Rosefield Solar Farm

Applicant's Response to Written Representations

EN010158/APP/8.12
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 Written Representations (WRs) received at Deadline 1 in respect of the proposed Rosefield Solar Farm (the 'Proposed Development').

1.1.2. Due to the breadth of submissions made at Deadline 1, the Applicant has provided this standalone response to the WRs submitted by Interested Parties.

1.2. Structure

1.2.1. This Report is divided into several topic tables which have been structured to accord with the Principal Issues noted in Annex C of the Examining Authority's Rule 6 Letter **[PD-008]**.

1.2.2. Under each topic matter, which is listed out chronologically in accordance with the Principal Issues, a sub set of three tables have been provided for. These tables seek to divide and combine WRs according to whether:

- The Interested Party making the WR is one that the Applicant is engaging in a SoCG;
- The Interested Party is an 'other public authority or key organisation' that is not engaging with the Applicant through a SoCG; or
- The Interested Party is an 'other interested party' that does not fall under the above two categories.

1.2.3. Each distinct table in this Report is broken down further by embedded sub headings which reflect, as appropriate, the sub-items listed in the table of Annex C of the Examining Authority's Rule 6 Letter **[PD-008]**.

1.2.4. The above approach is intended to set out a straightforward format for the Applicant to address WRs, in accordance with the structure of the Principle Issues identified by the Examining Authority.

1.2.5. The Applicant notes that the Environment Agency's WR **[REP1-122]** did not contain substantive comments for the Applicant to respond to and so it does not feature in the tables below.

1.3. Approach

1.3.1. In order to best capture the issues raised by Interested Parties through WRs, the Applicant has sought to provide itemised summarisations of the WRs so that the Applicant can best respond to points in turn.

1.3.2. To enable Interested Parties to compare the Applicant's summarisations with their WRs, the Applicant has provided page and paragraph references directly back to the WR that is being summarised. For Interested Parties that fall within the 'other interested party' tables and to avoid repetition, these WRs have been grouped using thematic analysis.

2. Applicant's Thematic Responses

Table 1-1: Need, Site Selection and Alternatives (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
1.1.1	National Grid Electricity Transmission (NGET) Limited (Para. 2.4)	Comment noting that NGET is balancing site constraints with the design requirements of the New Substation. Further comment noting that the land acquisition strategy has therefore been proportionate in delivering the East Claydon Project with comment requesting the Applicant takes a similar approach to establish a collaborative approach.	The Applicant notes this comment. The Applicant is confident that the DCO Application (as submitted) contains sufficient flexibility for the final siting of works to construct and maintain NGET's infrastructure to ensure that, regardless of the final design for the East Claydon Project, the Proposed Development would not prejudice the delivery of NGET's works and would also itself remain deliverable. The Proposed Development would be designed to take account of NGET's statutory obligations to both construct and maintain their assets and that doing so would remove any perceived or actual conflicts across all phases of the development of the two projects. The Applicant is working this through with NGET through the tailoring of protective provisions alongside any cooperation agreement required. The Applicant and NGET have held several meetings to date and are looking to hold further meetings, such as a design workshop.
1.1.2	CSAG (CSAG) (Pages 5, 9 and 25, Paras. 19, 20, 41, 111 and 112)	Comment noting significant concerns with the Applicant's approach to site selection. Further comment noting that it appears no other site was considered for the Proposed Development in the Reasonable Alternatives Considered Chapter of the Environmental Statement and that site selection was framed by a preliminary grid connection and the identification of a nearby landowner.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [**REP1-016**]) presents the reasoning why the Proposed Development is located in the Site's particular location. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [**APP-047**] sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [**REP1-016**]) presents the reasoning why the Proposed Development is located in the Site's particular location. As set out in Section 4.2 of the Report, a viable grid connection is an essential requirement for proceeding with a development and is instrumental in defining the Search Area. The Search Area was based on the availability of a suitable grid connection at the National Grid East Claydon Substation, with sufficient capacity available to support a solar scheme of a viable size. A site closer to the substation was preferred on the basis that a shorter cable route has benefits in terms of ease and timeliness of the delivery of key infrastructure, minimising disruption to residents and businesses along the route, and minimising environmental disturbance and cost. Minimising the number of landowners is beneficial for a number of reasons, including; simplifying land negotiations, reducing the risk of project failure due to added complexity of multiple landowners, reducing the number of affected parties, and reducing reliance on compulsory acquisition, in accordance with policy requirements. 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 SoS (SoS) *"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"*. Furthermore,

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Paragraph 4.3.9 of NPS EN-1 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 in recent Examining Authority Reports of Findings and Conclusions and Recommendation to the SoS, the planning balance should be framed against the need of the Proposed Development, the effects (beneficial and adverse) concluded within the ES, any other material considerations and the relevant legislative test(s); such as compulsory acquisition.
1.1.3	CSAG (Page 6 and 19, Paras. 21, 22 and 86 and Page 51, Para. 4)	Comment noting that there is no evidence or information as to how the Order Limits were selected by the Applicant. Further comment noting that whilst the Applicant claims to have carried out a search for sites within 10km of the East Claydon substation, no other sites are identified.	The Applicant disagrees. As noted above and as detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), the location and design of the Proposed Development is the result of a comprehensive site selection process that considered environmental, technical and planning issues to avoid potential impacts of the Proposed Development.
1.1.4	CSAG (Page 6, Para. 23)	Comment noting that the Reasonable Alternatives Considered Chapter of the Environmental Statement is a retrospective justification for selection of the Order Limits.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]) presents the reasoning why the Proposed Development is located in the Site's particular location. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process.
1.1.5	CSAG (Pages 8, 26 and 48, Paras. 30, 31, 32, 115 and 216 and Page 52, Paras. 8 and 9)	Comment noting that no evidence has been provided by the Applicant regarding how the application of the mitigation hierarchy has played a part in the avoidance of adverse impacts during site selection. Further comment noting examples such as: • Fields B6, B7 and B8 which Natural England proposes to designate as a Site of Special Scientific Interest for the protection of the Bechstein's bat colonies; and • Other interest and Fields B2-B11, B18-B20 and D28 and D29 which are within the Core Sustenance Zone for Bechstein's bats. Further comment that the significant impacts of the Proposed Development are not truly residual since the Applicant is considered to have disregarded the first stage of the mitigation hierarchy.	The Applicant disagrees with the CSAG's position. As detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), the location and design of the Proposed Development is the result of a comprehensive site selection process that considered environmental, technical and planning issues to avoid potential impacts of the Proposed Development. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process. This process has been undertaken in accordance with the mitigation hierarchy and if development on fields could not be avoided, mitigation measures have been proposed that directly respond to the key constraints in the surrounding area. Detail of this is set out in each technical chapter presented in the ES. **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has fully justified how the mitigation hierarchy has been applied and recognised and acknowledges the sensitivity of the local and wider environment. In relation to the comment around protection of bat colonies and the Core Sustenance Zone, in order to further the evidence base how bats, particularly Bechstein's, use the woodland and arable land within and adjacent to the Proposed Development, the Applicant has already undertaken additional studies which was submitted at Deadline 1 (see **Bat Technical Study [EN010158/APP/8.5]** [REP1-105]).

