adaptive, flexible and best-practice mitigation, see Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm of the Applicant's Response to Written Representations [EN010158/APP/8.12] for more detail. The Applicant has detailed a range of measures to ensure animals are not adversely affected by the Proposed Development. At Deadline 1, the Applicant amended design commitment G2 of the Design Commitments [EN010158/APP/5.9.4] to specifically require the design of corridors through the Solar PV development in Field E23 to be undertaken in consultation with the tenants and the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point. As indicated in the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107], the Applicant has updated the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd [REP1-133] has been submitted by the Applicant at Deadline 2 (Note in Response to Preston Farms Ltd and TCS Bioscience Ltd Written Representations) to provide a clear, single document setting out the detail of the Applicant's position regarding the effects on and mitigation for these commercial operations. This includes an appended technical note (Appendix 1 - Noise and Vibration Technical Note) has also been submitted at Deadline 2 to provide further information regarding the effects of noise and vibration on livestock (cattle and sheep) and horses, and set out how guidance (including from the British Horse Society) has been used to further develop the approach to monitoring, mitigation and engagement secured within construction and operational management plans. Further engagement with affected businesses is on-going, and the Applicant is working to address the proposed additional measures for management of environmental effects raised through Written Representations submitted by Preston Farms and TCS Biosciences Ltd [REP1-133]. The Applicant recognises that there are residual significant adverse landscape and visual effects on two identified tourist-sector receptor businesses (Claydon House and Hogshaw Farm and Wildlife Park) – however it is noted that mitigation is in place to address these effects and reduce their significance as far as reasonably practicable. It is not considered that these residual effects would affect the viability of the businesses concerned given their diverse attraction and business models. In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting to the eastern edge of Parcel 2, in the form of new tree belts and hedgerows established to 3.5m, would provide some additional screening and filtering of views to the lower levels of the Proposed Development. Embedded mitigation also includes a 15m-width belt of structural native woodland (early) planting along southern boundary of Fields D8, D9, D19 and D26. ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] confirms that there are no significant residual effects anticipated on traffic and transport receptors which would have the potential to contribute towards 'visitor-

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			access' issues raised by the Council – mitigation secured in the Outline CTMP [EN010158/APP/7.5.3] will ensure that any effects during construction are monitored and managed effectively and measures communicated to stakeholders and the community to avoid the likelihood of actual or perceived changes in accessibility to tourist facilities. For Claydon House, engagement has been undertaken with the National Trust, as set out in Table 10.1 within ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] with amendments to the approach to design and siting of infrastructure resulting, e.g.: • A more designed approach has been applied to planting within Parcel 1 visible from Claydon House RPG. • The Satellite Collector Compound siting zone has been refined to minimise visibility from Claydon House and its cladding will reference local vernacular. In response to stakeholder feedback from Phase Two Consultation, areas of proposed Solar PV modules have been removed from Fields B9 and B11, the siting zone for the Collector Compound in Field B23 has been reduced, and reinforcement of the existing tree belt and hedgerow along Three Points Lane has been included to reduce visibility of the Proposed Development from Claydon House. The creation of new permissive paths including a permissive path to Knowl Hill, with interpretation measures for Claydon House and Claydon Park and Garden, will mitigate effects (and potentially provide enhancement) relating to tourism and community access.
10.4	4.13.18	Comment noting that the Economy, Investment and Regeneration Service (EIR) provided comment on the Outline ESSCP and that the EIR Service comments highlighted concerns over the extent to which investment and potential economic benefits arising from the Proposed Development would be felt by residents. Further comment on the potential impact on existing businesses in the vicinity of the proposed development and tourism, in the context of Paragraph 5.13.9 NPS EN-1 (2023).	Please refer to response to comments raised in paragraph 4.13.1 (above) regarding the extent to which local benefits (employment and skills) would accrue locally within Buckinghamshire in the context of the measures of the Outline ESSCP [EN010158/APP/7.14.3]. Paragraph 5.13.9 of NPS EN-1 (2024) sets out that “<i>The Secretary of State should have regard to the potential socio economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision</i>”. The Applicant has provided a compliant assessment of the potential socio-economic effects of the Proposed Development, in accordance with the scope of the assessment, and in consideration of scoping opinion and feedback through engagement and consultation with Buckinghamshire Council and other stakeholders, set out in ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4] [APP-081]. The assessment provided in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] draws on standard industry guidance for the scoping, methodology, significance assessment and receptor identification for socio-economic effects, and is in accordance with the ‘applicant assessment’ section of EN-1 (paragraphs 5.13.2 to 5.13.7).
10.5	4.13.19	Comment that Buckinghamshire Council consider the harms to local businesses and the economy as being a factor against the grant of the Proposed Development. They recognise steps are being taken in mitigation but state that further mitigation steps should be explored where possible, in line with policy (Paragraph 5.13.8 of NPS EN-1 (2023)).	Paragraph 5.13.8 of NPS EN-1 states that “<i>The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.</i>” The Applicant has taken steps to transparently assess and consider the need for embedded, iteratively designed mitigation and additional mitigation that is adaptive and driven by engagement with particularly sensitive businesses.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Where businesses are directly affected, the Claydon Estate is negotiating Heads of Terms for land swaps to provide for replacement land of at least the same quality and accessibility to support the viability of businesses. While the Applicant acknowledges that in some cases, there may be residual adverse effects on some affected businesses, the scale of harm has been reduced where practicable and managed through embedded mitigation and flexible, responsive and in some cases bespoke measures secured by management plans.
10.6	4.13.20	Comment highlighting that while the activities proposed in the Outline ESSCP are welcomed, the extent to which the economic benefits will be felt locally remains difficult to estimate and ensure. Further comment noting that the Applicant acknowledges this too.	Please refer to response to comments raised in paragraph 4.13.1 of the LIR (above). Acknowledging that the extent to which the economic benefits will be felt locally remains difficult to estimate and ensure, the Applicant notes that the scale and confidence in the retention of these benefits will become more concrete in the collaboration between the Applicant and Buckinghamshire Council leading up to the adoption of the detailed Employment, Skills and Supply Chain Plan. The content of the detailed Employment, Skills and Supply Chain Plan would be a more detailed articulation of the principles and suggested actions set out in the Outline ESSCP [EN010158/APP/7.14.3]. The detailed Employment, Skills and Supply Chain Plan would be approved by Buckinghamshire Council as a requirement of the DCO prior to commencement of construction. It would include a finer grained articulation of how the delivery framework would interconnect with existing education, training and business support infrastructure, which the Applicant acknowledges to be key to optimising local benefits.
10.7	4.13.21	Comment on discussions about Jobcentre Plus support, with the recommendation that the Applicant should fund and arrange transport options to overcome the Proposed Development's locational barrier to residents in accessing economic opportunities.	Paragraph 3.1.5 of the Outline ESSCP [EN010158/APP/7.14.3] sets out the Applicant's commitment to contribute an Education and Skills Fund in the sum of £50,000, to be made available, annually, from the date of commencement until the date of decommissioning, to support the priorities set out in the detailed Employment, Skills and Supply Chain Plan. Arrangements for allocating the Fund would be agreed by the Applicant and Buckinghamshire Council. There is potential for this Fund – or a part of it – to be used in the same way as the Jobcentre Plus Flexible Support Fund, to support job seekers who are not engaged with Jobcentre Plus, but are located in the most deprived communities and lack access to transport or face other barriers to accessing and sustaining work. Additionally, as mentioned in the Outline CTMP [EN010158/APP/7.5.3], Section 4.10 a Staff Travel Plan will include • Provision of public transport information to access where staff will be resident so there is no need for non-local staff to bring cars to the wider area; • Staff bus service for transport of Site staff from Bicester and Aylesbury, with pick ups from the mainline rail stations, accommodation/hotel areas and park and ride sites. • Promotion of a car sharing scheme; and • Car parking management. The detailed Employment, Skills and Supply Chain Plan would describe how the Applicant would work in concert with other public, private and voluntary and community sector organisations, to harness collective knowledge, skills, expertise and financial resources to support those furthest from the labour market into work.
10.8	4.13.22	Comment on the potential for the recruitment of local people and businesses, with the suggestion that the	Please refer to the Applicant's response to comments raised in paragraph 4.13.1 (above) regarding contractual commitments that will be conferred upon contractors to support the delivery of the detailed Employment, Skills

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		Applicant should consider how contractors can be mandated to provide employment, skills, and procurement opportunities locally, and whether quantifiable targets need to be included.	and Supply Chain Plan. This would include geographical targeting agreed by the Applicant and Buckinghamshire Council. The detailed Employment, Skills and Supply Chain Plan will be underpinned by the principles of the Construction Industry Training Board's National Skills Academy for Construction (NSAFC). The NSAFC sets out standard, industry-supported Key Performance Indicators (KPIs) for encouraging new recruits into the construction industry and upskilling those within it. The detailed Employment, Skills and Supply Chain Plan will incorporate these KPIs and these will be embedded in the obligations conferred upon the main contractors.
10.9	4.13.25	Comment referring to the Applicant's response to Relevant Representations, in the context of the reporting of reduction in agricultural land capacity (0.65%) and employment (10 FTE) that Buckinghamshire Council would benefit from being provided with more information on the anticipated impact on tenants, landowners, and local agriculture of land swaps highlighted by the Applicant.	For clarity, the Applicant's response to Relevant Representations (as well as ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]) notes at paragraph 14.8.19 that "indicatively, based on County-wide average employment per ha this would result in the reduction of the <i>indicative capacity</i> for up to around 10 FTE jobs" (emphasis added). It is further noted, to contextualise this, at paragraph 14.8.20 that "<i>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, 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</i>". The Applicant has provided an appropriate level of information about compensation, mitigation and land-swaps within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] without disclosing confidential and commercially sensitive information about Interested Parties. A note on the approach to minimising private loss was submitted at Deadline 1 in Appendix 1 to the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]. Any reduction in agricultural land has been mitigated by a land swap agreement between the affected tenant and the landowner. The land swap agreements, the terms of which are commercially confidential, ultimately seek to secure the future of the existing tenants' agricultural operations in the area. In terms of agricultural land, field surveys have been used to determine ALC grades and soil types, the findings of the survey are found within ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2], and the use of best and most versatile (BMV) land has been minimised wherever possible, through the iterative design development. It is noted that only 1.51% of the entire Site is classified as BMV, which, in the wider context of solar NSIPs, is exceptionally low, as shown within ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].
10.10	4.13.28	Comment that the Applicant's Response to Relevant Representations suggests that views of businesses most affected have been considered, but TCS Biosciences and Hogshaw Farm and Wildlife Park have both highlighted negative impacts. Further comment that the Council is keen to see these and other businesses supported, and to understand whether the mitigations and proposed	The Applicant's position in response to Buckinghamshire Council's reference to Relevant (and Written) Representations, and effects on TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park are set out at: a) Item / line 10.1 of this table; b) The Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]; and c) The Applicant's Response to Written Representations (submitted at Deadline 2).

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
10.11		amendments are sufficient to alleviate the concerns of these businesses, or if more work is required. Further comment that ongoing discussions are encouraged.	The assessment of effects on businesses – including TCS Biosciences and Hogshaw Farm and Wildlife Park – have been considered within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] drawing on individual topic-specific assessment within the EIA. The Applicant recognises that there are residual significant adverse landscape and visual effects on two identified tourist-sector receptor businesses (Claydon House and Hogshaw Farm and Wildlife Park) – however it is noted that mitigation is in place to address these effects and reduce the significance as far as reasonably practicable. In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting to the eastern edge of Parcel 2, in the form of new tree belts and hedgerows established to 3.5m, would provide some additional screening and filtering of views to the lower levels of the Proposed Development. Embedded mitigation also includes a 15m width belt of structural native woodland (early) planting along the southern boundary of Fields D8, D9, D19 and D26. 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. As indicated in the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107], the Applicant has updated the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. Such management plans also include details of mitigation measures – including the management of environmental effects, monitoring and engagement protocols, and traffic management (in the Outline CTMP [EN010158/APP/7.5.3]) as well as ecological and landscape interpretation measures (in the Outline LEMP [EN010158/APP/7.6.3]) and access improvements (in the Outline RoWAS [EN010158/APP/7.8.3]) that will manage the potential for adverse effects that could otherwise affect the operation of businesses. It is noted that in each case, Buckinghamshire Council will be the discharging authority for the management plans.
	4.13.29 - 31	Comment requesting the detailed examination of TCS Biosciences and Preston Farms as sensitive receptors given the importance of their work and how the Proposed Development could impact this, expressing concern over significant socio-economic effects that the Proposed Development may have on the businesses. Further comment noting that the evidencing of such effects is ultimately down to TCS Biosciences and Preston Farms to provide comment as Interested Parties, but Buckinghamshire Council invites the Applicant to provide further mitigation and give more consideration to these negative socio-economic effects.	The Applicant's position in response to Buckinghamshire Council's concern about effects on and mitigation for Prestons' Farm and TCS Biosciences Ltd are set out in the response to paragraph 4.6.20 and 4.6.1 of the LIR above in Table 4-10.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
10.12	4.13.31	Comment inviting the Applicant to further consider how changes to the Draft Development Consent Order and relevant Plans might achieve mitigation for impacts on businesses. Further comment recognising that some information is likely to be commercially sensitive and so Buckinghamshire Council invites the Applicant to work with TCS Biosciences and Preston Farms to look at ways to address sensitivity whilst also putting evidence in front of the ExA, as required.	The Applicant's position in response to Buckinghamshire Council's concern about effects on and mitigation for Prestons' Farm and TCS Biosciences Ltd are set out in the response to paragraph 4.6.20 and 4.6.1 of the LIR above in Table 4-10.
10.13	4.13.37	Comment that Buckinghamshire Council considers the socio-economic benefits for Buckinghamshire to be modest, short-lived and not reliably secured.	Please refer to response to comments raised in the response to paragraph 4.13.1 of the LIR above. ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] reports that while the employment and skills opportunities reflect a positive contribution to the economic and social policy objectives of local, regional and national policy, the local socio-economic effect is not likely to be significant in the context of the labour market. 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 which must be in accordance with the Outline (ESSCP) [EN010158/APP/7.14.3], and therefore would be able to work with the Applicant to direct measures to be secured within the detailed Employment, Skills and Supply Chain Plan to the primary benefit of its residents and businesses. Additionally, although the Outline ESSCP focuses, in the main, on construction, the detailed Employment, Skills and Supply Chain Plan, with its suite of actions will extend beyond construction, right throughout the operation and maintenance and decommissioning phases. Its achievements will be recorded in accordance with an agreed performance monitoring and review procedure and the Plan will be reviewed and revised at appropriate junctures and within the context of contemporary needs and opportunities. Thus, there will be a continuous programme of activity designed to deliver local economic benefit that extends approximately 42 years beyond completion of construction. The detailed Employment, Skills and Supply Chain Plan, the provisions for which will be embedded within the DCO, would be a reliable and standard method of securing benefits from the Proposed Development.
10.14	4.13.38	Comment that the Proposed Development is likely to result in meaningful socio-economic harm unless substantially stronger mitigation and long-term support measures are secured.	The Applicant does not consider that the Proposed Development would result in meaningful socio-economic harm, and has sought to clearly articulate this within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]. As indicated in the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107], the Applicant has updated the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. Such management plans also include details of mitigation measures – including the management of environmental effects, monitoring and engagement protocols, and traffic management (in the Outline CTMP