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			A detailed response with regards Fields B2-B11, B18-B20 and D28 and D29 is given within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see RR026 pages 21-23)**
1.1.6	CSAG (Page 9, Para. 35)	Comment noting that a failure to provide information on how the Order Limits were defined means the Applicant has failed to demonstrate how the harms arising from the Proposed Development could have been avoided.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** and **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** provide detail as to how the location and design of the Proposed Development is the result of a comprehensive site selection process that was environmentally, technically and planning-led to avoid and minimise the potential impacts of the Proposed Development. In particular, **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** details how the Proposed Development has undergone an iterative design process. 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.
1.1.7	CSAG (Page 10 and 47, Paras. 41 and 214)	Comment noting that, despite clear guidance in national planning policy, the Reasonable Alternatives Considered Chapter of the Environmental Statement makes no reference to the mitigation hierarchy.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) confirms through Section 2 that there is no standard methodology for the Site selection of solar farms. Notwithstanding this, the Site selection methodology has been informed by guidelines set out in NPS EN-1 (2023) as well as NPS EN-3 (2023), NPS EN-5 (2023), the NPPF (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG (as relevant) (2024) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Meanwhile section 4.7 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** provides evidence of how the Proposed Development has been developed as part of an iterative process which has been informed by the ongoing environmental assessment process and taking into consideration the design principles and controls, feedback and engagement with stakeholders and consultees. This process (as set out fully in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**) has seen, among other things, the continual refinement of areas suitable for Solar PV development in accordance with the mitigation hierarchy.
1.1.8	CSAG (Pages 10 and 11 Paras. 42, 43 and Page 47, Para. 215)	Comment that neither the Site Selection Report nor the Reasonable Alternatives Considered Chapter of the Environmental Statement (as referenced by the Planning Statement) indicate any application of the mitigation hierarchy. Further comment that the Site Selection Report describes how the Proposed Development was designed to reduce or mitigate impacts but that this does not take place at the Site selection frame.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) confirms through Section 2 that there is no standard methodology for the Site selection of solar farms. Notwithstanding this, the Site selection methodology has been informed by guidance set out in NPS EN-1 (2023) as well as NPS EN-3 (2023), NPS EN-5 (2023), the NPPF (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG (as relevant) (2024) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The **Site Selection Report** (**Appendix 1** to 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 sets out that the starting point for the Site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints. The latter mention of environmental and planning constraints reflects the way in which, at the Site selection frame, the Applicant has had regard for the first stage in the application of the mitigation hierarchy which is best reflected in Section 2.5 of **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045].** This chapter confirms that the Site itself does not overlap any environmental designations, except for the where the Order Limits encroach into Romer Wood and Greatsea Wood (further detail below) and Quainton-Wing Hills Area of Attractive Landscape which sits in the southern part of Parcel 2. This demonstrates the Applicant's successful application of the avoidance stage of applying the mitigation hierarchy to the Site selection process. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** sets out the design evolution process and alternatives that have been considered from the start of the identification of the Order Limits throughout the design development process. This process has been undertaken in accordance with the mitigation hierarchy and if fields could not be avoided, mitigation measures have been proposed that directly respond to the key constraints in the surrounding area. Detail of this is set out in each technical chapter presented in the ES.
1.1.9	CSAG (Page 11, Para. 44)	Comment noting that the Applicant has not shown how any other site, including that within the landowner's control, was considered or rejected to avoid harms, in accordance with Paragraph 5.4.42 of NPS EN-1.	The **Site Selection Report** (**Appendix 1** to 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 report sets out the logical approach taken to inform the Site selection process, starting from the point of connection at the National Grid East Claydon Substation, and using the criteria set out in section 2.10 of NPS EN-3 (2023). The search identified a single landowner, located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection. Discussions with other landowners in the area did not identify any alternative sites which met the Site selection criteria, either because they were not interested in offering their land for solar development, or because they were pursuing alternative proposals on their land.
1.1.10	CSAG (Page 11, Para. 46)	Comment noting disagreement with the Applicant's claim that the search criteria established within NPS EN-3 has been accorded with. Further comment noting that key sections were disregarded, such as that topography plays an important role in irradiance.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) confirms through Section 2 that there is no standard methodology for the Site selection of solar farms. Notwithstanding this, the Site selection methodology has been informed by guidance set out in section 2.10 of NPS EN-3 (2023) as well as NPS EN-1 (2023), NPS EN-5 (2023), the NPPF (2024), the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG (as relevant) (2024) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Furthermore, Sections 3 and 4 of the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) specifically reference 'irradiance and site topography' as an influencing factor in the Proposed Development's site selection process.
1.1.11	CSAG (Page 11, Paras. 47 and 48)	Comment rebutting the Applicant's wording in Paragraph 4.3.2 of the Reasonable Alternatives Considered Chapter of the Environmental Statement which notes the 'existence of sufficient land to deliver the project and meet	The Applicant notes this comment and reconfirms that this is a core attribute derived from the wording within the NPS EN-3 (2023). For example, Paragraph 2.10.17 recognises that a *"solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary*

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		the scale of the Proposed Development' is one of three core attributes which large-scale solar developments require.	*significantly depending on the site".* It is therefore important that there is the existence of sufficient land to deliver the project and meet the scale of the Proposed Development.
1.1.12	CSAG (Page 12, Para. 50)	Comment noting that the Applicant's wording in Paragraph 4.3.2 of the Reasonable Alternatives Considered Chapter of the Environmental Statement only identifies two of the seven factors influencing site selection and design, as written into NPS EN-3.	The Applicant notes this comment and confirms that, as written into **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**, other considerations are recognised beyond the three fundamental core attributes detailed. These are explained further though section 4.4. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) recognises, through section 3, the seven factors influencing site selection.
1.1.13	CSAG (Page 12, Para. 52 and 53)	Comment noting that the Applicant's Reasonable Alternatives Considered Chapter of the Environmental Statement does not identify other sites that were tested against the seven factors influencing site selection and design, as written into NPS EN-3. Comment that the Site Selection Report lists the seven factors written into NPS EN-3 but that the Report does not apply these to any other sites than the Order Limits.	The Applicant notes this comment and confirms that, as written into **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**, further detail can be found in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) as it sets out in more detail the Site selection process undertaken by the Applicant to identify the location of the Proposed Development. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** presents the Applicant's due consideration for environmental constraints which during the Site selection process, 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 (PRoWs); • 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 lens, • Security and lighting.
1.1.14	CSAG (Page 13, Para. 55)	Comment that the Applicant's review of the Brownfield Register held by Buckinghamshire Council does not present genuine options as this register is kept to identify sites for residential development, not for the type of development proposed.	The Applicant acknowledges this comment and notes that the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** recognises the emphasis NPS EN-3 (2023) places on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. With regard for Buckinghamshire Council's Brownfield Register, the Applicant recognises this is a single data set that can serve to identify the largest brownfield sites within the

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			Buckinghamshire Council area. Whilst identified for the benefit of housing, there is nothing precluding the coming forward of such brownfield sites for other uses, where that use can be made acceptable on site.
1.1.15	CSAG (Page 13, Para. 56)	Comment noting the Proposed Development's need for long interconnecting routes which may potentially increase the Proposed Development's impact, compared with a more compact site. Further comment noting that the Environmental Statement does not explain why other parts of the Order Limits (for example, the Fields between SA35 and SA50) are not allocated for infrastructure as these are lower lying that most of those proposed for solar PV.	The Applicant disagrees with this assessment of the Site's makeup. Comparative to other solar NSIP projects approved by the SoS, the Proposed Development is relatively compact in that the Parcels which make up the Proposed Development are in closer proximity to one another than in other solar NSIP projects which are more dispersed. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** presents the reasoning why the Proposed Development is located in the Site's particular location. As set out in Section 4.2 of the Report, a viable grid connection is an essential material consideration for proceeding with a development and is instrumental in defining the Search Area. The Search Area was based on the availability of a suitable grid connection at the National Grid East Claydon Substation, with sufficient capacity available to support a solar scheme of a viable size. With regard for Fields SA35 to SA50 and as noted in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**, these areas were not made available by the landowner to the Applicant for any development, apart from any required underground cabling and access routing and given the landowner unwillingness it was not, given the availability of alternative land, considered to be necessary to seek to use compulsory powers to acquire it.
1.1.16	CSAG (Page 13 and 14, Paras. 57 and 58)	Comment pointing to Paragraph 4.3.7 of the Site Selection Report with further comment going on to note that the Applicant decided the ease of reaching agreement with a single landowner over-rode any other consideration. Further comment noting that this approach does not explain why the Order Limits were identified from within the Claydon Estate's ownership.	The Applicant notes this comment but disagrees with the comments made. The Applicant did not decide that any ease of reaching agreement with a single landowner over-rode other considerations. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** presents the Applicant's due consideration for environmental constraints which during the Site selection process, 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; • PRoWs; • 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 lens, • Security and lighting.

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			The above mention of environmental and planning constraints reflects the way in which the Applicant has had regard for the first stage in the application of the mitigation hierarchy. This application is best reflected in Section 2.5 of **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045].** The chapter confirms that the Site itself does not overlap any environmental designations, except for the where the Order Limits encroach into Romer Wood and Greatsea Wood (further detail below) and Quainton-Wing Hills Area of Attractive Landscape which sits in the southern part of Parcel 2. This demonstrates the Applicant's successful application of the avoidance stage of the mitigation hierarchy to the Site selection process.
1.1.17	CSAG (Page 14 and 15, Para. 62 and Page 52, Para. 11)	Comment noting that it is not clear why any of the land directly farmed by the landowner or proposed for mitigation/compensation to displaced tenants could not have been allocated for development. Further comment noting that tenants were not initially offered land swaps when they were advised that they would have to surrender tenancies.	It is noted that commercial arrangements (including land swaps and/or financial compensation) have been agreed in principle with the majority of affected agricultural landowners and tenants, as detailed at paragraphs 14.8.24 to 14.8.27 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. In all cases heads of terms have been agreed, and in some cases the relevant agreements have been finalised. The landowner has tried to accommodate the tenants either by agreeing a land swap or agreeing a surrender. The negotiation of the terms has been an iterative process which have evolved over time up to the agreement of HoT's.
1.1.18	CSAG (Page 15, Paras. 66 and 67 and Page 53, Para. 13 and Para.15)	Comment noting that the Reasonable Alternatives Considered Chapter of the Environmental Statement lists irradiation as core requirement but makes no reference to topography. Further comment that topography and irradiance are linked and that the Order Limits include relatively steep and sloping ground.	The Applicant agrees that irradiance and topography are closely related. The Applicant disagrees that **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** does not consider topography. Paragraph 4.4.5 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** clearly recognises the interrelationship between irradiance and site topography. The Applicant would also direct CSAG to paragraph 4.1.3 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** which refers readers to the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** which contains more detail on the Site selection process, including consideration of both topography and irradiance.
1.1.19	CSAG (Page 16, Para. 68)	Comment noting that Parcels 1 and 2 are notably undulating and that Parcel 3 is on relatively flat land, as noted in the Design Approach Document, and that the Applicant has not explained why more solar PV is not proposed on the relatively flatter land of Parcel 3.	The Applicant has sought to locate the elements of the Proposed Development, including the Solar PV development, BESS and Rosefield Substation in the most appropriate locations, balancing all relevant environmental considerations. Solar PV development is proposed within Parcel 3, as shown on the **Works Plans [EN010158/APP/2.3.3] [REP1-005]**, which allows the flexibility to include Solar PV development within the areas shown for Rosefield Substation and the Main Collector Compound once the detailed design of these elements has fixed their extents. The **Works Plans [EN010158/APP/2.3.3] [REP1-005]** have taken account of the constraints present within Parcel 3, including the area of flood risk adjacent to the Claydon Brook, proximity to Sion Hill Farm and offsets required from the existing National Grid Overhead Lines. Further Solar PV development has not been considered within the Grid Connection Cable Corridor,