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			[EN010158/APP/7.5.3]) as well as ecological and landscape interpretation measures (in the Outline LEMP [EN010158/APP/7.6.3]) and access improvements (in the Outline RoWAS [EN010158/APP/7.8.3]) that will manage the potential for adverse effects that could otherwise affect the operation of businesses. It is noted that in each case, Buckinghamshire Council will be the discharging authority for the management plans.
10.15	7.1 Construction Workers	Comment noting that activities detailed within the Outline ESSCP are welcome and that Buckinghamshire Council are keen to work with the Applicant to ensure these are targeted towards Buckinghamshire residents. Further comment noting that a strong likelihood remains of some economic benefits being realised outside rather than within the County and the feasibility of local recruitment targeting.	Please refer to the response paragraph 4.13.1 of the LIR regarding construction labour market area (above). It is recognised that the Proposed Development (and the workforce / skills requirements and potential benefits associated with it) is one element of a broader suite of nationally significant infrastructure projects and smaller development projects in the planning and delivery stages across Buckinghamshire and on its borders. Infrastructure projects will have similar workforce requirements and some will have overlapping timescales. The Outline ESSCP [EN010158/APP/7.14.3] states that the Applicant is committed to working collectively with other developers to define workforce and skills requirements and connect with stakeholders with roles in delivering education, skills provision and routes to work in order to enable all projects to gain timely access to the workforce they need. The Applicant recognises, however, that this collaboration would open up opportunities not only across the renewable energy sector and construction, but in wider sectors. Despite this, it is considered that collaboration is the most effective way to ensure all businesses gain the workforce they need, and that job seekers access job opportunities that match their aspirations. Whilst the Applicant is committed to agreeing geographical targeting for recruitment activities and connecting, particularly, with Bucks Business First to support this, the Applicant considers that the introduction of local volume recruitment targets fosters unhealthy competition, which undermines job seeker choice and willingness of businesses to collaborate.
10.16	7.1 Employment and Skills	Comment welcoming opportunities to work with the Applicant to maximise employment opportunities for Buckinghamshire residents, but further noting that economic benefits will not be wholly confined to Buckinghamshire based residents and businesses.	Please refer to the response paragraph 4.13.1 of the LIR (above) regarding the construction labour market area and potential for the Applicant and Buckinghamshire Council to agree targeting parameters for proactive recruitment drives and skills delivery.
10.17	7.1 Employment Opportunities	Comment requesting more consideration for access to the Site. Further comment requesting that the Applicant should fund transport support for jobseekers and that, without this, jobseekers would not be able to benefit from employment opportunities at the Proposed Development.	Please refer to the response paragraph 4.13.21 of the LIR (above) with regard to supporting access to the Site.
10.18	7.1 Construction Workers	Comment welcoming the activities proposed in the Outline Employment, Skills and Supply Chain Plan. It remains unclear how the Outline ESSCP will be co-ordinated and funded and whether there is sufficient resource for more intensive support.	The detailed Employment, Skills and Supply Chain Plan will set out the Applicant's proposal for resourcing management and delivery. This will be based upon learnings from the construction of a 400MW solar farm, being developed by the EDF power solutions, which would be complete prior to construction of the Proposed Development, should DCO consent be granted.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
10.19	7.1 Longevity of Benefits	Comment recognising that some longer-term skills and employment opportunities may be supported, but that the majority of direct economic benefits remain temporary and short-term.	Please refer to the responses to paragraphs 4.13.1 and 4.13.37 of the LIR (above)
10.20	7.1 Local Businesses	Comment recommending contractors are encouraged to consider the wider social value impacts from recruitment and procurement decisions and not to focus solely on the financial costs. Further comment noting that decisions based on cost alone would reduce the benefits for local businesses.	Please refer to the responses to paragraphs 4.13.1 and 4.13.22 of the LIR (above) In addition to applying the industry agreed Key Performance Indicators included within the CITB National Skills Academy for Construction as set out within the Outline ESSCP [EN010158/APP/7.14.3] the Applicant would also work with Buckinghamshire Business First to identify how other economic gains from the Proposed Development could be identified and articulated.
Effects on Tourism and the Visitor Economy			
10.21	4.13.4	Comment requesting the strengthening of mitigation measures which reduce the impact on businesses through ongoing dialogue, enhanced visibility of construction phase management, and additional support for the visitor economy.	The Applicant welcomes the acknowledgement from Buckinghamshire Council that adjustments made following engagement with affected businesses and stakeholder groups represent potential improvements that could assist in reducing the most acute impacts on businesses such as Hogshaw Farm and Wildlife Park and Claydon House, particularly where access, biosecurity and visitor-experience issues have been raised. These measures include the incorporation of traffic-management measures, continued liaison commitments and efforts to minimise construction disruption for visitor-dependent attractions. The Applicant will seek to promote the articulation and understanding of these adaptive mitigation measures through ongoing dialogue, and enhanced visibility of construction-phase management. Buckinghamshire Council encourages the Applicant to strengthen this through additional support for the visitor economy such as promotional activity and reassurance where this would help sustain footfall during periods of disruption. While the Applicant would welcome discussion on the approach to promotional activity, it should be acknowledged that: - Effects on the tourist economy are likely to be limited in significance and spatial and temporal scope – for example there are only two receptors likely to experience significant residual adverse effects, and these effects are related only to landscape and visual impacts (air quality, noise, traffic and access and cultural heritage are not significantly affected in terms of the tourist economy, as reported in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]); - Measures to support the provision of information, engagement and reassurance, and the promotion of activity within the rural environment have been included within the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline CTMP [EN010158/APP/7.5.3], Outline LEMP [EN010158/APP/7.6.3] and Outline RoWAS [EN010158/APP/7.8.3].
10.22	4.13.34	Comment noting it is reasonable to consider how difficulties in accessing attractions such as Hogshaw	There is not expected to be an increase in difficulty in accessing tourist attractions such as Hogshaw Farm and Wildlife Park and Claydon House. As set out in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] , in the context of effects on tourism and recreational receptors, ES Volume 2, Chapter 15: Transport and Access

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		Farm and Wildlife Park and Claydon House could deter visitors. Further comment encouraging ongoing dialogue between the Applicant and appropriate businesses, regular monitoring, and further mitigation if either party considers it necessary. Further comment noting that the consideration of further amendments to Outline plans should form part of these discussions.	[EN10158/APP/6.2] [APP-058] reports that effects on the public highway (severance, driver delay, non-motorised user amenity and fear and intimidation) are at most reported as negligible adverse (not significant) - as such, effects on the accessibility and journey time to, from and within the area during the relatively short-term construction phase are not considered to be substantial to the extent that they may affect the propensity for people to visit the area or affect their experience within the area when they do. The Outline CTMP [EN010158/APP/7.5.3] will be in place to manage, monitor and adapt mitigation relating to the transport and environmental effects on tourist sector receptors related to construction traffic. Secured by the Outline CTMP [EN010158/APP/7.5.3], to assist with general traffic management during the construction period, it is proposed that a Traffic Management Group (a potential subgroup of the CLG) be formed to help advise of progress, issues and to feedback public comments. A CTMP Co-ordinator will be appointed on Site and will be responsible for the implementation of the CTMP and the monitoring of its effectiveness. The Co-ordinator will also be the communication point for all external queries raised by members of the public, whilst also being the on-site lead for the plan. It is noted that transport and access issues resulting from the operation of the Proposed Development have been scoped out of the ES due to the low level of traffic generated during the operation (including maintenance) phase.
10.23	4.13.36	Comment noting the benefit of how the Applicant could assist the visitor economy, for example through promotional support and positive messaging around the openness of attractions. Further comment noting the Environmental Statement's references to the Visitor Economy Strategy Update from 2023, however, this strategy was not adopted. Buckinghamshire Council would be open to further discussions about efforts to revive the visitor economy.	While the Applicant would welcome discussion on the approach to promotional activity, it should be acknowledged that: a) Effects on the tourist economy are likely to be limited in significance and spatial and temporal scope – for example there are only two receptors likely to experience significant residual adverse effects, and these effects are related only to landscape and visual impacts (air quality, noise, traffic and access and cultural heritage are not significantly affected in terms of the tourist economy, as reported in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] [APP-057]; and b) Measures to support the provision of information, engagement and reassurance, and the promotion of activity within the rural environment have been included within the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline CTMP [EN010158/APP/7.5.3], Outline LEMP [EN010158/APP/7.6.3] and Outline RoWAS [EN010158/APP/7.8.3]. It is acknowledged that the Visitor Economy Strategy Update from 2023 was not adopted, but this is not likely to change the sensitivity of the receptor as described in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2], which draws on strategy, research and public data on the value, volume, characteristics and components of the tourist economy.
Effects on Community Access for Recreation and Connectivity Walkers, Cyclists and Horse Riders, Including Public Rights of Way and Permissive Paths			

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
10.24	4.13.35	Comment that clarification on whether, where wider visual amenities, surroundings and views are a key influencer in the decision to visit, the mitigation proposed is sufficient to allay some of the concerns of local attractions, including Hogshaw Farm and Wildlife Park. Further comment on the importance of considering the cumulative effects, given the changes to wider visual amenity and landscape in the surrounding area due to other large infrastructure projects..	The Applicant considers that mitigation proposed for visual amenity represents a proportionate and reasonably practicable approach. In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting to the eastern edge of Parcel 2, in the form of new tree belts and hedgerows established to 3.5m, would provide some additional screening and filtering of views to the lower levels of the Proposed Development. Embedded mitigation also includes 15m width belt of structural native woodland (early) planting along southern boundary of Fields D8, D9, D19 and D26. 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 models. Cumulative effects relating to landscape and visual receptors and tourism have been considered within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3], which notes that the effects identified by the Proposed Development are based on highly localised effects on specific receptors that would not be affected by the identified cumulative projects.

Table 3-11: Soils

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Soils, Including Best and Most Versatile Agricultural Land			
11.1	4.9.5	Comment that the assessment of impacts to soil resources oversimplifies soil ecosystem services by omitting key issues like soil hydrology and drainage. Further comment noting that the sensitivity of 'soil ecosystems' has been assigned based on texture and field capacity days, which is actually an indicator of resilience to structural damage.	Soil ecosystem services have not been assessed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] as the Applicant's assessment was undertaken and issued as part of the DCO Application in September 2025, prior to the publication of the IEMA (now ISEP) Guide: A New Perspective on Land and Soil In Environmental Impact Assessment in January 2026. Industry best practice requires an ALC survey to inform the soils assessment which has been undertaken and is detailed in ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3.2] [AS-022]. The term 'soil structure' is a more appropriate term for what is currently assessed within ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]. The receptor term will be updated for Deadline 2 for clarification. Drainage and hydrology are assessed within ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038].
11.2	4.9.24	Comment that the Environmental Statement does not provide detail on how much land is required for each element of the Proposed Development and that it also does not provide a breakdown of the Proposed Development in terms of the temporary construction activities.	A breakdown of ALC grades and areas of land for the key infrastructure including the Rosefield Substation and BESS alongside temporary activities has been included in the updated ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] submitted at Deadline 2.
11.3	4.9.25 and 4.9.26	Comment that it is unclear how much soil across the 647 ha of land will be retained in a functional state during the operational phase given that the Applicant has not included details on each element. Further comment that the Applicant has not provided details on how much land would be involved in the return to agricultural land use, its ALC grade, or how ALC would be secured. Further comment that a clear strategy should be set out.	A breakdown of ALC grades and area of land for the key infrastructure including the Rosefield Substation and BESS alongside temporary activities has been included in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] at Deadline 2. It should be noted that several fields within the Order Limits required for the installation of cabling will be retained for agricultural use once the cables have been installed, following the construction phase. By following good practice and mitigation measures secured within the Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.3] the agricultural land will be reinstated and returned to the same ALC grade as prior to the installation of the Proposed Development. Following the decommissioning phase, the land would be returned to the landowner in good condition. Avoiding compaction and damage during construction and decommissioning are the main mitigation strategies to prevent long term damage to the soil. If damage does occur, amelioration will be used as outlined in sections 3.6 and 3.7 of the Outline SMP [EN010158/APP/7.7.3]. Industry best practice will be used at the time of decommissioning to ensure soil profiles are being retained and returned to prior use. An aftercare and monitoring plan has also been developed in discussion with Natural England as secured in section 13 of the Outline SMP [EN010158/APP/7.7.3].
11.4	4.9.31	Comment noting that the field capacity days are based on a dataset from 1988 so slowly permeable clay and heavy clay loams with a wetness class of	The dataset used is the same dataset used for all ALC and soil resource grading to ensure that the grading is comparable across the country. It is recognised that due to the effects of climate change there can be differences not accounted for in the 1988 dataset. However, the advice from Natural England is to still use the