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			Interconnecting Cable Corridor(s) or the Abnormal Indivisible Loads (AIL) access into the Site surrounding Parcel 3 as these are located within the Order Limits for purposes other than Solar PV development.
1.1.20	CSAG (Page 16 and 17, Paras. 70, 71 and 73 and Page 53, Para. 16)	Comment noting that the majority of areas intended for solar PV slopes broadly northward, though CSAG recognise the steepest fields have been set aside for mitigation. Further comment noting the split of fields and their topographical orientations. Further comment noting that some of the most suitable fields (in Parcel 3 in particular) are not proposed for Solar PV.	Sloping land is useful for solar generation and there is flexibility within the fixed parameters to make adjustments at the detailed design stage to account for the topography e.g. the spacing between the rows of the solar PV panels to account for the angle of the sun and inter row shading. This flexibility is part of the optimisation of the Site and contributes to the best use of land available. As set out with the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the topography of the Site has influenced the design of the Proposed Development from the outset. Within Parcel 1, proposed Solar PV development was removed from land on top of Knowl Hill, to ensure Solar PV development would not be located on the highest and most visible area within Parcel 1. Within Parcel 2, fields in the south (Fields D27, D30, D32, D33, D34, D35, D36 and D37) were removed from consideration for Solar PV development due to the topography and visual considerations, which included reducing visibility within the AAL and from the wider landscape. The response to paragraph 68 of the CSAG WR (see **Ref. 1.1.19** above) sets out the Applicants response in relation to Solar PV development in Parcel 3.
1.1.21	CSAG (Page 18, Para. 80)	Comment noting that NESO's evidence shows that the Order Limits are in an area that is oversupplied by solar and thus the Proposed Development is not needed.	The Applicant disagrees with the conclusion reached. The Applicant has been informed that the solar component of the Proposed Development has been prioritised with a Gate 2 Phase 2 connection from NESO. This means that the Proposed Development is a part of the proposed pipeline of projects which has been informed by project readiness and 'strategic alignment'. NESO anticipate that Gate 2 Phase 2 projects will be able to connect between 2031 and 2035. This means that if the Proposed Development was not consented, NESO's pipeline of prioritised projects would not be of a sufficient capacity to meet government's aims, either in the local area or nationally. Further, it is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Specifically, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, it would not be correct to infer from the current policy position, current capacity ranges and NESO's prioritisation, that the need established by NPS EN-1 does not apply to any scheme or component of a scheme which comes forward for planning consent. The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that, to deliver the 2035 FES-derived capacity range for solar generation, the equivalent of approximately one project the size of the Proposed Development would need to be switched on each and every month (upper range) or every other month (lower range) between the end of 2024 and the middle of 2035.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
1.1.22	CSAG (Page 19, Paras. 83 and 84)	Comment noting that the Site Selection Report is wrong to suggest a network connection is the starting point for the Site selection process and that consideration for disruption to local infrastructure, biodiversity and an assessment of cumulative impacts weigh on this process too. Further comment that the Applicant has not provided evidence to suggest that these other factors have been considered.	The Applicant disagrees with the statement that it is wrong to suggest that a network connection is the starting point for the Site selection process. Paragraph 2.10.25 of NPS EN-3 (2023) makes very clear 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".* Moreover, Paragraph 2.10.60 of NPS EN-3 (2023) expressly explains that *"applicants will consider several factors when considering the design and layout of sites, including, proximity to available grid capacity to accommodate the scale of generation"*. As noted in section 2.2 of the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**), the ExA and ultimately the SoS has repeatedly considered it reasonable across other projects to use the point of connection as a starting point for the Site selection process. The Applicant agrees that those other considerations (such as environmental constraints) weigh on this process and due consideration has been had for these matters in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** in taking the Site forward.
1.1.23	CSAG (Page 20, Paras. 87 and 89)	Comment recognising that significant weight may be applied to the need for the solar element of the Proposed Development, having secured a Gate 2 offer, but that significant negative weight should weigh against the Proposed Development with regard for the need of BESS.	The Applicant disagrees with the weighting suggestion proposed. The Applicant has been informed that the BESS component of the Proposed Development has been re-prioritised with a Gate 1 connection from NESO. This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, it would not be correct to infer from the current policy position, current capacity ranges and NESO's prioritisation, that the need established by NPS EN-1 does not apply to any scheme or component of a scheme which currently has a Gate 1 connection prioritisation.
1.1.24	CSAG (Page 21, Paras. 91, 93 and 94 and Page 54, Para. 21)	Comment that the Applicant has not demonstrated that there are no other reasonably available sites that would be further away or have a lesser impact on dwellings. Further comment noting that there is no evidence in the Site Selection Report to support the assertion that the Applicant sought to minimise adverse visual and residential amenity impacts.	Firstly, 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 SoS *"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"*. Furthermore, Paragraph 4.3.9 of NPS EN-1 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. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** considers the likely significant effects upon visual receptors (including residential receptors). Table 10.9 of the chapter highlights the embedded mitigation measures that have been designed into the Proposed Development at the Site level. Further consideration for impacts on dwellings has been had in **ES Volume 4,**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114] which has been prepared to describe the change in views from private residential properties in relation to the Proposed Development. As in recent Examining Authority Reports of Findings and Conclusions and Recommendation to the SoS, the planning balance should be framed against the need of the Proposed Development, the effects (beneficial and adverse) concluded within the ES, any other material considerations and the relevant legislative test(s); such as compulsory acquisition. Secondly, the **Site Selection Report** (**Appendix 1** to 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 report sets out the logical approach taken to inform the Site selection process, starting from the point of connection at the National Grid East Claydon Substation, and using the criteria set out in section 2.10 of NPS EN-3 (2023). Paragraphs 4.2.16 to 4.2.18 of the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** details how the Applicant sought to focus on areas away from the major settlements to ensure there would be sufficient separation between the Order Limits and surrounding towns and villages to minimise adverse visual and residential amenity impacts. 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 (such as the proximity of residential receptors) in the surrounding area. Detail of this is set out in each technical chapter of the ES. Paragraph 5.1.5 of the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** makes clear that the Site selection process sought to avoid sites in close proximity to residential dwellings. The Report goes on to detail that, having sought to avoid impacts, the Proposed Development sought opportunities to mitigate potential effects.
1.1.25	CSAG (Page 23, Para. 97 and Page 55, Para. 22)	Comment that the Applicant has not provided evidence to suggest ALC classification was factored into the selection of the Site or for the use of agricultural land to be necessary.	The Applicant disagrees with this comment. As recognised in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**, the Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. Framing the BMV take is NPS EN-3 (2023) which places emphasis on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. Importantly, however, NPS EN-3 (2023) goes on to state that *"land type should not be a predominating factor in determining the suitability of the Site location"*. NPS EN-3 (2023) continues to acknowledge that solar development is not prohibited on BMV land, land recognised for its natural beauty or ecological or archaeological importance and that it is recognised that, at scale, developments may use some agricultural land. As concluded in the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**, the Proposed Development is compliant with the relevant policies in NPS EN-1 (2023) and NPS EN-3 (2023).