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
11.5		IV should be considered to have high sensitivity to structural damage and extra precautions taken during soil handling, particularly when proposals include topsoil trafficking.	same comparable dataset until it is updated nationally. Through following the Defra (2025) ALC criteria and Defra (2009) Construction Code of practice for the sustainable use of soils on construction sites, the soil structure (soil ecosystems) is considered to be medium sensitivity as detailed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] .
	4.9.32	Comment on the trafficking and inaccessibility of top soil during the lifetime of the Proposed Development, and the difficulty in return to biomass production to support agriculture given the nature of soils involved and the Applicant not demonstrating their understanding of this in the assessment or Outline SMP.	Trafficking over topsoil will be minimal and, if required, only low pressure ground vehicles will be used. An aftercare and monitoring plan has also been developed in discussion with Natural England as detailed and secured in section 13 of the Outline SMP [EN010158/APP/7.7.3] to ensure soil biomass is considered.
	4.9.33	Comment highlighting the need for the risks to soils to be reassessed to provide more direct justification for proposing that topsoil be trafficked in winter, due to the accessibility restrictions in winter months which have not been considered.	Whilst the soil texture across the Site are heavy textures, the field capacity days (FCD) across the Site are 136-142. Therefore as the FCD are below 150 the topsoil classification is Unit B (Orange). The soil classifications are correct and cross-validated between multiple trained surveyors and lab analysis. Mitigation measures related to wet conditions for soils have been set out and secured within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] which have been agreed by Natural England as set out in the Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] . Soils will also not be worked when they are above the plasticity limit as detailed in Outline SMP [EN010158/APP/7.7.3] .
	4.9.34	Comment noting that current agricultural drainage across the land has not been discussed. Further comment on the need for an assessment of the current land drainage status to determine if it is adequate to support the operational phase of the Proposed Development.	The Defra 2025 ALC Guidance (JP-069) assumes that it is possible to install an adequate system of field drains. It is not a requirement that the field drainage system has already been installed nor that such a system is currently in a state of good maintenance. The ALC system grades the potential capacity of the land within the parameters that certain agricultural practices (including installing new or maintaining existing field drains, where required) are feasible. Deterioration of field drains can be mitigated by repair or replacement without any impact on the fundamental soil quality. Therefore, agricultural drainage does not have an impact on ALC grading. Additionally, as mentioned within Outline SMP [EN010158/APP/7.7.3] paragraphs 5.3.8, 5.4.8, 5.5.2 and 6.3.7, land drains will be restored so will have no impact on agricultural soil quality.
11.8	4.9.39	Comment that the Applicant has not demonstrated a comprehensive understanding of soil ecosystem services, and it is noted that these risks have been understated in the assessment.	Soil ecosystem services have not been assessed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] as the Applicant's assessment was undertaken and issued as part of the DCO Application in September 2025, prior to the publication of the IEMA (now ISEP) Guide: A New Perspective on Land and Soil In Environmental Impact Assessment in January 2026. Industry best practice requires the need for the ALC survey to inform the soils assessment which has been undertaken and is detailed in ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3.2] [AS-022] . The term 'soil structure' is likely a more appropriate term for what is currently assessed with ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] . The receptor term has been updated for Deadline 2 for clarification.
Adequacy of Soil Management and Mitigation			
11.9	4.9.4	Comment stating that due to the clay dominated soil profile, it is recommended that soils be classified as	Whilst the soil textures across the Site are heavy, the field capacity days (FCD) across the Site are 136-142. Therefore as the FCD are below 150. the topsoil classification is Unit B (Orange). The soil classifications are

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		high risk. Further comment suggesting additional mitigation measures such as imposing a seasonal constraint on construction activities to minimise degradation.	correct and cross-validated between multiple trained surveyors and lab analysis. Mitigation measures related to wet conditions for soils have been set out and secured within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] which have been agreed by Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] . Soils will also not be worked when they are above the plasticity limit as detailed in Outline SMP [EN010158/APP/7.7.3] .
11.10	4.9.10 and 4.9.28	Comment that the Outline SMP currently lacks detail on who will be responsible for ensuring measures are complied with and implemented.	References to when a suitably trained person or soil scientist are required have been provided within Outline SMP [EN010158/APP/7.7.3] paragraphs 2.2.7, 3.1.6, 3.2.4, 5.3.10, 5.4.4, 5.4.9, 5.4.10, 5.4.14, 6.3.2, 8.3.9, 8.4.4, 8.4.8, 8.4.10, 8.4.13, and 13.1.1. Further detail on responsibility will be provided within the detailed Soil Management Plan which will be agreed with Buckinghamshire Council prior to construction.
11.11	4.9.23	Comment noting that impacts on BMV should be minimised, and that best practice measures should also be incorporated to achieve this. Further comment noting that field surveys should be used to establish the ALC grades and identify the soil types to inform soil management.	BMV has been minimised wherever possible, through the iterative design development and it is noted that only 1.51% of the entire Site is classified as BMV. Field surveys have been used to determine ALC grades and soil types, the findings of the survey are found within ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2] . The consideration of mitigation measures that are used are set out and secured in Outline SMP [EN010158/APP/7.7.3] .
11.12	4.9.27	Comment on the limited construction methods detailed to inform on impacts on soil resources, with no detail on the land take and construction methods for differing elements of the Proposed Development's design.	A breakdown of ALC grades and area of land for the key infrastructure, including the Rosefield Substation and BESS alongside temporary activities, has been included in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] at Deadline 2. The construction methods for each element of the Proposed Development and the associated mitigation measures are set out within Outline SMP [EN010158/APP/7.7.3] .
11.13	4.9.29	Comment that there are no details about how measures relating to the handling of soil during heavy rainfall, noting that the Applicant has not proposed a seasonal constraint on construction activities.	Mitigation measures to protect the soil during handling during heavy rainfall have been considered and are detailed within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] . These have been agreed by Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] . Within the Outline CEMP [EN010158/APP/7.2.3] in table 3.7 there are mitigation measures that will be monitored by the Principal Contractor that commit to the timing of the works to be managed carefully to consider weather conditions, particularly heavy and persistent rain to minimise vehicles travelling across Site when soil conditions are wet.
11.14	4.9.30	Comment recognising that a detailed SMP will be provided, but that more detail on key roles and responsibilities must be provided at the outline stage.	References to when a suitably trained person or soil scientist are required have been provided within Outline SMP [EN010158/APP/7.7.3] paragraphs 2.2.7, 3.1.6, 3.2.4, 5.3.10, 5.4.4, 5.4.9, 5.4.10, 5.4.14, 6.3.2, 8.3.9, 8.4.4, 8.4.8, 8.4.10, 8.4.13, and 13.1.1. Further detail on responsibility will be provided within the detailed Soil Management Plan which is secured via DCO Requirement and must be approved by Buckinghamshire Council prior to commencement of development.
11.15	4.9.40	Comment that the Outline SMP needs to contain stronger protection measures.	The Applicant disagrees with this comment and has included thorough protection measures to avoid and reduce impacts to soil within the Outline SMP [EN010158/APP/7.7.3] . These have been discussed and agreed with

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]

Table 3-12: Transport and Access

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on the Road Network and Road Users			
12.1	4.7.2 and 4.7.52	Comment that changes to PRow may on occasion cause inconvenience but it is not thought that they would discourage use. Further comment recommending further changes to the Proposed Development that remove dead ends. Further comment acknowledging enhancements are already being made but that further opportunities are available and should be taken. Further comment confirming that the alternative routes are acceptable to Buckinghamshire Council.	The Applicant thanks Buckinghamshire Council for its agreement that whilst proposed changes to PRow may cause some inconvenience, this is not likely to discourage use, and for acknowledging that a number of enhancements are being made by the Applicant. The following application documents were amended at Deadline 1 to correct the dead end PRow identified by Buckinghamshire Council at Ponds Farm: • Draft DCO [EN010158/APP/3.1.4]. • Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]. • Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]. • ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]. • ES Volume 3, Figure 3.10: Existing and Proposed PRow and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]. • Outline RoWAS [EN010158/APP/7.8.3]. Further information is provided in relation to suggested opportunities/enhancements in response to paragraphs 4.7.55/4.7.65, 4.7.56/4.7.62 and 4.7.63 of the LIR below.
12.2	4.7.3 to 4.7.29	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), and the Vale of Aylesbury Local Plan (2013 – 2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016], the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.7.3 to 4.7.29 the LIR.
12.3	4.7.32 and 4.7.33	Comment discussing an update to the access arrangements and permits section of the Outline Construction Traffic Management Plan (Outline CTMP) including that no construction traffic is permitted to travel east on Granborough Road and that works to improve access for livestock movements should be undertaken. Further comment that proposal of access to the west of the agricultural feed storage area conflicts with the access drawing in the Outline CTMP which shows access to the east. Buckinghamshire Council request clarification.	The location of the access junction on Granborough Road is provided in Outline CTMP [EN010158/APP/7.5.3] and is to the east of the feed storage area. No construction traffic will be permitted to access to the east of the access junction as noted in the Outline CTMP [EN010158/APP/7.5.3].

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
12.4	4.7.40	Comment on road enhancements and that the Applicant is expected to engage with Buckinghamshire Council six months prior to the completion of construction works, to confirm whether or not works are to be retained or removed.	The commitment to engage with Buckinghamshire Council is provided in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.8.
12.5	4.7.46	Comment on the outstanding requirement for the provision of a complete swept path analysis from the A41 to the Site's access locations, and a breakdown of traffic volumes during peak hours. Further comment requesting local junction modelling which has not been provided yet and that provision of this remains necessary.	Details of the areas of constraint on the access route have already been provided in Annex 2 of the Outline CTMP [EN010158/APP/7.5.3], which considers the worst-case swept path for vehicles using the access route to and from the A41 corridor. Peak flow traffic figures will be provided to Buckinghamshire Council along with a peak hour assessment of the Station Road/A41 junction. This will be provided by Deadline 3.
12.6	4.7.48	Comment that traffic signal controls would introduce unquantified delays and that no assessment has been made for the possibility of two-way traffic to be accommodated at either end of the signals were queues of waiting traffic will form. Further comment that the Transport Assessment has made no assessment of the delay, and that if this approach is to be pursued a full update of the Transport Assessment is required.	Article 17 of the Draft DCO [EN010158/APP/3.1.4] gives the Applicant the power to temporarily place traffic signs and signals in the extents of the roads specified in Schedule 8 (traffic regulation measures). Schedule 8 identifies the relevant roads and specifies the extents of the roads that will be subject to the various controls, and the specific measures that are required to safely regulate traffic during the construction of the Proposed Development. The necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4]. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the Temporary Traffic Management (TTM) points referred to in Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions. Article 17 also includes general powers that would authorise other temporary traffic regulation measures, for the purposes of the construction or decommissioning of the Proposed Development. The inclusion of these powers is justified as they allow a degree of flexibility to respond to changing conditions on the road network over the lifetime of the Proposed Development, and importantly, are appropriately regulated because the power in Article 17(2) may only be exercised with the consent of the traffic authority concerned, and power in paragraph (3) is directly related to the power in paragraph (2). The traffic control required is over a short length of road and not over the full area. The expected delay will be minimal and dependant upon the traffic management required by Buckinghamshire Council. From previous experience, the average delay for traffic signals associated with the construction of an access junction will be circa two minutes. This level of temporary delay, occurring at the start of construction activities on the network, is not considered significant. ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] provides an assessment of the worst case traffic generation period, where the junction works will have been completed.
12.7	4.7.49	Comment that swept path analysis is required, showing safe operation of the whole access routes with the full potential traffic management schemes in place.	The Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. As noted above, the necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4] . The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions. Given the Applicant will only be closing a small distance within the wider siting zone, no swept path reviews through control junctions are considered necessary. Swept path assessments at the points of constraints from the A41 to site have been undertaken and are presented in Annex 2 of the Outline CTMP [EN010158/APP/7.5.3].
12.8	4.7.50	Comment that whilst responses on visibility splays and drawing details have been addressed post the Relevant Representation stage, there will be a review prior to construction is consent is granted.	The Applicant notes the comment and agrees. Any detailed access junction works will be subject to detailed design as set out in the Outline CTMP [EN010158/APP/7.5.3] .
12.9	4.7.51	Comment about two of the proposed permanent footpath diversions (ECL/4/2 and MCL/17/2), in terms of access issues rather than landscape or other effects dealt with elsewhere in the LIR, with an acceptance that schemes (such as the Proposed Development) create likely impacts and so attention should be on keeping these impacts in line with the NPS framework.	The Applicant has had regard to the relevant policies within NPS EN-3 (2023) and NPS EN-1 (2023) in relation to the design of the Proposed Development, as set out in section 9.24 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] and section 6.3 and a number of the section summaries of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. The diversions proposed have been included to ensure that PRoW remain open as far as possible during both the construction and operation (including maintenance) phases, reducing effects for users of the PRoW and secured by the Outline RoWAS [EN010158/APP/7.8.3]. The Applicant queries reference to MCL/17/2 and suggests that this is an error and should refer to ECL/7/2 within Parcel 2.
12.10	4.7.53	Comment that the permanent footpath diversion at Pond Farm is unacceptable given it adds a dead-end which would impact on recreational value and legibility as well as an impact on desire-lines. Buckinghamshire Council awaits the Applicant's proposed revisions. The diversion also creates a right-angle bend beside Calvert Road, an arrangement to which the Council disagrees with as it is sub-optimal as walkers follow desire-lines. An alternative solution to remove the right-angle bend has been recommended by the Council.	A number of application documents were amended at Deadline 1 to correct the dead-end PRoW identified by Buckinghamshire Council at Ponds Farm, reducing the length of PRoW SCL/12/2 that is stopped up and 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. The following application documents were amended at Deadline 1 to correct the dead end PRoW identified by Buckinghamshire Council at Ponds Farm: • Draft DCO [EN010158/APP/3.1.4]. • Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]. • Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]. • ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]. • ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]. • Outline RoWAS [EN010158/APP/7.8.3]. The right-angle bend was not highlighted by Buckinghamshire Council in its Relevant Representation and the Applicant is not aware of the alternative solution that has been proposed by the Council. The Applicant will liaise with Buckinghamshire Council on this point.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
12.11	4.7.55	Comment that the additional routes are a positive outcome, but Buckinghamshire Council recommend an additional link between Knowl Hill Farm and Knowl Hill as an improvement.	The Applicant thanks Buckinghamshire Council for its acknowledgement of the positive outcomes related to the proposed permissive routes. As the Applicant set out on page 77-78 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] , it is not possible to provide an additional link between Knowl Hill and Knowhill Farm as part of the land that this link would cross is within an area only required to be used by the 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 necessary to mitigate the effects of the Proposed Development.
12.12	4.7.56 and 4.7.66	Comment recommending connecting an existing dead-end bridleway [QUA/41/1] onto a footpath [SCL/8/2], including upgrades for passage of horse riders and cyclists. Further comment recommending accessible gates to improve mobility. Buckinghamshire Council would welcome this being secured in the Outline Rights of Way and Access Strategy.	As the Applicant set out on page 78-79 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant is not proposing to upgrade footpath ECL/8/2 (SCL/8/2 in the Local Impact Report is a typo) to a bridleway. However, consideration is being given to the potential for creating a bridleway link in this vicinity that would be accessible to the public during the operation (including maintenance) phase and will be discussed further with Buckinghamshire Council. As the Applicant set out on page 79 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Outline LEMP [EN010158/APP/7.6.3] secures the need to check stiles and gates at the detailed design stage to ensure they are safe and operationally effective, which would include consideration of accessibility. However, the Outline RoWAS [EN010158/APP/7.8.3] has been updated at Deadline 2 to secure review of the location of stiles across the Site and consideration of their accessibility during the detailed design.
12.13	4.7.58	Comment on [RR-026], with Buckinghamshire Council requiring oversight and agreement of the final diversion plan, route description, and recorded minimum width to be submitted as part of the final DCO.	The requirement to provide Buckinghamshire Council with the requested detail is secured under Requirement 16 of Draft DCO [EN010158/APP/3.1.4] . This requirement provides that the Proposed Development may not commence until details of the layout, alignment and specification of the public rights of way to be permanently substituted and provided and permissive paths to be created as part of the Proposed Development have been submitted to and approved by Buckinghamshire Council. Further, no part of the Proposed Development may commence until a detailed Rights of Way and Access Strategy (substantially in accordance with the Outline RoWAS [EN010158/APP/7.8.3]) has been submitted to and approved by the relevant planning authority. The detailed Rights of Way and Access Strategy must be implemented and maintained as approved. The Outline RoWAS [EN010158/APP/7.8.3] has been updated at Deadline 2 to include reference to recording a 2m width in the definitive statement for the diverted PRow, unless surveys indicate hedgerow removals would be required.
12.14	4.7.59	Comment that Buckinghamshire Council requires oversight and agreement of the final diversion plan for the area north-west of Pond Farm, Calvert Road, Steeple Claydon MK18 2DH and welcomes the inclusion of this within Requirement 16 of the draft DCO.	As noted in response to paragraph 4.7.58 of the LIR above, the requirement to provide Buckinghamshire Council with the requested detail is secured under Requirement 16 of Draft DCO [EN010158/APP/3.1.4] .
12.15	4.7.62 to 4.7.64	Comment asking the Applicant to reconsider diverting Bridleway QUA/41/1 to resolve dead-end route and maximise opportunities to facilitate enhancements that benefit horse riders and cyclists, who are excluded from the permissive footpath	See response to the first part of paragraph 4.7.55 of the LIR above.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		network. Buckinghamshire Council indicate that this has strong policy support from para 105 NPPF, Policy C4 of VALP, and the Bucks Rights of Way Improvement Plan.	
12.16	4.7.65	Comment highlighting the recommendation of a shorter connection between Knowl Hill and Knowl Hill Farm and the benefits this would have. Reference to this being important for the 30-month construction period when there is a net increase in vehicular movements along Calvert Road, and until wider connections can be made when the permissive path network is opened.	See response paragraph 4.7.53 of the LIR above. In addition, Calvert Road is not part of the primary construction route for construction traffic or the Abnormal Indivisible Load (AIL) access route as described in ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034] and assessed in ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] . It is therefore not anticipated that traffic would increase at all on Calvert Road during construction. The permissive paths are intended to be implemented during the construction phase, as secured in the Outline RoWAS [EN010158/APP/7.8.3] . The Applicant therefore remains of the opinion that this route is not required as mitigation for the Proposed Development.
Adequacy of Construction Traffic Management			
12.17	4.7.1	Comment that Buckinghamshire Council has previously raised concerns about construction related impacts, and that they still hold the position that certain information and controls remain outstanding. Further comment about concerns over the proposed use of temporary traffic signals, and that further information is needed.	The Applicant is grateful to the Council for continuing dialogue on transport matters and notes that several items have already been addressed in the Outline CTMP [EN010158/APP/7.5.3]. Ongoing dialogue will continue on any further matters of concern. With regards to traffic signals, the Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. The necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4]. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions. Further information relating to peak hour traffic flows and junction modelling will be provided at Deadline 3.
12.18	4.7.34	Comment accepting that movements to the west will still interact with construction traffic. Further comment that the number of movements are noted and accepted, however there is further comment made on an expectation of the Applicant to establish a working relationship with the agricultural operation to ensure highways conflicts are avoided and both operations can co-exist. Further comment is made supporting the addition of a requirement within the Outline CTMP to ensure agricultural operations can continue uninterrupted.	The Applicant welcomes Buckinghamshire Council for its agreement to the additional measures noted in the Outline CTMP [EN010158/APP/7.5.3] with regards to road signage and livestock crossings to ensure agricultural operations can continue unimpeded. The Applicant intends to continue in good faith, using industry best-practice if the DCO is approved by the Secretary of State and will work with all relevant stakeholders and agricultural interests in a positive manner during the construction process.
12.19	4.7.41	Comment on the submissions needed prior to the undertaking of construction works including a	The measures are already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.9.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		programme for the works, details of construction methods and traffic management, drawings and specifications, health and safety information, details of the proposed contractor, a Road Safety Audit (if required), details of signage and road markings, and details of any proposed remediation proposals should works be temporary.	
12.20	4.7.42	Comment that the Applicant will reimburse the highway authority for the technical approval process at the time the applications are made, and that these applications will be in line with similar S278 or S184 applications also made under the Highways Act. Further comment that detailed CTMP will detail the process for these technical approvals.	This commitment is already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.10.
12.21	4.7.43	Comment that any written consent from the Highway Authority in relation to a Temporary Traffic Regulation Order (TTRO) will follow the required procedure at the time of application and include full details which are to be issued by the Highway Authority in a 'roadworks bulletin'. This includes dates, times, locations, diversions, and contact numbers for the TTRO. Further comment made that any changes to the Proposed Development (post consent) is made known to the Highway Authority.	This commitment is already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.11.
12.22	4.7.44	Comment noting that comment in the above paragraphs of the LIR do not enable a bond to be taken through a S278 agreement which allows the Highway Authority to safeguard against works that don't meet adoptable standards. Further comment that provision is required within the draft DCO.	The Applicant is proposing a hybrid solution where the Council can secure all necessary agreements and fees. Under Article 16 within Part 3 of the Draft DCO [EN010158/APP/3.1.4] , the undertaker may enter into an agreement with the street authority in respect of highway works carried out under powers conferred by the Order. It is the Applicant's expectation that these works would be the subject of such an agreement which could require the provision to the Council of reasonable security for completion of the works.
12.23	4.7.47	Comment on Schedule 8 Part 2 of the draft DCO that there is concern that the temporary traffic signals are not set out in the Transport Assessment. Further comment that the proposal for up to 1.12km length of public highway to be under temporary traffic signal control is unacceptable without assessment or justification.	The Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. In particular, Article 17 (Traffic regulation measures) provides the undertaker with powers to temporarily change speed limits and place temporary traffic signs and signals in the extents of the roads specified in Schedule 8 (traffic regulation measures). Schedule 8 Part 2 identifies the relevant roads and specifies the extents of the roads that will be subject to temporary traffic signals. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in Part 2, only a small distance within those wider zones. These measures are justified and required to safely regulate traffic during the construction of the Proposed Development. The powers are commonly included in orders granting permission for infrastructure projects where it is necessary and in the interests of

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			public safety during construction of the Proposed Development for the developer to put in place some temporary restrictions on road usage.
12.24	4.7.60 and 4.7.61	Comment referring to earlier request for segregation of non-motorised users along Three Points Lane to avoid conflict with construction traffic. Further comment requesting clarification regarding construction compound sizes and statement that Council would accept no segregation of non-motorised users along Three Points Lane provided it receives the clarification sought.	The Applicant thanks Buckinghamshire Council for its agreement that segregation of non-motorised users along Three Points Lane is not required, subject to confirmation on the size of construction compounds. The dimensions of the proposed construction compounds are explained in ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034] , which sets out that each Primary Construction Compound would be no greater than 25,000m ² in plan. This is shown indicatively in ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.2] [AS-021] , where a square of the dimensions equating to 25,000m ² is indicated in the vicinity of Three Points Lane. The maximum plan area of the compound is secured through the Outline CEMP [EN010158/APP/7.2.3] .

Table 3-13: Water Environment (including Flood Risk and Drainage)

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Effects on Flood Risk Within and Outside the Order Limits			
13.1	4.11.1	Comment noting the flood risks across the Order Limits vary. Further comment noting that whilst there are no historic records of flooding within the Site, isolated events in nearby settlements suggest drainage systems in the wider area may be susceptible to flooding during periods of prolonged rainfall.	The Applicant acknowledges that flood risk varies across the Order Limits and that isolated local flooding indicates wider drainage sensitivities in surrounding areas. Although no historic flooding is recorded within the Order Limits , this does not mean flooding has not occurred and the ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3] accounts for this by incorporating SuDs, maintaining overland flow paths and ensuring attenuation is designed so that the Proposed Development does not add to on or offsite flood risk during prolonged rainfall (Outline Drainage Strategy [EN010158/APP/7.11.3]).
13.2	4.11.2	Comment noting that, without appropriate controls, the introduction of impermeable infrastructure (e.g., compounds and access tracks) has the potential to increase run off rates increasing pressure on watercourses. Further comment noting that compaction, in the absence of mitigation, could exacerbate this the risk of surface water ponding and sediment mobilisation too, increasing flood risk elsewhere.	Areas of impermeable surfacing are limited, with access tracks designed to be permeable and maintain infiltration. Where impermeable elements are required, runoff will be managed through SuDS as detailed in the Outline Drainage Strategy [EN010158/APP/7.11.3] to ensure discharge does not exceed greenfield rates, including an allowance for climate change. As noted and secured within the Design Commitments [EN010158/APP/5.9.4], Design Commitment E2 states that Internal access tracks will typically be surfaced with permeable material such as gravel and will include drainage such as a swale or ditch on the downhill side of the track. However, and for the purposes of assessment within the Outline Drainage Strategy [EN010158/APP/7.11.3], it is assumed that access tracks will be constructed from a Hydraulically Bound Mixture (HBM), classifying them as impermeable surfaces. This conservative, worst-case scenario has been used to demonstrate and ensure that the drainage design has capacity to handle all surface runoff from the site, including the access track areas. In practice these areas will not be fully impermeable, therefore the assessment is conservative. Risks associated with compaction and sediment mobilisation during construction will be controlled through the Outline CEMP [EN010158/APP/7.2.3] including measures for soil management. Vegetated cover will be retained across the site to promote natural infiltration and minimise surface water runoff. Overall, with embedded design and additional drainage controls, there will be no increase in surface water flood risk leaving the Site or additional flood risk.
13.3	4.11.3 to 4.11.32	Comments noting the planning policy backdrop which frames the policy compliance assessment of the Proposed Development, with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), and the Vale of Aylesbury Local Plan (2013 – 2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] , the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.11.3 to 4.11.32 the LIR
13.4	4.11.35	Comment recognising that four overland surface water flow routes cross Parcel 1 with ponding noted in Field B7. Further comment that these flow routes place parts of Parcel 1 at a high risk of surface water flooding.	The ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3] maps and the Outline Drainage Strategy [EN010158/APP/7.11.3] have identified overland flow paths across the Order Limits including in Parcel 1 and localised ponding potential at Field B7. The design preserves and formalises these paths as designed exceedance routes, sets PV Panel modules above calculated flood depths, and provides interception/edge swales with downstream attenuation to reduce peak runoff rates across all storm events, with climate change allowances to 4l/s/ha, which is lower than the greenfield QBAR runoff rate. No

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			vulnerable infrastructure is placed within high flood risk conveyance corridors including surface water flow paths, with Solar PV panels raised to allow for a minimum freeboard of 600mm to ensure flow conveyance. All SuDS attenuation features have been carefully planned to either lie outside the pluvial flood outlines or aid the conveyance of the overland flow paths.
13.5	4.11.36	Comment recognising that two overland surface water routes cross Parcel 2. Further comment recognising a high risk of surface water flooding within Fields D8, D9, D16, D18 and D27 with a medium risk of surface water flooding within Fields D10 and D17.	Parcel 2's overland routes are accommodated by keeping flow corridors open, setting minimum equipment levels (raised Solar PV panels), and introducing SuDS features to intercept and attenuate runoff. Flood risk from all sources, including surface water flood risk, is assessed in ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]. The fields identified (D8, D9, D16, D18, D27) have been subject to detailed overland flow modelling and whilst the risk not considered significant, sensitive assets have been designed to ensure suitable mitigation for the level of risk. In addition, the Solar PV development will be offset at least 10m either side from all existing ditches and ordinary watercourses except where access tracks and/or cable routes are required to cross an existing feature as secured in the Design Commitments [EN010158/APP/5.9.4]. All SuDS attenuation features have been carefully planned to lie outside the pluvial flood outlines as shown in Outline Drainage Strategy [EN010158/APP/7.11.3].
13.6	4.11.37	Comment recognising that one overland surface water route crosses Parcel 3. Further comment that this route places Parcel 3 at a high risk of surface water flooding. Further comment noting that there is an ordinary water course within Parcel 3 which is subject to fluvial flooding as opposed to surface water flooding.	Within Parcel 3 and across the Order Limits, the Proposed Development does not impact on the overland flow routes. Flood risk from all sources including fluvial and surface water is detailed in ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]. Rosefield Substation, BESS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds will be located outside of Flood Zone 2 and 3 areas within Parcel 3 and perimeter fencing surrounding the Solar PV development will be offset at least 10m either side from all existing ditches and ordinary watercourses except where access tracks and/or cable routes are required to cross an existing feature and as secured in the Design Commitments [EN010158/APP/5.9.4]. Critical energy infrastructure elements including the Rosefield Substation, BESS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds have been designed to avoid any areas with fluvial or high pluvial risk, with Solar PV panels in these areas raised to ensure flow conveyance. All SuDS attenuation features have been carefully planned to lie outside the pluvial flood outlines as shown in Outline Drainage Strategy [EN010158/APP/7.11.3].
13.7	4.11.48 and 4.11.51	Comment noting that the FRA assesses the risk of surface water flooding to and from the Proposed Development and demonstrates how this risk will be managed. Further comments that the Outline Drainage Strategy is satisfactory and that measures included in the Outline Drainage Strategy demonstrate that the peak rate and volume of discharge from the Site can be adequately managed and that surface water runoff from the Site is no greater than the rates prior to the Proposed Development. Further comments that climate change	The Applicant welcomes these comments in respect of the ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3] and Outline Drainage Strategy [EN010158/APP/7.11.3] .

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		has been considered in the FRA and Outline Drainage Strategy.	