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
1.1.26	CSAG (Page 23, Para. 102 and Page 55, Para. 22)	Comment noting that the Applicant's Reasonable Alternatives Considered Chapter of the Environmental Statement has not demonstrated that accessibility has played a part in the selection of the Site or the consideration of alternatives. Further comment that the Site Selection Report acknowledges the need for road improvements and that there has not been an examination of whether an alternate site could have avoided the need for such mitigation.	**ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** notes in section 4.4 that the Site selection considered the suitability of access routes within the search area. The Order Limits are accessible by the local road network and well serviced by the strategic road network by the A41 to the south, the A421 to the north and the A4146 to the east. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**) also notes the presence of nearby large scale infrastructure which indicated that the wider road network was sufficient for construction purposes. However, some areas would require condition improvements, passing places and localised widening to be suitable for the purposes of the Proposed Development. This is not uncommon for projects, such as the Proposed Development, which are proposed in rural locations. Furthermore, the Applicant has sought to limit effects on communities from traffic wherever possible. This has involved designing a construction traffic route which avoids local villages.
1.1.27	CSAG (Page 25, Para. 108, 109 and 110 and Page 55, Para. 26)	Comment noting that security and lighting considerations are a criterion omitted from consideration in the Site selection process and that light is a particular concern given the local ecological sensitivity and dark night skies.	The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** recognises security and lighting serving as a factor which influences site selection. The Report goes on to note through section 3.1 that the nature of the landscape of the Proposed Development is such that natural features which may assist in security measures are less available, noting that it is a gently undulating topography. Therefore, no further consideration was provided on this matter. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]** outlines the security measures, including lighting, incorporated in the design of the Proposed Development's design and that security and lighting arrangements have been designed to respond sensitively to ecological and landscape features. For example, the CCTV technology type will use a passive infra-red detector to reduce the use of lighting, as secured through the **Design Commitments [EN010158/APP/5.9.4]. ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]** also confirms that the Rosefield Substation, BESS, Main and Satellite Collector Compounds are to not be permanently lit.
1.1.28	CSAG (Page 31, Para. 132)	Comment noting that the Statement of Need acknowledges that BESS provides storage for short periods only and that this kind of storage cannot compensate for the generation profile of solar.	Section 7.9 of the **Statement of Need [APP-036]** explains how a co-located Solar and BESS scheme may operate together and how the BESS may support the solar component of the Proposed Development. Short Duration Storage assets such as BESS are well suited to addressing short duration balancing needs such as daily cycles associated with storing solar generation when it is generated in abundance, and releasing it when it is needed more (including in the evening or overnight). The proposed BESS will support the operation of the Proposed Development by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Proposed Development, being the level of carbon free energy sent to the grid. Section 6.11 of the Statement of Need explains that storage duration refers to the length of time that the storage facility could discharge at its full stated power, rather than the time for which energy can be efficiently stored between import (charge) and export (discharge).
1.1.29	CSAG (Page 215)	Comment noting that there has been no effort to identify alternative sites that contain poorer land quality in the	The Applicant points to NPS EN-1(2023) paragraph 4.3.9 which states that 'this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		district, let alone brownfield sites, noting that there is a large presence of Grade 4 land in the vicinity. The Applicant has not demonstrated any detailed assessment of alternative sites to show that poorer land is not available.	project represents the best option from a policy perspective'. Moreover, and 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 is it is the best option, but rather that it is acceptable under the provisions of the relevant policy. Therefore, the Applicant disagrees with the statement made. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. With regard for brownfield sites, the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [**REP1-016**]) goes on to confirm that the Applicant had considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility scale solar development. The search of Buckinghamshire Council's brownfield register confirmed that none of the brownfield sites would have the capability of meeting the project objectives, largely due to the insufficient size of the sites.
1.1.30	CSAG (Page 226, Para. 6.7)	Comment noting that the Applicant recognises that the May 2024 Written Ministerial Statement states that brownfield and low agricultural quality land should be used first but then fails to justify why the Proposed Development is using higher quality land. The onus is placed on the Applicant to demonstrate that there is no non-agricultural land available.	The Applicant disagrees with this statement. Please refer to the Applicant's response to **Ref. 1.1.25** above.
1.1.31	CSAG (Page 150, Paras. 9.33 and 9.34 and Paga 155, Paras. S1.40 and S1.41	Comment noting that solar is extremely inefficient and requires disproportionately large amounts of land. Further comment querying whether the Proposed Development could use less land to deliver the same amount of energy to potentially reduce levels of landscape, visual, and other harm.	The **Statement of Need [EN010158/APP/5.6]** [**APP-036**] explains that NPS EN-3 (2023) provides guidance that, along with associated infrastructure, a solar farm typically requires between 2 to 4 acres for each MW of output (Para 2.10.17), and that the illustrative design for the Proposed Development lies within that range. Further, that by delivering to within that range, the Proposed Development is likely to produce a similar or greater quantity of low-carbon electricity per year, than other low-carbon technologies which may be deliverable at the same location. The updated NPS EN-3 (2025) which is also capable of being relevant to the decision includes a range of 4 to 5.6 acres for each MW of output (Para 2.10.9). The illustrative design for the Proposed Development therefore over-delivers against (i.e. is more land efficient) the indicative range included in the updated NPSs. The **Statement of Need [EN010158/APP/5.6]** [**APP-036**] also explains that at the detailed design stage, the Applicant will seek to maximise use of the connection capacity which is to be made available to it by examining opportunities to enhance the overall output and efficiency of the scheme. This may be through procuring more advanced (efficient) panels or spacing them out more (increasing the pitch) within land parcels to reduce shadowing effects or removing inefficient corners of fields that reduce infrastructure requirements. However, any optimisation of layout at a detailed design stage would also seek to use all available and suitable land within the Order Limits

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			to maximise the benefits generated by the Proposed Development over its lifetime. It would be unlikely at that stage for the Applicant to identify any areas of land which are suitable for Solar PV modules which would be useful to keep out of the Proposed Development for alternate use.
		Energy Generation and the Status of the Grid Connection	
1.1.32	NGET (Paras. 2.6, 2.7 and 2.8)	Comment noting concern with the Order Limits extent, particularly with regard for Plots 7/1, 7/2, 7/4 7/5, 7/9, and 7/12 on the Land Plans. Further comment that plots 7/1, 7/2, 7/4 and 7/5 are within the footprint of the East Claydon Project and that the Proposed Development seeks permanent acquisition of Plots 7/9 and 7/12. Further comment that the permanent acquisition of Plots 7/9 and 7/12 would constrain the reconfiguration of existing overhead lines works.	Plots 7/1, 7/2, 7/4, 7/5 are included within the Order Limits for the connection and provision of a cable connection (the 'Grid Connection Cabling Corridor') from the Proposed Development to either the existing or the newly proposed National Grid East Claydon Substation (referred to by NGET as the East Claydon Project). The location of the connection to the National Grid East Claydon Substation is not yet known and therefore the Applicant has included a wider area in its Order Limits to ensure the rights are guaranteed when the connection location is known. The Grid Connection Cabling Corridor is an approximately 215m wide swathe, within which the Grid Connection Cabling Corridor working width of up to 25m is located. The typical 25m working width would be reduced to up to 12.5m where hedgerows need to be crossed, to minimise the removal and post-construction reinstatement of hedgerow. The cables and associated trench would seek to run alongside the two-lane haul road, where practicable, to avoid wider excavation. The Applicant notes that the width of the permanent easement will be approximately 6m for the Grid Connection Cabling Corridor, noting this is only indicative. The Applicant seeks permanent acquisition powers over plot 7/9 because it is the proposed location of the Rosefield Substation and Solar PV development. The Applicant is seeking permanent acquisition powers plot 7/12 because it is part of the AIL Corridor. While future overhead line works are currently unknown, the Applicant is confident there is sufficient room and flexibility within the Order Limits to accommodate reconfiguration of existing overhead lines. The Applicant and NGET continue to work together to ensure both the Proposed Development and the National Grid East Claydon Substation can be brought forward and neither project restricts the other. The parties are in the process of negotiating protective provisions and commercial agreement to manage the interface between the parties.
1.1.33	CSAG (Page 17, 28 and 31, Paras. 75, 76, 77, 122, 123, 124 and 128 and Page 54, Paras. 17 and 18) CSAG Appendix (Page 1)	Comment noting that the Solar PV element of the Proposed Development has a Gate 2 offer and that the BESS element has a Gate 1 offer. Further comment noting that the Applicant has not explained why the neighbouring extant Statera permission (appeal reference: APP/J0405/W/25/3360815) could not serve the Proposed Development, particularly where the BESS element of the Proposed Development has a Gate 1 offer. Further comment that NESO's reforms have reshaped the grid connections queue but that a large oversupply of BESS remains.	The Applicant has been informed that the BESS component of the Proposed Development has been re-prioritised with a Gate 1 connection from NESO. This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. The Applicant has been informed that the solar component of the Proposed Development has been prioritised with a Gate 2 Phase 2 connection from NESO. This means that the Proposed Development is a part of the proposed pipeline of projects which has been informed by project readiness and 'strategic alignment'. NESO anticipate that Gate 2 Phase 2 projects will be able to connect between 2031 and 2035. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Paragraph 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Further, the Government confirmed in its 2025 consultation response to Planning

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Further note in the CSAG Appendix of an email received confirming the Applicant's grid connection status.	for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, the need established by NPS EN-1 continues to apply to schemes or components of schemes which currently have a Gate 1 connection prioritisation. NPS EN-3 (2023) states that the government is supportive of solar that is co-located with other functions (for example, storage) to maximise the efficiency of land use. (Para 2.10.10). The project referenced in this representation is not co-located with the Proposed Development. The proposed BESS will support the operation of the Proposed Development by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Proposed Development, being the level of carbon free energy sent to the grid, as explained in Section 7.9 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**.
1.1.34	CSAG (Pages 26 and 27, Paras. 117, 118 and 119 and Page 56, Paras. 28 and 29)	Comment noting that the Statement of Need's assertion that solar and BESS schemes should be approved even if they exceed targets set by Government in Clean Power 2030 does not accord with Government guidance and risks delivering an unbalanced energy mix.	This representation references Paragraph 6.12.5 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**, which explains the risk to achieving government's aims for the energy system associated with relying only on the development of as yet unproven, unconsented, or unfunded schemes or schemes with long or uncertain development timelines (Para 6.12.3). The government's prudent view that infrastructure development should be planned on a conservative basis, without over-relying on yet-to-be-proven technologies, technologies with long development lead-times, or technologies which have historically experienced funding difficulties is explained in Section 4.2 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** and is in accordance with the conclusions reached in Section 6.12. Further, the UK policy view is that a low-cost, Net Zero consistent system is likely to be composed predominantly of wind and solar (NPS EN-1 (2023), Para 3.3.20), which are proven in delivery, have established development lead-times, and have secured funding. Flexible assets are also needed to balance supply with demand. National policy is supportive of solar that is co-located with storage to maximise the efficiency of land use. Further, in NPS EN-1 (2023) the government concludes that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve Net Zero (Para 4.2.4), and because of the decarbonisation, energy security, and affordability benefits that they deliver.
1.1.35	CSAG (Page 28, Para. 121 and Page 56, Para. 29)	Comment noting that NESO's Connections Reform Detailed Results Data shows that Zone T6 is full with no capacity remaining for future gated windows for either solar or BESS.	The Applicant has been informed that the solar component of the Proposed Development has been prioritised with a Gate 2 Phase 2 connection from NESO. This means that the Proposed Development is a part of the proposed pipeline of projects which has been informed by project readiness and 'strategic alignment'. NESO anticipate that Gate 2 Phase 2 projects will be able to connect between 2031 and 2035. This means that if the Proposed Development was not consented, NESO's pipeline of prioritised projects would not be of a sufficient capacity to meet government's aims, either in Zone T6 or nationally. Further, it is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Specifically, the Government confirmed in its 2025 consultation response to