Table 3-14: Other Matters

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
Assessment of, and Effects from the Proposed Battery Energy Storage Systems			
14.1	5.1.2	Buckinghamshire Council reiterates their points from within the submitted Relevant Representation, highlighting that the proposed layout of the Proposed Development ought to be re-considered to respond proactively to the existing key constraints.	The Applicant disagrees that there is a need to make modifications to the submitted design. The Design Approach Document [EN010158/APP/5.8.2] [REP1-018] sets out the Design Principles that have influenced the design of the Proposed Development and sets out how the design has evolved to respond proactively to key constraints and feedback. Buckinghamshire Council draws out each of their suggested amendments in more detail in the paragraphs of the LIR following paragraph 5.1.2. The Applicant responds to each of the suggested amendments below.
14.2	5.1.3	Buckinghamshire Council notes that the proposed location of the BESS in Fields D8 and D9 is not appropriate due to the negative effects on landscape that would be substantial. Further comment requesting that the Applicant moves the BESS closer to the East Claydon Substation as this would be more appropriate.	The Applicant provides detailed responses to these points in Table 4-2: Need, Site Selection and Alternatives, particularly in response to paragraphs 4.2.19, 4.2.25, 4.2.26, 4.2.27 and 4.2.28 of the LIR in Table 4-2 above. In summary, Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape, with higher landform behind it, when viewed from the east and south. The harm to significance of Botolph Claydon and Middle Claydon Conservation Areas would be less than substantial and the effects would be not significant with the BESS in Fields D8 and D9. Constraints such as pylon clearances, areas of higher flood risk, and potential visual/noise effects to Sion Hill Farm are expanded on in responses to paragraphs 4.2.26 and 4.2.27 of the LIR above in Table 4-2, demonstrating why alternative fields within Parcel 3 of the Site are not appropriate locations for the BESS.
14.3	5.1.4	Comment requesting that the letter submitted by the Applicant to Buckinghamshire Council regarding the location of the BESS is submitting into the examination process to ensure all parties can formally provide comments for the ExA.	The Applicant notes this comment and confirms that the letter has been submitted into Examination as Appendix 1: Letter to Buckinghamshire Council on BESS Locations to this document.
14.4	5.1.6	Comment noting the most appropriate location of the BESS are Fields E10 and E11; and Buckinghamshire Council would welcome clarity on why the Applicant states that these field parcels are 'insufficiently sized' for the BESS development.	As confirmed in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], Fields E10 and E11 were discounted for BESS development due to the presence of higher flood risk and offsetting requirements from overhead lines and pylons which transect the fields. For Field E11, the proximity of Sion Hill Farm and associated noise and visual impacts weighed on the design decision to remove BESS development from this field. As is noted in NGET's Written Representation [REP1-130] and response to Examining Authority's Requests for Information [AS-037], NGET requires an easement of 30m either side of a tower, it's base and the overhead lines that run between them. This gives rise to a 60m easement in diameter from NGET's assets and this significantly reduces the area of unconstrained land for development and therefore the capacity of Fields E10 and E11 to facilitate the area required for the BESS development. Further detail is provided on these points in response to paragraphs 4.2.26 and 4.2.27 of the LIR above in Table 4-2. Notwithstanding the reasoning above and as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are <i>"vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision"</i> and that such alternatives should be identified <i>"before an application is made to the Secretary of State"</i>.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
14.5	5.1.7	Comment noting that due to effects on Bechstein's bats and also effects on the Aylesbury Vale Area of Attractive Landscape, it considered that PV (or other electrical infrastructure) should not be built out in Fields B6, B7, B8, B10, B11, D28 and D29. Further comment accepting that these Fields can remain within the Order Limits for Proposed Development, but that they consider these fields should be put to appropriate mitigation rather than for electrical infrastructure.	As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] [RR-026] (page 21) the Applicant is not intending to remove Solar PV development from these fields. In addition a detailed response regarding these fields has been given in Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] [RR-203] (page 209 to 214) outlining why, in the context of the landscape scale mitigation proposed (approx. 95ha of grassland proposed for mitigation for ground nesting birds and foraging bats), the placing of solar PV panels in these fields is unlikely to cause a significant effect with regards to foraging bats and that overall there will be no net loss of cattle grazed 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. 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 panels to foraging and commuting bats and ensure the connectivity between these woodlands is maintained. As is detailed in the Outline LEMP [EN010158/APP/7.6.3] through consultation (see ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]), removal of proposed Solar PV from a number of fields has been agreed. Where solar PV has been removed from the Proposed Development, these areas would be used to provide semi natural habitat for species and mitigation areas. Whilst it is acknowledged that there would be likely significant effects on landscape character to Fields D28 and D29 as a result of the Proposed Development, this would be experienced to only a limited extent and would not be significant across the wider Quainton-Wing Hills Area of Attractive Landscape. Fields D28 and D29 are considered appropriate for solar PV development due to the visual enclosure created by their topography and existing vegetation to the south of the fields, which separate them for the wider and more visually open parts of the Area of Attractive Landscape within the Order Limits where solar PV development is not proposed.
	5.1.14	Comment noting Buckinghamshire Council's position is that the Proposed Development, as currently presented, does not meet the policy requirements necessary for development of this nature to be supported and that the balance of considerations points firmly against development consent.	The Applicant strongly disagrees. As set out in section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] the Applicant concludes that 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. There is an established need for the Proposed Development, which is of a critical nature.
Overall Net Greenhouse Gas Emissions			
14.7	4.15.1	Comment noting support to the approach taken for the assessment of climate change and Greenhouse Gas Emissions; alongside accepting the mitigation measures that the Applicant has adopted.	The Applicant notes this comment.
	Other Matters		

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
14.8	2.1.1	Comment noting concern around the influence of new infrastructure within the area that consists of mainly agricultural field parcels.	The Applicant has undertaken a detailed assessment of the likely significant effects of the Proposed Development on landscape fabric, landscape character and visual amenity as set out in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] .
14.9	2.3.1	Comment noting that there are a number of key recent applications of note which are provided for within Section 2.3 of the LIR. Further comment noting that the Applicant should review these applications to ensure they have been considered in the DCO Application to the required extent.	The Applicant has reviewed the list of recent applications within Section 2.3 of the LIR and confirms that Appendix 3 (Planning History) of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] accurately captures all those referenced planning applications. The Applicant has noted that several of these applications do not fall within the criteria outlined in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] . The applications listed within Section 2.3 that do fall within the criteria have been considered in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] which was updated at Deadline 1.
14.10	3.2.20	Comment noting that the draft National Planning Policy Framework (NPPF) has not been considered within the LIR response, but Buckinghamshire Council (once the updated NPPF becomes available) may comment further with regard for the relevant changes that relate to the Proposed Development.	The Applicant notes this comment. The draft NPPF was published on 16 December 2025 for public consultation, which closed on 10 March 2026. The Applicant has assessed the Proposed Development against the in force NPPF which is considered capable of being both an important and relevant policy document to the Secretary of State's decision. The Applicant notes Buckinghamshire Council's position with regard to any forthcoming NPPF and the Applicant confirms it will also consider the forthcoming NPPF should it become available ahead of the close of Examination.
14.11	4.12.2	Comment noting that the decommissioning phase would commence after a 40 year operation (including maintenance) phase and that the Applicant should undertake a new air quality assessment immediately prior to the decommissioning of the Proposed Development to inform the final Dust Management Plan.	Mitigation measures have already been incorporated into the Outline DEMP [EN010158/APP/7.4.3] . The Applicant will undertake an update to the dust risk assessment portion of the air quality assessment prior to the decommissioning phase, which will be incorporated into the detailed Decommissioning Environmental Management Plan in line with guidance and legislation at the time of decommissioning to mitigate air quality and dust impacts. A detailed Decommissioning Environmental Management Plan will be produced prior to decommissioning as secured in the Draft DCO [EN010158/APP/3.1.4] . This will be submitted to and approved by the Relevant Planning Authority prior to the decommissioning phase.
14.12	4.12.2	Comment noting that bespoke mitigation should be proposed within the relevant management plans to address the sensitivity of nearby businesses, such as TCS Biosciences and Preston Farms.	The Applicant has updated the Outline CEMP [EN010158/APP/7.2.3] , Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at Deadline 1 to include bespoke mitigation to address the sensitivity of Preston Farms and TCS Biosciences. The Applicant has also submitted further information within Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm of the Applicant's Response to Written Representations [EN010158/APP/8.12] at Deadline 2.
14.13	4.12.2	Comment noting that Buckinghamshire Council would like to seek clarity on operational traffic movements and the enforceability of staff minibuses arrangements, to ensure that traffic-related air quality impacts remain within the parameters assessed. Further comment that should the enforcement of the minibuses arrangements not be made, then Buckinghamshire Council would wish to see the air quality assessment updated to	The operational traffic volumes are noted in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], which states that "The average number of trips per day would be less than twelve trips per day, which is the equivalent to traffic impact of between 2% and 3% between the A41 and the main Site access junction on Claydon Road. During the operation of the Site, it may be necessary to replace panels or BESS units (in full or replace parts) as part of rolling lifetime enhancement plan. The level of HGV traffic associated with this will be significantly lower than the peak of construction traffic and is expected to be circa 12 HGV movements per day.

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		reflect the correct number of staff/LDVs arriving on Site.	Staff travel via minibus for construction work is set out in Outline CTMP [EN010158/APP/7.5.3] and secured in the Draft DCO [EN010158/APP/3.1.4] and is therefore a legal requirement to provide.
14.14	4.12.29	Comment requesting that the Applicant reviews the Transport Assessment and Air Quality Assessment, as there is currently a contradiction in the number of daily trips/operational trips across these documents. Comment that further assessment is required as both numbers are between the EPUK & IAQM guidance.	As per the section 5.4.5 of the ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] and Table 6.15 of the ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4] [APP-086] both show a peak month of max 218 light duty vehicles and 141 heavy duty vehicles (HDVs). We accept that 141 HDVs is above the EPUK IAQM guidance screening criterion however this is for a relatively short period as these relate to the peak month only (month 8). As per the section 5.4.6 of ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] , the average traffic flows across the entire construction period for HDVs is 85 AADT, below the 100 AADT EPUK IAQM guidance screening criterion.
14.15	4.14.1	Comment that Buckinghamshire Council has concerns over the effects of the Proposed Development on materials and waste. They consider that the Applicant has not provided enough detail of streams and volumes of construction materials/waste to see how it can be scoped out of assessment.	ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2 sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phases. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design. Mitigation measures in relation to waste management are secured within the Appendix 1 – Outline Site Waste Management Plan of the Outline CEMP [EN010158/APP/7.2.3] which is secured as a Requirement in the Draft DCO [EN010158/APP/3.1.4] . This would also form the basis for mitigation measures for waste management for the operation (including maintenance) and decommissioning phases of the Proposed Development, as detailed in and secured by the Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] which have been submitted in support of the DCO Application.
14.16	4.14.1	Comment that Buckinghamshire Council agrees with the decision to scope out materials and waste from the EIA, but they request further evidence to support this issue. Further comment that the provision of requisite documents would be supportive.	The Applicant has provided detailed justification for scoping out material assets and waste from the ES within ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048] . Alongside this, ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2 sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phases. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design. The Cumulative Waste Study , which formed Appendix 1 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] submitted at Deadline 1 and has been updated and submitted as Appendix 2 to this document at Deadline 2, provides detail on the cumulative impacts of waste arising from the Proposed Development alongside other solar schemes. Mitigation measures in relation to waste management are secured within the Appendix 1 – Outline Site Waste Management Plan of the Outline CEMP [EN010158/APP/7.2.3] which is secured as a Requirement in the Draft DCO [EN010158/APP/3.1.4] . Further detail on materials and waste management will be included in the detailed Construction Environmental Management which would be agreed with Buckinghamshire Council following the detailed design.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
14.17	4.14.20	Comment that Buckinghamshire Council requests clarity over the calculation of the waste streams, to confirm whether this is calculated per year or on an overall Proposed Development basis and does not include waste from the compound demobilisation.	The waste streams have been calculated for all phases of the Proposed Development over its intended design life of 40 years to provide overall waste volumes across the whole site and programme. This includes construction, operational (including maintenance) and decommissioning phases of the development. Please see the updated ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design. These base calculations have been derived based on previous experience of other project sites.
14.18	4.14.20	Comment requesting that the recycling rates proposed are justified.	Waste estimates have been generated based on project experience and available recycle rates from UK based PV recycling specialists. Recycle rates from PV recycling specialists for the equipment within the current design have been used to derive the assumed recyclability rates. Future technology advancements may improve the recyclability of the materials, therefore the rate that we have assumed is justified at this early design stage.
14.19	4.14.21	Comment seeking clarity to understand whether the proposed removed aggregate would be excavated aggregates or also includes aggregates brought to the Site for the purposes of the Proposed Development.	During construction, no aggregate is expected to be excavated from the Site e.g. borrow pits. Any excavated aggregate as part of on-site construction activities would be recycled on Site unless there is an instance for contaminated soil to be removed in line with the measures set out in the Outline CEMP [EN010158/APP/7.2.3]. Any imported aggregate brought to site during construction will be removed upon decommissioning and recycled.
14.20	4.14.22	Comment that Buckinghamshire Council are not in agreement with the Applicant's statement that there would be minimal packaging and office waste from the Proposed Development, with the majority of it being recycled. Further comment noting that 600 staff on-site would not result in 'minimal' waste.	The waste streams have been calculated for all phases of the Proposed Development over its intended design life of 40 years to provide overall waste volumes across the whole site and programme. This includes construction, operational (including maintenance) and decommissioning phases of the development. Please see the updated ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design. These base calculations have been derived based on previous experience of other project sites.
14.21	4.14.24	Comment noting concern that a future baseline could have been estimated by extrapolating historic data forward. A baseline study area of the southeast, but without a zone of influence of only 10km seems at odds. Further comment noting that the current baseline merges together inert and non-hazardous waste and does not show hazardous at all, this should be split out as wastes, such as the PV panels, will be non-hazardous or may even be hazardous waste. It is also noted that data is only for decommissioning and does not cover construction (600 staff on their own will generate office type waste) and operation.	There is no published data on future landfill capacity, and accurately predicting void capacity over the lifetime of the Proposed Development is not feasible. Cumulative Waste Study which formed Appendix 1 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] submitted at Deadline 1 and has been updated and submitted as Appendix 2 to this document at Deadline 2, operates under the assumption that future landfill void capacity will remain comparable to current levels. Additionally, under the assumption that the Waste Planning Authority will plan and allocate sufficient landfill capacity to meet future needs, in accordance with Section 3 of the National Planning Policy for Waste. 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