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. The Applicant has addressed the need for BESS as established in national policy and in relation to NESO's prioritisation under **Ref. 1.1.33** above.
1.1.36	CSAG (Page 30, Para. 126) CSAG Appendix (Pages 2 – 20)	Comment noting that CSAG disagree with the Statement of Need's interpretation of the Annex to Clean Power 2030 in that they consider the ranges create a ceiling on the requirement for low carbon electricity generation capacity. Note that the Clean Power 2030 Action Plan Annex has been provided in CSAG's Appendix.	The Applicant disagrees with this representation. NPS EN-1 (2025) clarifies that it is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). The Government also confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*.
1.1.37	CSAG (Page 32, Para. 134)	Comment noting the Applicant's assertion that decarbonisation is of critical importance but that they do not consider that the Proposed Development factors in this as it would not commence construction until 2029 and that this may be pushed back by the delivery of the new East Claydon Substation.	The **Statement of Need [EN010158/APP/5.6]** [APP-036] explains that large-scale solar delivery both before and beyond 2030 is important not only to reduce power-related carbon emissions, but also to provide a timely next step contribution to a future generation portfolio which will support the electrification and therefore decarbonisation of transport, heat and industrial demand. This is consistent with the government's Clean Power 2030 Action Plan which seeks to provide a framework for the prioritisation of offers for projects which align with NESO's advice on connections which are deliverable by 2030, and which can demonstrate that they have the means to deliver, while maintaining a robust pipeline of deliverable projects beyond 2030. Further, NPS EN-1 (2023) states that the SoS should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the SoS is not required to consider the specific contribution of any individual project to be satisfied that need is established (Paras 3.2.6 to 3.2.8). In this regard, the current connection date and re-prioritised connection window for the Proposed Development does not alter or diminish the substantial weight the benefits generated by the Proposed Development should be accorded, because of the decarbonisation, energy security, and affordability benefits that they deliver. This guidance on SoS decision making is also included in the updated NPS EN-1 (2025), which is potentially capable of being important and relevant consideration in the decision-making process at Paras 3.2.8 to 3.2.10.

Table 1-2: Need, Site Selection and Alternatives (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Approach to the Consideration of Alternatives, Including Location, Scale and Technology	
1.2.1	Waddesdon Surgery (Para. 4)	Comment that the Applicant's choice to develop a rural area, rather than an urban area, places specific risks on the provision and function of emergency services.	The Applicant notes that NPS EN-3 (2023) acknowledge, through Paragraph 2.10.36, that potential solar farm sites are largely in rural areas and so the location of the Site in a rural area is not unreasonable. Moreover, the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** sets out the logical approach taken to inform the Site selection process, starting from the point of connection at the National Grid East Claydon Substation, and using the criteria set out in section 2.10 of NPS EN-3 (2023). The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3]**. The traffic effects of the Proposed Development are temporary and not significant. The traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
1.2.2	Preston Farms and TCS Biosciences Ltd (Page 2, Para. 6)	Comment noting concern that the Applicant is seeking to spatially insert the Proposed Development and associated rights over land into the Preston Farms holding and also position plant close to the holding boundary without necessary buffering despite there being reasonable alternatives that should be pursued instead.	**Appendix 1** to the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** sets out a number of changes that have already been made to the design of the Proposed Development in response to discussions with Preston Farms Limited. These changes include: • In response to representations including of an Affected Person, Field E23 was removed as an option for the location of the BESS. • A proposed Construction Compound was removed from Fields SA35-45 (plot 6/10) to ensure less overall impact on land retained by the Prestons during the construction phase. • The indicative access across Field SA46 (plot 6/12) was moved from the field boundary to instead follow the route of the existing overhead infrastructure, to reduce the impact on retained land, follow existing infrastructure and assist with the movement of livestock. • Changes were made during Phase Two Consultation and particularly in response to engagement with Preston Farms Limited, to refined the design so that the proposed Rosefield Substation would instead be located in Field E11 and/or E20 (plot 7/9) in recognition of the need for Preston Farms Limited to be able to move animals through plot Field E23 (6/13) and in order to reduce any perceived impact on adjoining land. • Design Commitment G2 provides that the Solar PV modules within Field E23 (plot 6/13) will be designed to create a corridor for grazing animals to pass through Solar PV development for the tenants, being Preston Farms Limited. This commitment is secured in **Design Commitments [EN010158/APP/5.9.4]**. • Proposals for the BESS were removed from any areas around Sion Hill Farm after Phase One Consultation - namely Field E23 (plot 6/13) - and located in Field D8 and/or D9 (plot 6/2 and/or 4/11) to limit any disturbance and in particular any noise disruption during both construction and operation.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			• After Phase One Consultation, land to the west of Parcel 3 and south of Sion Hill Farm was removed from the Order Limits as it was not required for the Interconnecting Cable Corridor or Internal Access Corridor. In terms of buffering of the Proposed Development, **Appendix 1: Green and Blue Infrastructure Parameters** to the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3]** indicates locations for strategic early planting along the western and southern boundaries of Parcel 3. Management Objective 3 of the **Outline LEMP [EN010158/APP/7.6.3]** identifies that these areas can be planted following DCO consent (if it is granted) and before construction is started as far as reasonably practicable. A phasing strategy for new planting will be developed at the detailed design stage of the Proposed Development within the detailed Landscape and Ecological Management Plan(s). This will identify priority areas for new planting to be implemented. Buffering will also serve to reduce the noise levels within fields occupied by livestock. In addition, as indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, a number of the outline management plans were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on the Prestons' businesses. In terms of noise and vibration impacts to livestock and horses, this has been considered within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, and further consideration given in **Annex A** of **Appendix 1** to this document in response to engagement with Preston Farms Ltd. As part of Deadline 1, the **Outline Construction Environnemental Management Plan (Outline CEMP) [EN010158/APP/7.2.3], Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.3]** and **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.3]** have been updated to include further commitments for livestock and horses. As part of Deadline 2, **Annex A** of **Appendix 1** to this document has been prepared to provide further information regarding the effects of noise and vibration. The document presents a summary of available research and guidance on the impacts of noise and vibration on livestock and horses, and sets out the mitigation measures proposed to avoid or reduce adverse effects.
1.2.3	Preston Farms and TCS Biosciences Ltd (Page 2, Para. 10)	Comment noting that government policy and guidance is clear that the compulsory acquisition and disturbance to businesses should be kept to the minimum reasonably necessary through exploration of all reasonable alternatives and tests of necessity and proportionality.	The Applicant has, in its design, had consideration to the potential impact on businesses sought to keep impact, if any, to a minimum. The tenant's landlord has offered replacement land to compensate for the land lost to the Proposed Development and has sought to agree terms that secure the future of the business in this location. The Applicant has given further commitment through the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** to minimise impact on the business during construction, operation and decommissioning. **Appendix 1** to this document sets out all impacts considered and design and mitigation to be implemented in relation to the effects on Prestons' Farms and TCS Biosciences Limited.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The Applicant is satisfied that they have taken all reasonable steps to ensure the impact on the business is kept to the minimum reasonably necessary whilst still enabling the delivery of a NSIP.
1.2.4	Preston Farms and TCS Biosciences Ltd (Page 8, Paras. 61, 62 and 63)	Comment noting that the material impacts to Preston Farms and TCS Bioscience Ltd from the Proposed Development are avoidable if the application is amended to reflect the following: 1) There are other, larger and more suitable access points closer to Parcel 3 than Granborough Road, including via Winslow Road, that would avoid interference with the holding. 2) It is a reasonable alternative to leave field E23 free of works other than at most, cabling, and free of access requirements other than at most, access to the cabling. 3) The same is true for the land (6/10-6/12) to the south of E23. The Applicant can use or secure additional land within or outside the Order Limits on which to place solar panels in lieu of E23.	1. Access into Parcel 3 is proposed from Granborough Road as this is the most appropriate and efficient form of access to the development area. This ensures that construction traffic does not pass through villages and settlements on the local road network leading from the A41. The access strategy on the public road allows for other road users to continue to access the length of Granborough Road and includes passing places to benefit all road users. Winslow Road is the only alternative access point into Parcel 3 from the local road network. There are no other locations where Parcel 3 abuts the highway. 2. It is not the Applicant's intention to remove Solar PV development from Field E23. Field E23 is required to ensure the Proposed Development delivers the maximum solar benefit. Parcel 3, of which E23 forms part, is located close to the existing National Grid East Claydon Substation, the proposed National Grid East Claydon Substation extension and the consented Statera BESS. The Applicant considers Field E23 is an appropriate location for PV solar development. At Deadline 1, the Applicant amended design commitment G2 within the **Design Commitments [EN010158/APP/5.9.4]** to specifically require the design and routing 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. At Deadline 2, a further update has been made to the **Design Commitments [EN010158/APP/5.9.4]** to secure a minimum width of 20m for the corridor. 3. There is no proposed access route across Fields SA35-45 (plot 6/10) between Parcel 2 and Parcel 3 during the operational (including maintenance) phase of the Proposed Development. Access to Fields SA35-45 (plot 6/10) during the operational (including maintenance) phase will be limited to ad hoc, infrequent access for any necessary cabling maintenance works. The full extent of Fields SA35-45 (plot 6/10) will not be required for the Interconnecting Cable Corridor(s) between Parcels 2 and 3, only trenches up to a maximum width of 35m as secured by the **Design Commitments [EN010158/APP/5.9.4]**, with a maximum construction working width of up to 50m required as confirmed in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**. **ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3.2] [REP1-049]** shows the indicative routes these will follow, but the whole fields are included within the Order Limits to allow flexibility in the final location of the Interconnecting Cable Corridor(s) at the detailed design stage. The same is true for Fields SA47-50 (within plot 6/12), with Field SA46 (within plot 6/12) having the access route into Parcel 3 through it as discussed above.
1.2.5	Preston Farms and TCS Biosciences Ltd (Page 9, Para. 66)	Comment noting that it is unclear why it is necessary for the solar farm substation and collectors to be positioned where they are, immediately north of E23, and similarly for the solar farm BESS to be positioned where it is. It is unclear why these items could not be located in the main body of the solar farm to the west, with a cable run to the East Claydon substation. If the substation, collectors and BESS are to remain where they are proposed, suitable	The locations of Rosefield Substation, the Main Collector Compound and the BESS have been informed by a range of technical and environmental considerations. As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, these have been informed by environmental surveys and appraisal, technical information, targeted engagement with statutory consultees and stakeholders, statutory consultation and technical design workshops. Information that fed into the location of Rosefield Substation, the Main Collector Compound and the BESS includes, information on the proposals for the National Grid East Claydon Substation, environmental surveys including landscape and visual assessment, residential visual amenity

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		buffering and other measures to avoid disturbance to the livestock from those areas is needed.	assessment, glint and glare assessment, noise assessment, ecology surveys, geophysical survey, agricultural land classification surveys and flood risk assessment. Reasons identified within the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** for siting larger equipment, such as Rosefield Substation and the Main Collector Compound in Parcel 3 include: • Close proximity to the National Grid East Claydon Substation. • Close proximity to East Claydon Road, an approved AIL route, to facilitate access and avoid traffic passing through the local villages such as Botolph Claydon, East Claydon, Steeple Claydon, Granborough, Quainton and Calvert. • The scale and topography of the landscape of Parcel 3, which is generally flatter, with larger fields and less intimate than other areas of the Site, and therefore more suited to large scale infrastructure. • The presence of existing infrastructure including prominent pylons. • Notably less PRoW than other areas of the Site. As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, there are a number of reasons why the proposed BESS has been Fields D8 and D9 (plot 6/2 and 4/11). Fields D8 and D9 (plot 6/2 and 4/11) 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. The option to include BESS was also removed from Field E23 in Parcel 3 after the Phase Two Consultation, to respond to feedback that included concerns relating to views from Botolph Claydon and East Claydon into Parcel 3 and from TCS Biosciences Ltd noting that BESS in Field E23 would cause disruption to the organisation. There are numerous ecological and heritage constraints that apply to Parcel 1 and areas of Parcel 2 that would make them unsuitable for Rosefield Substation, the Main Collector Compound and the BESS. In terms of buffering of the Proposed Development, **Appendix 1: Green and Blue Infrastructure Parameters** to the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3]** show indicative locations for strategic early planting along the western and southern boundaries of Parcel 3. Management Objective 3 of the **Outline LEMP [EN010158/APP/7.6.3]** identifies that these areas can be planted following DCO consent (if it is granted) and before construction is started as far as reasonably practicable. A phasing strategy for new planting will be developed at the detailed design stage of the Proposed Development within the detailed Landscape and Ecological Management Plan(s). This will identify priority areas for new planting to be implemented, which will act as a buffer between the Proposed Development and TCS Biosciences and Preston Farms. In addition, as indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, a number of the outline management plans were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on TCS Biosciences and Preston Farms. These include measures relating to noise.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
1.2.6	Preston Farms and TCS Biosciences Ltd (Representation Summary, Page 13)	Comment requesting the following changes to the Proposed Development: • Removal of the main Parcel 3 construction route from Granborough Road, noting that there are other available routes. • Removal of Field E23. • Limitation of rights across the holding to essential cabling only. • Effective sound and visual separation between intrusive infrastructure and sensitive areas.	1. Access into Parcel 3 is proposed from Granborough Road as this is the most appropriate and efficient form of access to the development area. This ensures that construction traffic does not pass through villages and settlements on the local road network leading from the A41. Winslow Road is the only alternative access point into Parcel 3 from the local road network. There are no other locations where Parcel 3 abuts the highway. 2. It is not the Applicant's intention to remove Solar PV development from Field E23. At Deadline 1, the Applicant amended design commitment G2 within 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. At Deadline 2, a further update has been made to the **Design Commitments [EN010158/APP/5.9.4] t**o secure a minimum width of 20m for the corridor. 3. The extent of rights across Fields SA35-50 (plots 6/10-6/12) are discussed in detail above under **Ref. 1.2.4**. 4. As indicated above in relation to **Ref. 1.2.2, Appendix 1: Green and Blue Infrastructure Parameters** to the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3]** indicates locations for strategic early planting along the western and southern boundaries of Parcel 3. In addition, as indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on the Prestons' businesses. These include measures relating to noise. As part of Deadline 2, **Annex A** of **Appendix 1** to this document has been prepared to provide further information regarding the effects of noise and vibration.
1.2.7	Preston Farms and TCS Biosciences Ltd (Page 25, Paras. 75, 76 and 77)	Comment noting that the Proposed Development should be reconfigured to avoid interference and interruption to operations of the holding. While infrastructure in E20/21 and 22 is problematic, it could potentially be workable with reconfiguration and additional mitigation including: • Limitation of access rights • Removal of main construction route to Parcel 3 • Removal of Field 23 • Defined sound and visual separation • Enhanced construction mitigation	See the Applicant's responses to **Ref. 1.2.6** above. The overall response is set out at **Appendix 1** to this document. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.2]** and **Outline DEMP [EN010158/APP/7.4.3]** were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on the Prestons Farms and TCS Biosciences businesses. These include measures relating to noise, communication and biosecurity. The Applicant has committed to ongoing discussion with Preston Farms and TCS Biosciences Ltd to better understand any additional measures that can be incorporated to further reduce impacts on the businesses, including construction mitigation.
1.2.8	Grendon Underwood Parish Council (Page 2)	Comment noting a failure to provide justification that this is the most suitable site, the failure to show efforts made in seeking alternatives, and that the harms outweigh the benefits. Further comment that there are numerous brownfield sites which are more appropriate and wouldn't result in the loss of agricultural land.	Paragraph 4.3.9 of NPS EN-1 (2023) 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. The **Site Selection Report** (**Appendix 1** to 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 was carried out in accordance with the sets out that the starting point for the Site selection

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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. As acknowledged throughout the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the Proposed Development has been developed iteratively, through consultation and engagement, and has resulted in changes to the design of the Proposed Development as well as the approach to embedded and additional mitigation to avoid or reduce where practicable the potential for residual adverse effects to the community. Section 10 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** notes that the combined nature of the benefits of the Proposed Development outweigh any residual effects and that the planning balance is firmly in favour of approval. With regard for brownfield sites, the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016])** confirms that the Applicant had considered whether sufficient previously developed and/or brownfield land (including available previously developed industrial land) would be available to develop a utility scale solar development. However, this search confirmed that no sites would have the capability of meeting the project objectives, largely due to the insufficient size of the sites.
1.2.9	Edgcott Parish Council (Page 2)	Comment noting a failure to provide justification that the land is the most suitable for the Proposed Development and that there has been a failure to seek alternatives, especially given the presence of nearby brownfield sites.	The Applicant notes this comment and points to the Applicant's response in **Ref. 1.2.8** above for an address of these comments.
1.2.10	Twyford Parish Council	Comment stating that large scale solar farms shouldn't be on agricultural land and are better suited to roofs and brownfield sites. Further comment that no alternatives have been considered.	The Applicant is supportive of rooftop solar installations. However, Section 7.3 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** notes that rooftop schemes on their own would not be able to deliver a total capacity consistent with the Government's ambitions. Therefore, and in accordance with the sentiment of Paragraph 2.1.3 of NPS EN-1 (2023), a significant amount of energy infrastructure (such as large-scale solar schemes) is needed at both the local and national scale. Indeed, the Statement of Need also describes the government's UK Solar Roadmap, which includes a policy scenario that 60-65% of capacity installed by 2030 could be large-scale projects. Section 3.9 of the Statement of Need also explains that the government has clarified that its capacity ranges for solar do not seek to prioritise or constrain rooftop solar deployment but are applicable to schemes of over 1MW in England and Wales (i.e. ground-mount schemes), which are therefore an integral part of government's energy strategy. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. Section 4.5 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** notes that alternative types of renewable energy generation technologies, such as wind and hydrogen, were not discounted by the Applicant. However, wind