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			The data used to inform the baseline for the Cumulative Waste Study has been derived from the Environment Agency on landfill capacity 2024. In accordance with the Planning Inspectorate's Advice on Cumulative Effects Assessment, the search area has been determined by affording consideration to the Zone of Influence of each environmental factor assessed within this ES. The South East region has been used as the study area as the study acknowledges that waste is not always processed within the Waste Planning Authority where it is generated and may instead be managed at a regional level. In relation to hazardous waste, it is not anticipated hazardous waste would be produced from the Proposed Development. As referenced within the Environmental Permitting Guidance – The Landfill Directive, inert waste may be placed in landfills for non-hazardous waste, provided it fulfils the appropriate criteria, in which inert waste typically does. The decommissioning phase formed the basis of the technical study as this is the phase that represents the highest waste generation during a solar farm development's lifetime. This is due to the removal of all Solar PV modules and associated infrastructure. In contrast, construction waste is significantly lower in volume, therefore, it is reasonable to assume the construction and operation phase waste arising would be substantially lower than the decommissioning phase total. Accordingly, the study estimates that under a worst-case scenario cumulative impact would result in 0.37% of regional landfill capacity to be required for the Proposed Development. It is therefore reasonable to conclude that the construction and operation phase would result in a materially lower landfill capacity requirement.
14.22	4.14.25	Comment seeking clarity on the materials required for the construction of the Rosefield Substation Compound would be appreciated by Buckinghamshire Council to understand the waste that would come with this.	The workstreams that will exist for the Rosefield Substation Compound have been covered in the Outline CEMP [EN010158/APP/7.2.3]. Within the Appendix 1 Table 2 the anticipated waste streams are listed. These include, site preparation and excavation, with excavated soil and organic waste, followed by foundation and trenching waste which may produce concrete waste, rebar offcuts and waste aggregate. Installation of electrical equipment which may produce cable cuttings and insulation offcuts. Construction of access roads may produce asphalt debris, concrete rubble, gravel waste and bitumen scraps. Further information around waste management and minimisation can be found within the Outline CEMP – Appendix 1.
14.23	4.14.26	Comment noting that the Applicant has considered total waste generation as detailed in Environmental Statement Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste and has confirmed 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). Further comment noting that Buckinghamshire Council remains concerned that this does not account for worker waste, packaging, or waste from the demobilisation of temporary	These movements are summarised under general deliveries (along with other supplies) and are included in the traffic profile noted in Annex 2 of ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]. Total waste generation has been updated to include worker waste based on a rate of 200kg per person per year. This value is derived from current English household waste values per person which is 377kg per year and factoring it down to account for the time workers will be on site. This data has been used to inform the baseline in the updated Cumulative Waste Study (which formed Appendix 1 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] submitted at Deadline 1 and has been updated and submitted as Appendix 2 to this document at Deadline 2)

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
		construction compounds etc., therefore it is difficult to understand that it has taken account of all waste.	
14.24	4.4.18	Comment noting concerns with waste and recycling and that such concern undermines confidence that the Applicant has sufficiently reported on the correct level of traffic impacts where full material and waste volumes are unknown at this stage.	The movements for material and waste are summarised under general deliveries (along with other supplies) and have been included as a reasonable worst case for the purposes of the assessment. These are included in the traffic profile noted in Annex 2 of ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] .
14.25	Table 5.1	Article 2(1) – Buckinghamshire Council raises concerns that all of Works No. 9 are to be permitted under preliminary works and they consider that there should be limitations on the extent of those works which can be properly described as preliminary should be explored further.	As explained in the Explanatory Memorandum [EN010158/APP/3.2.3] at section 4.2.2, Work No. 9 (works to facilitate Work Nos. 1 to 8 and 10, being highway works including highway improvements and creation of accesses) has been included in the definition of “permitted preliminary works” as a response to the Applicant’s experience from the implementation of another made solar DCO, where highway works have inadvertently triggered certain obligations that are not strictly necessary to be in place at the stage the highway works are being undertaken. In addition, the Applicant has carefully considered each requirement in Schedule 2 and specifically included Work No. 9 as part of “commence” where mitigation or management is needed with respect to that work. As such, sufficient controls are in place with respect to this works package and it is appropriate that it is a permitted preliminary work. The Applicant considers that it has provided sufficient justification for inclusion of Work No. 9 within the definition of “permitted preliminary works”, and notes that the Council has not identified any specific concerns regarding particular elements of Work No. 9 which are not appropriate for inclusion in the definition. Should the Council wish to put forward suggestions for specific elements which should sit outside of the definition of “permitted preliminary works”, with reasons, the Applicant would be happy to consider this further.
14.26	Table 5.1	Article 2(1) – Buckinghamshire Council asks for the definition of vegetation removal parameters to be updated to make it clear that the cross-reference in Schedule 13 should be clear that these parameters are established under Appendix 3 to the Outline LEMP.	The definition of “vegetation removal parameters” is “ <i>the plans of that name identified in the table at Schedule 13 and which are certified by the Secretary of State as the vegetation removal parameters for the purposes of this Order</i> ”. The table at Schedule 13, in the “vegetation removal parameters” row, refers to revision number 1 of document reference EN010158/APP/7.6 (being the Outline LEMP [EN010158/APP/7.6.3]), to which the vegetation removal parameter plans are Appendix 3. The Applicant has updated Schedule 13 of the Draft DCO [EN010158/APP/3.1.4] to include reference to Appendix 3 of the Outline LEMP [EN010158/APP/7.6.3] in the entry referring to the vegetation removal parameters plan. The Applicant has also updated the document revision numbers in Schedule 13 at Deadline 2.
14.27	Table 5.1	Article 6(1)(e) – Buckinghamshire Council requests clarification on why s.118 WIA 1991 has been disapplied within the draft Development Consent Order submitted by the Applicant. Buckinghamshire Council believes that this is due to Article 18 providing a bespoke regime for discharge, but notes that this is not apparent from the existing explanation.	As set out in the Explanatory Memorandum [EN010158/APP/3.2.3] at section 4.2.13, disapplication of section 118 of the Water Industry Act 1991 is sought on the basis that it addresses a matter of which the merits and acceptability will, if the Order is made, have already been sufficiently considered and resolved through protective provisions for the protection of the relevant drainage authorities (Part 3 of Schedule 15 to the Draft DCO [EN010158/APP/3.1.4]). Such matters should therefore not be the subject of further regulatory consideration or control, which would cause unnecessary uncertainty and duplication, and may unjustifiably delay the implementation of the Proposed Development. As the Council notes, article 18 of the Draft DCO [EN010158/APP/3.1.4] (which is a model provision) allows the undertaker to discharge water into any watercourse, public sewer or drain in connection with the construction and maintenance of the Authorised Development in accordance with the terms of that article. Article 18(5) provides that where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
			the control of a drainage authority, the provisions of Part 3 of Schedule 15 (protective provisions) apply in substitution of the provisions set out in the article.
14.28	Table 5.1	Article 6(1)(e) - Buckinghamshire Council believes that s.106 WIA 1991 should be disapplied on the same basis as s.118 WIA 1991, as the communication with public sewers should be managed through the Article 18 regime.	The purpose of article 6, and the ability under section 120(5) of the Planning Act 2008 for a DCO to apply, modify or exclude statutory provisions, is intended to address circumstances where an existing statutory provision may contradict or result in unnecessary additional regulation of a matter which can be adequately addressed in the relevant DCO. The Applicant does not consider that this applies to section 106 of the Water Industry Act 1991, which establishes a statutory right, rather than a regulatory or control mechanism, and therefore does not consider that it is necessary or appropriate for it to be disapplied. The Applicant is not aware of any precedent for the disapplication of section 106.
14.29	Table 5.1	Article 12 - Buckinghamshire Council raises concerns that there is insufficient security currently placed on the Applicant to return the streets and/or PRowS to the same condition as prior to their use for temporary works purposes, and considers that the provision in Article 12 to achieve this may be more appropriate.	Article 12 provides that the undertaker may, " <i>temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert any street or public right of way...</i> " (emphasis added). It is therefore expressly temporary in scope, i.e. there is an implied requirement for reinstatement. In addition, the nature of activities authorised by article 12 would not generally involve an alteration to the relevant street or public right of way's condition (the exception to this is the ability to "alter" streets/rights of way, although again the article is explicit that such alteration would be temporary only). Further, article 12(3) provides that the undertaker may restrict the use of the public rights of way specified in column 2 of the table in Part 2 (temporary management of public rights of way) of Schedule 6 (streets and public rights of way) only to the extent specified in column 3 of that table. For any other public right of way, article 12(4) provides that this may not be done without the consent of the street authority, and that the street authority may attach reasonable conditions to any such consent. As such it would be open to Buckinghamshire Council as street authority to impose reasonable conditions in respect of reinstatement in relation to any temporary works outside of those expressly authorised by the Order. In addition, the Outline RoWAS [EN010158/APP/7.8.3] provides (at paragraphs 4.2.2 and 6.3.4) that temporarily diverted PRow will be reinstated to their original route and to at least their original condition following track and cable trench construction activities. The Outline CTMP [EN010158/APP/7.5.3] also provides (at paragraph 4.7.11) for reinstatement works to be undertaken following completion of construction activities.
14.30	Table 5.1	Article 22(1) – Buckinghamshire Council raises a typographical error within the current sentence saying " <i>facilitate, or as it incidental, to it</i> " as this should rather say " <i>facilitate it, or as is incidental to it</i> ".	The Applicant agrees there is a minor typographical error in the wording of article 22(1) and will update the Draft DCO [EN010158/APP/3.1.4] to correct this in line with the Council's proposal at Deadline 2.
14.31	Table 5.1	Article 37(3) - Buckinghamshire Council notes that there is a provision requiring notice to be given to them when no consent is required for the transfer of the benefit of the DCO to another party. No similar notice provision is provided where consent is required and the SoS will determine the application for consent. Buckinghamshire Council suggests that a provision requiring notice to be provided to Buckinghamshire Council be included in that circumstance.	Article 37 has precedent in various granted DCOs and intends to ensure that the relevant planning authorities are informed in the event that the benefit of the Order is transferred without the need for Secretary of State consent. However, the Applicant will amend the wording of article 37 to provide for notification to the Council in the event that Secretary of State consent is required at Deadline 2.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
14.32	Table 5.1	Article 37(4) - Buckinghamshire Council raises a typographical error within the current sentence saying “ <i>State, the relevant planning authorities</i> ” as it should rather say “ <i>State and the relevant planning authorities</i> ”.	The Applicant agrees there is a minor typographical error in the wording of article 37(4) as identified by the Council and has updated the Draft DCO [EN010158/APP/3.1.4] to correct this at Deadline 2.
14.33	Table 5.1	Schedule 1, Works 1A – Buckinghamshire Council suggests adding an “ <i>and</i> ” after the semi-colon in sentence “ <i>mounting structure;...</i> ”.	The Draft DCO does not include a Work No. 1A but the Applicant assumes that the Council is referring to limb (a) of Work No. 1, “ <i>solar PV modules fitted to mounting structures</i> ”. The Applicant has updated the Draft DCO [EN010158/APP/3.1.4] to reflect additional “and” connecting limbs (a) and (b) at Deadline 2.
14.34	Table 5.1	Schedule 1 – Within the final paragraph it is currently stated “ <i>and further associated...</i> ”, Buckinghamshire Council would like to highlight that a similar provision is currently the subject of a judicial review in relation to the Gatwick Airport DCO. Buckinghamshire Council notes that framing of this provision may need to be considered dependent on the pending judicial review.	The wording at the end of paragraph 2 of Schedule 1 authorises “ <i>further associated development</i> ” to the extent that such development is “ <i>unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement</i> ”. This wording is well precedented and consistent with wording appearing in other consented DCOs, including the Longfield Solar Farm Order 2023, the Gate Burton Energy Park Order 2024 and the Mallard Pass Solar Farm Order 2024, which have not been subject to challenge. It is also in the Springwell Solar Farm Order 20206 and the Fenwick Solar Farm Order 2026, which are very recent precedent. In addition, the Explanatory Memorandum [EN010158/APP/3.2.3] , at sections 5.1 and 1.6, contains extensive explanation of the mechanisms that have been built into the Draft DCO to ensure that the built form of the Authorised Development does not exceed the basis of assessment within the Environmental Statement. The Applicant is therefore confident that this wording is acceptable and appropriate.
14.35	Table 5.1	Schedule 2, Requirement 4 – Buckinghamshire Council raises concerns about the exclusion of all of Works No.9 from the detailed design provision. Buckinghamshire Council assumes Works No.8 is not included as the works are temporary, but further explanation around this would be appreciated.	As explained in the Explanatory Memorandum [EN010158/APP/3.2.3] at section 4.2.2, and above, Work No. 9 (works to facilitate Work Nos. 1 to 8 and 10, being highway works including highway improvements and creation of accesses) will also be undertaken pursuant to the powers in Part 3 (Streets) of the Order, meaning that it is not necessary for Requirement 4 to also apply to these works. The Applicant has carefully considered each Requirement in Schedule 2 and specifically included Work No. 9 where mitigation or management is needed with respect to Work No. 9. It is the Applicant's view that sufficient controls are in place with respect to this works package. Part 3 of the Draft DCO [EN010158/APP/3.1.4] contains various relevant controls, for example the requirement under article 11(1)(a) for highway works to be completed to the reasonable satisfaction of the highway authority, and the ability under article 16 for agreements to be entered into with the street authority in respect of highway works carried out under powers conferred by the Order. In respect of Work No. 8 (temporary construction and decommissioning compounds in connection with Work Nos. 1 to 7, 9 and 10), it is confirmed that this is not included within the scope of Requirement 4 on the basis that these works are temporary and not of a nature requiring approval of the matters specified under Requirement 4.
14.36	Table 5.1	Schedule 2, Requirement 5 – Buckinghamshire Council request that a provision be added that grants Buckinghamshire Council the power to elect to nominate a representative to be part of the Community Liaison Group.	Requirement 5 provides that terms of reference for the Community Liaison Group are to be submitted to the planning authority for approval prior to commencement of the Proposed Development. As such Buckinghamshire Council will have the opportunity to require the power to nominate a community liaison group representative at that stage.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response
14.37	Table 5.1	Schedule 2, Requirement 18 – Buckinghamshire Council would welcome further clarity from the Applicant on how decommissioning is secured in all circumstances (e.g. if the person or body that benefits from the DCO became unable to fulfil the requirements for whatever reason).	The controls that apply to decommissioning of the Proposed Development operate in an equivalent manner to all controls secured under the DCO. Requirement 18 imposes a maximum operational lifetime for the Proposed Development (i.e. the timeframes within which decommissioning must take place) and secures the implementation of a detailed Decommissioning Environmental Management Plan, the terms of which are subject to the planning authority's approval. Were the undertaker of the Proposed Development to fail to decommission within the required timescales, or to fail to do so in accordance with a detailed Decommissioning Environmental Management Plan, this would constitute a breach of the DCO. It is a criminal offence under the Planning Act 2008 not to comply with the requirements of a DCO, and the Applicant considers that the Proceeds of Crime Act 2002 acts as a further deterrent to such a breach given that the solar infrastructure would represent a valuable asset for the Applicant.
14.38	Table 5.1	Schedule 2, Requirement 18(2)(a) – Buckinghamshire Council raises a typographical error, noting that where it says " <i>requirement 3</i> " this should be " <i>requirement 2</i> ".	Requirement 18 does not include a limb (2)(a) but the Applicant assumes that the Council intended to refer to limb (1)(a). The Applicant agrees there is a minor typographical error in the wording of Requirement 18(1)(a) as identified by the Council and has updated the Draft DCO [EN010158/APP/3.1.4] to correct this at Deadline 2.
14.39	Table 5.1	Schedule 16 – Buckinghamshire Council raises that they would welcome a discussion between them and the Applicant to discuss the timings and fees provided in Schedule 16.	The Applicant is happy to discuss this matter further with the Council through its ongoing engagement as part of the Statement of Common Ground process. However, the Applicant would note that, as outlined in the Explanatory Memorandum [EN010158/APP/3.2.3] at section 5.16, the drafting of Schedule 16 has had regard to Appendix 1 of the Planning Inspectorate's Advice Note 15, but also reflects a bespoke approach informed by the Applicant's experience with discharging commitments in practice on other projects. In respect of timings under paragraph 2(2), Appendix 1 of Advice Note 15 provides for a decision period of 42 days (six weeks), but the Applicant has deemed it appropriate to extend this to eight weeks. In respect of fees, paragraph 5 confirms that these are as prescribed by the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012.
14.40	Table 5.1	New addition – In the highways section of the LIR, the Council (as Highways Authority) addresses the process for temporary traffic regulation orders and adoption of works. While the Highways Authority welcomes the principles identified by the Applicant, they do not enable a bond to be taken through a s.278 HA 1980 agreement, which allows the Highway Authority to safeguard against works that do not meet adoptable standards. The Highway Authority requires a similar this provision within the draft DCO.	This commitment is already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.11.

Appendix 1

Letter to Buckinghamshire Council on BESS locations



Rosefield Energyfarm Limited
Alexander House
1 Mandarin Road
Rainton Bridge Business Park
Sunderland
DH4 5RA

Buckinghamshire Council
Planning and Building Control
The Gateway Offices
Gatehouse Road
Aylesbury
HP19 8FF

3 February 2026

Dear [REDACTED],

Rosefield Solar Farm – Commentary on Buckinghamshire Council’s Relevant Representation with Regard to the Location of the Battery Energy Storage System

Introduction

On review of Buckinghamshire Council’s Relevant Representation, Rosefield Energyfarm Limited (‘the Applicant’) notes that Buckinghamshire Council have raised ‘three key strands’ which are informing the Council’s inability to support Rosefield Solar Farm (the ‘Proposed Development’).

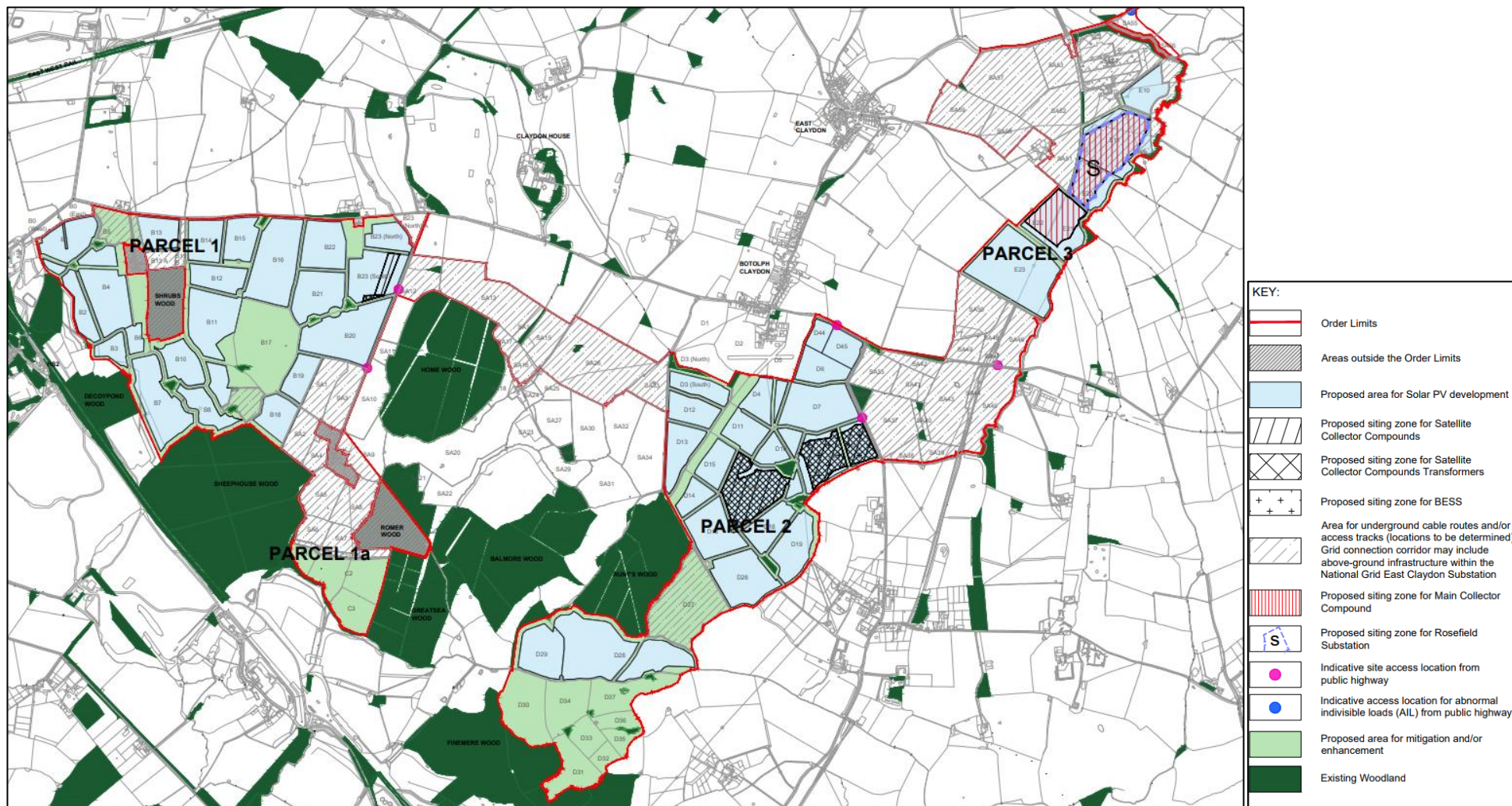
Strand three of Buckinghamshire Council’s Relevant Representation is the focus of this letter. Under this strand, Buckinghamshire Council state that “*the Council considers key changes should be made to the scheme, including moving the battery energy storage system*”. I note that you also raised this as one of Buckinghamshire Council’s key concerns at the monthly Planning call on 4 December 2025.

The Applicant thinks it would be helpful to set out, in one place, the design rationale and amendments to the location of the Battery Energy Storage System (BESS) for your information. The remainder of this letter has used the consultation process and key consultee comments as a frame for the design timeline.

At the point of submitting the DCO Application, the proposed location of BESS has been limited to Fields D8 and/or D9 in Parcel 2. These correspond to Work No. 4 as depicted on Sheet 6 of the **Works Plans [EN010158/APP/2.3.2] [AS-006]**).

For ease of reference, a snapshot of **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]** has been provided for as **Figure 1** below.

Figure 1: Zonal Masterplan Extract



Summary of the BESS design rationale leading up to Phase One Consultation

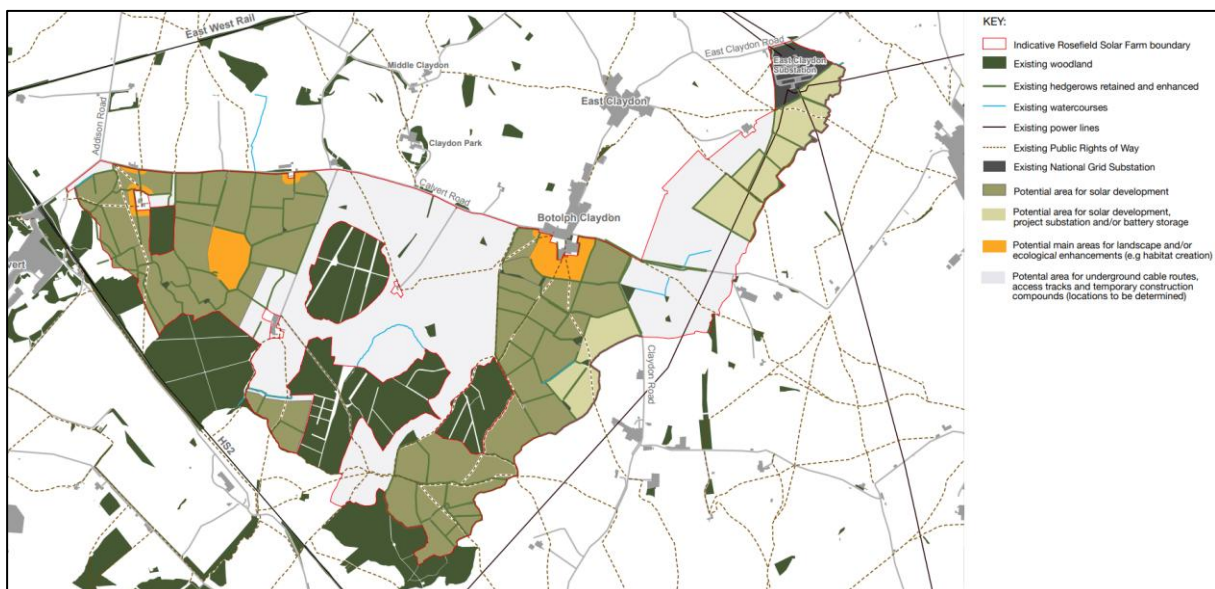
During the early design stages of the Proposed Development, the Applicant sought to identify suitable fields to locate BESS within. These fields would then be put forward as being potentially suitable for BESS at Phase One Consultation.

The potential areas capable of facilitating BESS were identified based upon the information available to the Applicant at the time and the following factors:

- Proximity to the Grid Connection;
- Proximity to and visual impact on the residential settlement of Botolph Claydon;
- Proximity to Claydon Road/East Claydon Road to allow AIL traffic to avoid passing through villages;
- Extent and magnitude of potential impacts on the setting of the Botolph Claydon Conservation Area;
- Extent and magnitude of views from Quainton Hill;
- Located outside areas of flood risk;
- Proximity and impact on nearby dwellings; and
- Proximity and location of PRoW, particularly the Bernwood Jubilee Way running through Parcel 2.

With the early design works concluded, BESS was identified as being potentially suitable in the light green fields in **Figure 2** below. The below figure formed the Applicant's early design which was consulted on during the Phase One Consultation.

Figure 2: Phase One Consultation - Our Early Design



The application of the above factors and the identification of potentially suitable fields for BESS is explained in detail through the **Design Approach Document (DAD) [EN010158/APP/5.8] [APP-038]** (see paras. 5.3.10 to 5.3.12). The DAD also sets out the factors which influenced the early design works. It does so by providing the reasons why certain fields had been considered suitable for BESS whilst others were not.

Summary of the BESS' design rationale leading up to Phase Two Consultation

Following the Phase One Consultation, the early design was revisited and revised. This design revision took account of:

- consultation feedback;
- the emerging results from environmental studies;
- on-going technical work (such as noise and flood risk assessments); and
- further targeted engagement with statutory consultees and stakeholders.

During this period of design review, several technical design workshops took place with key consultees. In particular, flood risk (fluvial and pluvial) considerations and ecological surveys helped to inform design discussions with key consultees.

The **DAD [EN010158/APP/5.8] [APP-038]** recognises the key factors and works which influenced the reassessment of suitable locations for BESS at this stage. These factors included: sight of updated information regarding the proposals for the National Grid East Claydon Substation; results from a preliminary landscape and visual assessment; results from a residential visual amenity assessment; and a noise assessment.

The preliminary landscape and visual assessments, noise assessment and other considerations had served to rule out the suitability of Fields D18 and D19 in Parcel 2 from BESS development (see para. 5.4.16 of the **DAD [EN010158/APP/5.8] [APP-038]**). The assessments and the wider considerations listed above also served to rule out the suitability of Fields E10, E11 and E20 - E22 in Parcel 3 from BESS development. With the above in mind, and for fullness, **Table 1** below provides a Field-by-Field review of the reason(s) why fields in Parcel 3 had been discounted from BESS development

Table 1: Reasons for discounting fields for BESS development

Field Number	Reason(s) why BESS development was discounted
E22	- Proximity to Sion Hill Farm and associated noise and visual impacts. - Offset requirements from overhead lines and pylons transecting the Field.
E21	- Presence of higher flood risk areas. - Offset requirements from overhead lines and pylons transecting the Field too.

E20	- Proximity to Sion Hill Farm and associated noise and visual impacts. - Offset requirements from overhead lines and pylons transecting the Field.
E11	- Proximity to Sion Hill Farm and associated noise and visual impacts. - Offset requirements from overhead lines and pylons transecting the Field. - Presence of higher flood risk areas.
E10	- Presence of higher flood risk areas. - Offset requirements from overhead lines and pylons transecting the Field.
SA51	- Proximity to Sion Hill Farm and associated landscape and visual and noise impacts. - One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation (prior to the Phase Two Consultation), to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus further precluding the consideration of BESS development.
SA52	- Proximity to Sion Hill Farm and associated landscape and visual and noise impacts. - One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation (prior to the Phase Two Consultation), to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus further precluding the consideration of BESS development.
SA53	- One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation prior to Phase Two Consultation, to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus precluding the consideration of BESS development.
SA54	- This Field wholly contains the existing National Grid East Claydon Substation.
SA55	- This Field is included within the Order Limits for the provision of the AIL access. - Presence of higher flood risk areas.
SA56	- This Field is included within the Order Limits for the provision of the AIL access. - Presence of higher flood risk areas.

SA57	- One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation prior to Phase Two Consultation, to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus precluding the consideration of BESS development.
SA58	- Proximity to Sion Hill Farm and associated landscape and visual and noise impacts. - One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation (prior to the Phase Two Consultation), to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus further precluding the consideration of BESS development.
SA59	- One of six Fields where the Order Limits were extended to the west of the existing National Grid East Claydon Substation prior to Phase Two Consultation, to facilitate the Grid Connection Cable Corridor. Assumption that some, or part, of the new National Grid East Claydon Substation could be located within this Field thus precluding the consideration of BESS development.

As a result, the options of fields suitable for BESS were refined to Fields D8 and D9 in Parcel 2, and E23 in Parcel 3.

Adding further pressure to BESS development in Field E23 in Parcel 3 was the fact that the design requirements for the Rosefield Substation had been narrowed to either Field E11 or E23 in Parcel 3. This meant that Field E23 was under particular spatial and developmental pressure, being identified as potentially containing both the Rosefield Substation and BESS.