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			technology was not considered feasible as at the time of design development, onshore wind was banned in England and therefore was not achievable under the grid connection timescales. Hydrogen is not a generation technology in its own right and it was not considered suitable due to the commercial viability and environmental impacts for this type of energy generation in comparison to solar energy generation.
1.2.11	Twyford Parish Council	Comment stating that wind would produce more energy more efficiently, and that bladeless turbines would be less visually invasive as well as allowing for agriculture to continue.	Section 4.5 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] notes that wind technology was not considered feasible as at the time of design development, onshore wind was banned and therefore was not achievable under the grid connection timescales. The Site is also not considered to be well suited for onshore wind energy generation due to the low, relatively flat topography of the local area, which would likely give rise to greater landscape and visual effects in comparison to Solar PV development due to the height of the turbines. In addition, the proximity to residential dwellings may result in adverse effects associated with shadow flicker and wind turbine noise. Furthermore, normal agricultural use (e.g. arable and/or grazing as current) would continue (except for the cable installation and access track construction) in Work Nos 2B, 6, 7 and 10B (**Works Plans [EN010158/APP/2.3.3]** [REP1-005]) (all areas outside of main developable Parcels).
1.2.12	East Claydon Parish Council (Page 3, Para. 1)	Comment stating that Solar PV modules should be sited on rooftops, especially those of factories and warehouses, rather than in fields.	Section 7.3 of the **Statement of Need [EN010158/APP/5.6]** [APP-036] notes that it would not be feasible to reach the Government's solar capacity ranges through only rooftop and small-scale schemes. Therefore, large-scale solar schemes are also required in order to achieve Net Zero. It also notes that NPS EN-1 (2023) demonstrates the Government's view that rooftop and small-scale schemes are needed alongside, but not instead of, large-scale ground mount solar schemes; such as the Proposed Development. This is because the bulk generation potential of large-scale schemes and their connection to the National Electricity Transmission System enables their benefits to be felt more widely.

Table 1-3: Need, Site Selection and Alternatives (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
Approach to the Consideration of Alternatives, Including Location, Scale and Technology			
1.3.1	REP1-120, REP1-143, REP1-144, REP1-146, REP1-147, REP1-149, REP1-150, REP1-152, REP1-155. REP1-156, REP1-158, REP1-159, REP1-161, REP1-169, REP1-172, REP1-179, REP1-183, REP1-187, REP1-194, REP1-197, REP1-206, REP1-209, REP1-211, REP1-213, REP1-215, REP1-217, REP1-218, REP1-219, REP1-222, REP1-223, REP1-225, REP1-226, REP1-227, REP1-234, REP1-242, REP1-247, REP1-250, REP1-253, REP1-258, REP1-261, REP1-262, REP1-263, REP1-264, REP1-266, REP1-270, REP1-276, REP1-284, REP1-286, REP1-288, REP1-291, REP1-293, REP1-297, REP1-300, REP1-301, REP1-143	**Alternative locations** Comment that there are more suitable locations for and scales of solar development, including rooftops, smaller ground-mounted solar farms, brownfield land and poorer quality land.	The **Site Selection Report** (**Appendix 1** to 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 sets out that the starting point for the Site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable search area for a potential solar scheme and, within this search area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints. Chapter 8 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** provides evidence on the suitability of the proposed location for large scale solar. With regard for brownfield sites, the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** confirms that the Applicant had considered whether sufficient previously developed and/or brownfield land (including available previously developed industrial land) would be available to develop a utility scale solar development. However, this search confirmed that no sites would have the capability of meeting the project objectives, largely due to the insufficient size of the sites. The **Statement of Need [EN010158/APP/5.6] [APP-036]** recognises that smaller decentralised and community energy schemes, including on rooftops, can make a valuable contribution to meeting on-site electricity demand for domestic and commercial users. Paragraph 3.3.12 of NPS EN-1 (2023) demonstrates the government's view that such schemes are needed alongside, but not instead of, large-scale ground mount solar schemes. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low.
1.3.2	REP1-159, REP1-164	**Alternative locations** Comment that the Applicant has not appropriately considered alternative locations for the Proposed Development which has led to negative environmental effects.	The **Site Selection Report** (**Appendix 1** to 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 report sets out the logical approach taken to inform the Site selection process, starting from the point of connection at the National Grid East Claydon Substation, and using the criteria set out in section 2.10 of NPS EN-3 (2023). The search identified a single landowner, located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection. Discussions with other landowners in the area did not identify any alternative sites which met the Site selection criteria, either because they were not interested in offering their land for solar development, or because they were pursuing alternative proposals on their land. 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

Ref	WR	Summary Position	Applicant's Response
			(2023), the SoS *"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"*. Furthermore, Paragraph 4.3.9 of NPS EN-1 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 in recent Examining Authority Reports of Findings and Conclusions and Recommendation to the SoS, the planning balance should be framed against the need of the Proposed Development, the effects (beneficial and adverse) concluded within the ES, any other material considerations and the relevant legislative test(s); such as compulsory acquisition.
1.3.3	REP1-120, REP1-264	**Site selection** Comment that the Site selection justification for the Proposed Development and consideration of alternatives is not sufficient.	The Applicant disagrees. Both the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** and **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** provide detailed assessments of the Site selection process and the reasonable alternatives considered by the Applicant.
1.3.4	REP1-218	**Site selection** Comment that the project is based on there being a compliant landowner and has not followed a site selection process.	The Applicant disagrees. The **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the detailed site selection process carried out by the Applicant. Whilst the search identified a single landowner (located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection), discussions with other landowners in the area did not identify any alternative sites which met the Site selection criteria, either because they were not interested in offering their land for solar development, or because they were pursuing alternative proposals on their land. Furthermore, the Site chosen was considered suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints.
1.3.5	REP1-159,	**Site suitability** Comment that the unsuitability of the proposed site has resulted in poor design decisions such as increasing the height of solar PV in flood risk areas and raising parts of the BESS and Rosefield Substation.	The Applicant disagrees. As noted in **Sequential and Exception Tests** (**Appendix 5** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**), the Applicant did not rule out locating small areas of solar in Flood Zone 2 and 3 areas at the edge of field margins since if these areas were not proposed for solar, they would have been too small to have been productively farmed and so the Proposed Development would not be making the best use of land for renewable energy. This approach is consistent with the urgent need identified through NPS EN-1 (2023) and NPS EN-3 (2023) and with Paragraph 124 of the NPPF (in terms of making the most effective use of land). Therefore, the Proposed Development is proposing Solar PV modules in Flood Zone 2 and 3 areas which would be raised providing a sufficient freeboard above any potential flood waters; both fluvial and pluvial. The approach to good design, including project specific design principles, is set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** which also includes consideration of the design of the Proposed Development against the criteria in Annex A to the Planning Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice on Good Design'.

Ref	WR	Summary Position	Applicant's Response
			The Design Principles set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** include Strategic Principle 8 - Manage water, improve quality, reduce pollution. This is broken down into Project Principles that can be applied at the level of the Proposed Development, which includes Project Principle 8.2 - Apart from Solar PV modules, no built structures (Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds will be located within Flood Zones 2, 3a or 3b, or within areas of high or medium risk of surface water flooding. Solar PV modules will be above the maximum flood height level. This approach allows a balance between optimising the solar generation from the Proposed Development whilst balancing against the flood risk potential. The **Works Plans [EN010158/APP/2.3.3] [REP1-005]** secure the localised areas in which Solar PV modules may need to be up to 4.5m in height. Apart from Solar PV development, the Applicant has developed the design of the Proposed Development to ensure that Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds will be located in Flood Zone 1. This is secured via the **Design Commitments [EN010158/APP/5.9.4]**. Project Principle 1.1 - Design for resilience and adaptation to future climate change within the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** identifies that one of the major risks posed to new developments regarding climate change is flood risk. The design of the Proposed Development ensures that potential future flood risk is considered and places potentially vulnerable infrastructure (i.e. Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds) on raised platforms above ground level, to further minimise the residual flood risk. The **Design Commitments [EN010158/APP/5.9.4]** secure the Finished Platform Level for the Rosefield Substation, BESS and Main Collector Compound and the maximum height of all elements of the Proposed Development, which have been considered within the ES.
1.3.6	REP1-140, REP1-143, REP1-144, REP1-146, REP1-147, REP1-150, REP1-161, REP1-177, REP1-179, REP1-185, REP1-186, REP1-197, REP1-222, REP1-240, REP1-250, REP1-252, REP1-286, REP1-287, REP1-288	**Alternative technologies** Statement of support for other forms of energy generation, including wind, nuclear, tidal.	The Applicant notes this comment though national policy calls for a mix of renewable and low-carbon energy sources in order to meet future energy demands. Therefore, the deployment of these other technologies together with the Proposed Development is critical. The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that the government's stated policy objectives for the energy system are to ensure our energy supplies always remains secure, reliable, affordable, and consistent with achieving net zero by 2050, and that "*solar is a key part of the government's strategy for low cost decarbonisation of the energy sector*" (NPS EN-1 (2023) Paragraph 2.10.9). As such the Proposed Development would deliver long term benefits through the provision of secure, low-carbon and low-cost energy supplies which will also shield consumers from the effects of volatile international energy markets. Section 4.5 of **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** notes that alternative types of renewable energy generation technologies, such as wind and hydrogen, were not discounted by the Applicant. However, wind technology was not considered feasible as at the time of design development, onshore wind was banned and therefore was not achievable under the grid connection timescales. Hydrogen is not a generation technology in its own right and it was not considered suitable due to the commercial