At Phase 2 Consultation, two options were presented for the location of the Rosefield Substation but, across both options, the BESS siting zone comprised Fields E23, D8 and D9. This can be seen in **Figures 3.1** and **3.2** below:

Figure 3.1: Zonal Masterplan Scenario 1

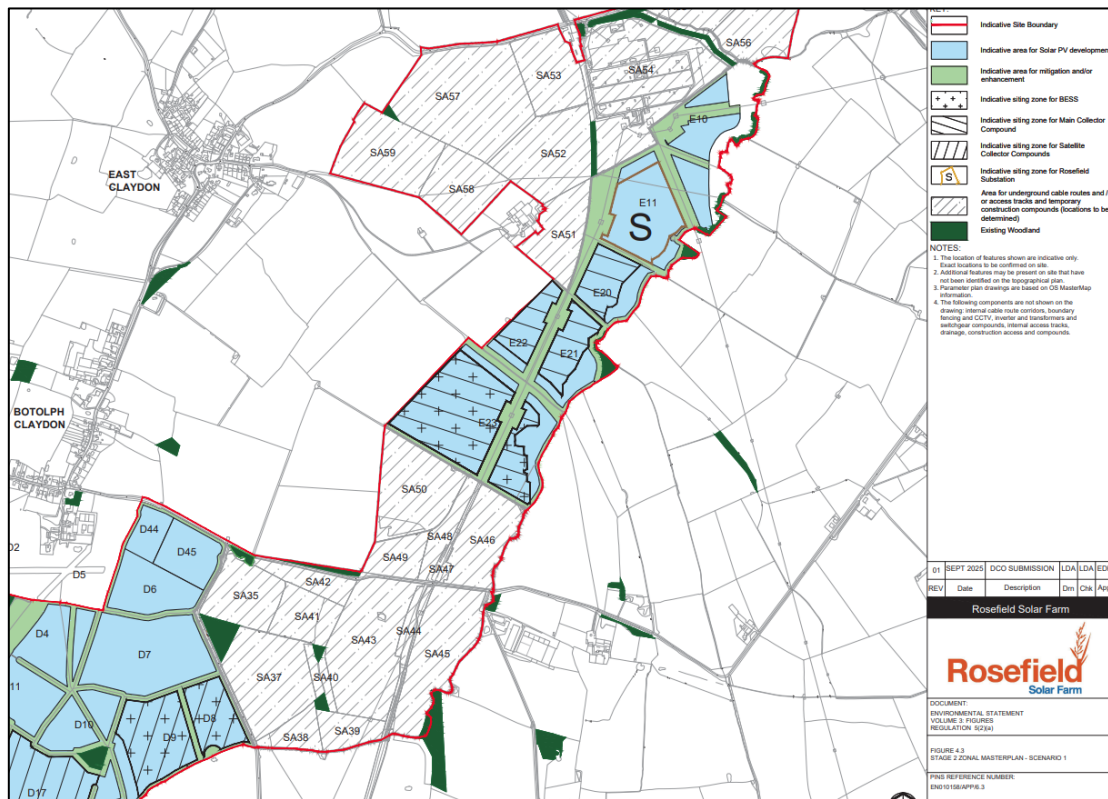
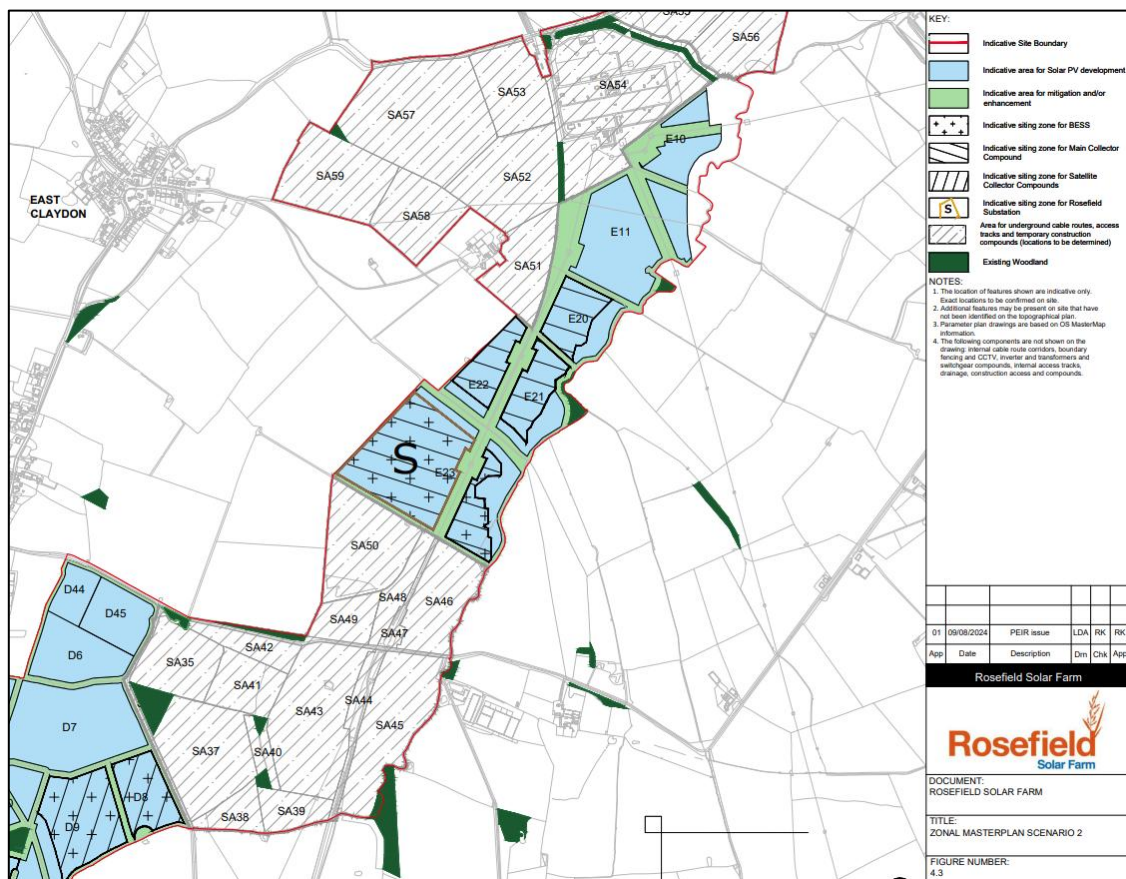


Figure 3.2: Zonal Masterplan Scenario 2



Suitable locations for the BESS were further restricted by a number of committed and embedded environmental mitigation measures. Table 5.2 of the PEIR details these. The most notable commitments were that:

1. a minimum 250 m offset from the fence line around the BESS to residential properties should be maintained (determined on a case-by-case basis, but always at a minimum offset distance of 250 m); and
2. the siting of BESS would be outside of Flood Zone 2 and Flood Zone 3.

In response to the Applicant's presented Phase Two Consultation design, Buckinghamshire Council commented that one of the most significant details that remained to be confirmed included (...) the "*siting of the Battery Energy Storage System (BESS)*".

Summary of the BESS' design and location during the Targeted Consultation

Post Phase Two Consultation, the Applicant continued to carry out further assessments, surveying and investigative works. These works, together with a review of the consultee comments on the Phase Two Consultation design, led the Applicant to undertake a Targeted Consultation on minor design amendments.

The main amendment put forward in the Targeted Consultation was the reduction of the BESS siting zone to Fields D8/D9 only, with Field E23 removed from consideration from BESS. The decision as to which single location was preferable was guided by Phase Two Consultation, including:

- Feedback regarding views from Botolph Claydon and East Claydon into Parcel 3; and
- Feedback from TCS Biosciences Ltd noting how BESS in Parcel 3 would cause disruption to their organisation.

Taking into account the above feedback, the design was amended and the option for BESS was removed from Field E23 in Parcel 3. BESS was now solely proposed in Parcel 2 (Fields D8 and D9).

There were also other benefits associated within the consolidation of the BESS location to only Parcel 2.

Firstly, the removal of BESS from Field E23 in the Targeted Consultation served to reduce the overall number of 'larger elements' in Parcel 3. This saw a reduction of 11.43 hectares to the total area available for BESS development. Consequentially, the removal positively enabled **ES Chapter 10: Landscape and Visual** [EN010158/APP/6.2] [APP-053] to conclude that "*no significant adverse effects are reported on the visual amenity of residents of Botolph Claydon or any other settlement in the Order Limits*". Therefore, had BESS development been retained in Field E23, significant residual landscape and visual adverse effect(s) would have been reported. This is explained further in both Appendix J of the **Consultation Report Appendices** [EN010158/APP/5.2] [APP-029] and the **DAD** [EN010158/APP/5.8] [APP-038].

Secondly, the BESS' single location in Parcel 2 would positively result in less cut and fill being required (compared with Field E23). Furthermore, in landscape and visual terms, BESS located in Parcel 2 would be 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 **DAD [EN010158/APP/5.8] [APP-038]**.

With the above in mind, the Targeted Consultation sought views on the proposed location of BESS in Parcel 2 only and the removal of Field E23 from consideration.

Figure 3: Targeted Consultation - Our updated operational layout



Buckinghamshire Council responded to this consultation and comments were limited to matters of noise and vibration concerns and a wider and increasing concern for 'cumulative noise impacts in the wider area' with there being two other BESS developments proposed in proximity to the National Grid East Claydon Substation.

Buckinghamshire Council's response also recognised the BESS location had been confirmed through this consultation but that there was a maintained concern with cumulative developments.

Summary of the BESS' design evolution

The Applicant considers that the consultation process has been beneficial to the overall design of the Proposed Development and to the consolidation of BESS development within Parcel 2.

Buckinghamshire Council's comments guided the Applicant to critically consider and consolidate the location of BESS. Further, comments from members of the public, and TCS Biosciences Ltd guided the rationalisation of the BESS to Parcel 2. These comments, alongside ongoing assessments, surveys and a consideration of effects (as evidenced in **ES Chapter 10: Landscape and Visual [EN010158/APP/6.2] [APP-053]**) have made it clear that the removal of potential BESS from Parcel 3 only

serves to reduce the potential environmental impacts and has enhanced the overall design of the Proposed Development.

The Applicant is confident that the location of and design rationale guiding the BESS to Parcel 2 is suitable, and that reasonable alternatives have been considered, in consultation with key stakeholders and wider public consultation.

Yours sincerely,

Naomi Heikalo

Project Development Manager

On behalf of Rosefield Energyfarm Limited

Appendix 2

Cumulative Waste Study



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1. Cumulative Waste

1.1. Introduction

- 1.1.1. This document was originally submitted as Appendix 1 to the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and has been updated at Deadline 2 following the amendment to the amount of anticipated waste generated by the Proposed Development as detailed in **ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2]** in response to the Local Impact Report. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [EN010158/APP/1.2.7]** for the list of current versions of documents.
- 1.1.2. 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.
- 1.1.3. 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. This is consistent with the Buckinghamshire Local Plan¹, which recognises that cross-boundary movements of waste currently occur with adjoining and wider areas.

¹ https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/buckinghamshire-minerals-and-waste-local-plan-2016-2036_yiYUGSb.pdf

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 East².

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. In addition, the Buckinghamshire Local Waste Plan does not provide specific projections of future landfill capacity over the relevant study period.
- 1.4.3. This study operates under the assumption that future landfill void capacity will remain comparable to current levels. Additionally, it is assumed that the Waste Planning Authority will plan and allocate sufficient landfill 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 during construction 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, 35% of total waste

² [Remaining Landfill Capacity - data.gov.uk](https://data.gov.uk)

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/6.2.3]** 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	108,744	128,691
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	469	27,211	104,234	131,445

Cumulative Waste at Decommissioning

Cumulative Waste			
Total waste from cumulative schemes	27,211	122,234	149,445
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	76,3977	164,1474
Waste to landfill, m ³ (realistic worst case estimate with 70% recovery)	26,333	22,919	49,2538
Waste to landfill, m ³ (absolute worst-case estimate - assuming zero recycling/recovery)	87,777	76,3977	164,174

Scheme	Size (MW)	Estimated PV Panel waste (tonnes)	Estimated Other waste (tonnes)	Estimated Total waste (tonnes)
--------	-----------	-----------------------------------	--------------------------------	--------------------------------

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	67,965	132,310
Waste to landfill, m3 (realistic worst case estimate with 70% recovery)	19,304	22,390	39,694
Waste to landfill, m3 (absolute worst-case estimate – assuming zero recycling/recovery)	64,245	67,965	132,310

Current Baseline

Regional landfill capacity (m3) ³	41,544,623
Regional C&D waste arisings (tonnes) ⁴	4,262,557
Buckinghamshire waste arisings (tonnes) ⁵	2,633,913

Comparison Against Current Baseline - Rosefield	PV panel waste (%)	Other waste (%)	Total waste (%)
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³ Environment Agency (2025) '2024 Remaining Landfill Capacity' Available online at: [Remaining Landfill Capacity - data.gov.uk](https://data.gov.uk/dataset/remaining-landfill-capacity)

⁴ Environment Agency (2025) '2024 Waste Data Interrogator' Available online at: [2024 Waste Data Interrogator - data.gov.uk](https://data.gov.uk/dataset/2024-waste-data-interrogator)

⁵ Environment Agency (2025) '2024 Waste Data Interrogator' Available online at: [2024 Waste Data Interrogator - data.gov.uk](https://data.gov.uk/dataset/2024-waste-data-interrogator)

Scheme	Size (MW)	Estimated PV Panel waste (tonnes)	Estimated Other waste (tonnes)	Estimated Total waste (tonnes)
% of regional landfill capacity required for Proposed Development (realistic worst case estimate with 70% recovery)		0.05	0.05	0.10
% of regional landfill capacity required for Proposed Development (absolute worst case estimate)		0.15	0.16	0.31
% of regional C&D waste arisings		0.45	0.05	0.50
% of Buckinghamshire C&D waste arisings		0.73	0.77	1.50
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	0.06	0.12
% of regional landfill capacity required for cumulative solar schemes (absolute worst-case estimate)		0.21	0.18	0.39
% of regional C&D waste arisings		0.62	0.54	1.16
% of Buckinghamshire C&D waste arisings		1.00	0.87	1.87

1.7. Summary

- 1.7.1. The study demonstrates that under the absolute worst-case scenario, cumulative impacts would result in 0.39% of regional landfill capacity to be required for the Proposed Development and other existing development and/or approved developments. Under the realistic worst case 0.12% 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 0.39% waste arising in the South East and 0.62% 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.
- 1.7.5. The Applicant will continue to engage with Buckinghamshire Council regarding landfill capacity throughout the construction, operation (including maintenance) and decommissioning phase, to ensure that appropriate waste management arrangements remain in place.



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