Ref	WR	Summary Position	Applicant's Response
			viability and environmental impacts for this type of energy generation in comparison to solar energy generation.
1.3.7	REP1-136, REP1-137, REP1-139, REP1-146, REP1-154, REP1-175, REP1-178, REP1-179, REP1-186, REP1-209, REP1-211, REP1-214, REP1-217, REP1-222, REP1-250, REP1-252, REP1-271, REP1-284, REP1-287, REP1-301	**Suitability of solar** Comment that solar technology is inefficient in the UK or will likely be outdated.	The Applicant disagrees and as noted in the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**, solar has undergone significant technological advances in scale and commercial efficiency, and the UK has many areas of commercially viable solar irradiation. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations.
1.3.8	REP1-214	**Site selection** Comment that the Applicant has chosen the Site based on proximity to connection and that it was under a single landowner, the latter of which is now inaccurate as the Order Limits now include parcels of land owned by a third party who actively require the land as part of their business. Comment that it is inappropriate to seek powers of compulsory acquisition over this land, and that previous statements made about landownership by the Applicant are false.	The Applicant disagrees. The search identified a single landowner (located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection) and discussions with other landowners in the area did not identify any alternative sites which met the Site selection criteria. The Applicant confirms that areas required for underground Interconnecting Cabling Corridor(s), access and road widening works fall under separate ownership. All Solar PV development, BESS, Rosefield Substation and ecological mitigation and enhancement areas sits on land that is owned by a single landowner and, as reflected in the **Design Approach Document [EN010158/APP/5.8.2]** **[REP1-018]**, the Stage 1 Design was contained within a single landowner's holding. At Stage 2 Design, key factors influenced the evolution of the Proposed Development's design and included, but was not limited to, the provision of updated information on the proposals for the National Grid East Claydon Substation. This, together with the wider furthering of design, saw a requirement to include Fields SA55 and SA56 and Fields SA58 and SA59 which form parts of other landowner holdings.
1.3.9	REP1-291	**Site selection** Comment that the Proposed Development should be within local parish boundaries like applications for housing developments.	There are no planning policy requirements for planning applications of any kind (local or NSIP-scale, such as the Proposed Development) to fit within local parish boundaries. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3]** **[REP1-016]** sets out the reasoning for the Proposed Development, including its size and location.
1.3.10	REP1-182, REP1-254	**Site selection** Comment that the number of other infrastructure projects in the local area make this location unsuitable.	The Applicant recognises that there are several other developments in construction or planned within the local area and these have been considered in the development of the design. Such other developments in the local area do not make the location unsuitable for the Proposed Development. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, including High Speed 2 (HS2), East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach Solar Farm.
Energy Generation and the Status of the Grid Connection			

Ref	WR	Summary Position	Applicant's Response
1.3.11	REP1-175, REP1-191,	**Site selection** Comment that there is insufficient evidence to demonstrate that other points of connection into the National Grid are not appropriate.	The **Site Selection Report** (**Appendix 1** of the **Planning Statement [EN010158/APP/5.7.3]** **[REP1-016]**) sets out that the starting point for the Site selection process was the identification of capacity at the National Grid East Claydon Substation. Importantly, NPS EN-3 (2023) recognises that the distance to a connection can have a significant effect on project viability and that applicants; "*may choose a site based on a nearby available grid export capacity"*. The influence of available grid export capacity on site selection is therefore justified. The **Statement of Need [EN010158/APP/5.6]** **[APP-036]** recognises that, due to the finite number of existing substations (and the smaller number of those substations with available capacity) new grid substations may be needed to connect the capacity of solar required to meet Net Zero. This is true in the Proposed Development's case. However, the Applicant's **Grid Connection Statement [EN010158/APP/7.1]** **[APP-137]** explains that the Applicant understands that NGET plan to replace their existing East Claydon Substation, which is nearing the end of its useful life, with a new, larger substation, because the equipment needs replacing regardless of the Proposed Development's connection. The connection for the Proposed Development would be less than 10% of the proposed capacity of the new substation. The expansion is not attributable to the Proposed Development's connection. NPS EN-1 (2023) describes that the SoS 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 (Para 4.3.24). Therefore, any other appropriate points of connection to the National Electricity Transmission System insofar as are coming forward with schemes, should be considered as additional, rather than alternative, to the Proposed Development.
1.3.12	REP1-186	**Replacement Substation** Comment that the project is too large to be able to connect to the existing National Grid Substation and therefore it should be scaled down due to the urgent need for electricity.	The Applicant disagrees. As set out in the **Grid Connection Statement [EN010158/APP/7.1]** **[APP-137]** the Applicant has secured a grid connection agreement with NESO at the National Grid East Claydon Substation, with a grid connection date of Q4 2031. It should be noted that the Applicant has a grid connection agreement with NESO to import and export 500MW (AC) of clean power, which has been requested to be reduced to 335MW (AC). It is expected that the grid connection agreement will be updated by NESO to reflect this by Q3 2026. The Applicant requested this reduction as the iterative changes to the Proposed Development, which included large reductions in the developable areas due to environmental considerations and community feedback, meant that the 500MW export capacity would not likely be met. Through regular discussions with NGET, please refer to the **Draft Statement of Common Ground with National Grid Electricity Transmission Plc [EN010158/APP/5.20]** **[REP1-031]**, the Applicant understands that NGET plans to replace the existing East Claydon Substation (originally built in the 1960s), with a new substation via the East Claydon Project. The National Grid East Claydon Substation is nearing the end of its useful life, and the equipment needs replacing regardless of the Proposed Development's connection. The Grid Connection Statement also acknowledges that NGET will replace the National Grid East Claydon Substation to meet new connection commitments. However, the Proposed Development was not the initiating scheme for the replacement of the National Grid East Claydon Substation.
1.3.13	REP1-159, REP1-224	**Connection date** Comment that the need for and timing of the Applicant's grid connection is uncertain due to connections reform and reliance on the construction of a new substation.	The Applicant has secured a grid connection agreement as set out in the **Grid Connection Statement [EN010158/APP/7.1]** **[APP-137]**. The current grid connection date is 31 October 2031. The Applicant has received confirmation that the solar element of the Proposed Development will

Ref	WR	Summary Position	Applicant's Response
			receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive) The Applicant continues to work closely and collaboratively with National Grid to deliver the Proposed Development to meet the prevailing grid connection date.
1.3.14	REP1-136, REP1-154, REP1-159, REP1-218, REP1-224, REP1-238, REP1-300	**Need for the BESS** Comment that the case for the need for the BESS is not made, for reasons including the receipt of a Gate 1 offer for it, the proximity of other consented BESS and that the UK has already hit its capacity targets for BESS.	The Applicant has been informed that the BESS component of the Proposed Development has been re-prioritised with a Gate 1 connection from NESO. This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2023), Paragraph 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, it would not be correct to infer from the current policy position, current capacity ranges and NESO's prioritisation, that the need established by NPS EN-1 does not apply to any scheme or component of a scheme which currently has a Gate 1 connection prioritisation.
1.3.15	REP1-218, REP1-300	**Need for the project substation** Comment that National Grid is replacing its substation and therefore Rosefield does not need its own substation next to it.	The Proposed Development requires the Rosefield Substation to consolidate, manage and make compatible both the electricity generated by the Solar PV development and the electricity stored by the BESS. This does not negate the need for the new National Grid East Claydon Substation.
1.3.16	REP1-145,	**Connection date** Comment that the connection date for the Proposed Development cannot be viable due to existing delays with the replacement East Claydon Substation.	As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** the Applicant has secured a grid connection agreement with NESO, with a current grid connection date of Q4 2031. The Applicant confirms that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive). The Applicant has addressed the need for BESS as established in national policy and in relation to NESO's prioritisation through Ref. 2.1.33 above. The Applicant knows of no obvious reason why a Phase 2 connection will not be achieved.
1.3.17	REP1-218, REP1-300	**Connection date** Comment that as the Rosefield connection date is after 2030 it does not contribute to the UK's clean energy targets.	As set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** the Applicant has secured a grid connection agreement with NESO, with a current grid connection date of Q4 2031. NESO's re-prioritisation of the connections queue has prioritised generation and transmission network infrastructure projects needed for 2030, whilst maintaining a robust pipeline beyond 2030. The Applicant confirms that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive). The Applicant has addressed the need for BESS as established in national policy and in relation to NESO's prioritisation through **Ref. 1.1.33** above. The Proposed Development and its prioritised connection are therefore consistent with existing energy policy and will, if consented, contribute in a meaningful and necessary way to the UK's clean energy targets.

Ref	WR	Summary Position	Applicant's Response
1.3.18	REP1-136	**Connection reform** Comment that the Proposed Development should not be eligible for a Gate 2 offer as it does not have all land finalised and does not have a clear point of connection.	The Applicant disagrees with the contents of this comment. Evidence of the readiness of the Project Development including land rights was submitted to NESO under the Connections Reform process to inform NESO's assessment of its position in a re-ordered connection queue. The Applicant confirms that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive) which means NESO consider the land rights secured by the Proposed Development to be sufficient to demonstrate its readiness and therefore its Gate 2 prioritisation.
1.3.19	REP1-136	**Connection reform** Comment that the Proposed Development has only ever been presented with a storage element and now that the BESS does not have a firm Gate 2 offer it needs to be reconsidered.	The Applicant has always sought consent to include Solar PV development within the area of BESS as an alternative, as shown on the **Works Plans [EN010158/APP/2.3.3] [REP1-005]**, should the BESS not be taken forward. The Applicant has been informed that the BESS component of the Proposed Development has been re-prioritised with a Gate 1 connection from NESO. This means that the Applicant has an agreement with NESO to connect the BESS, but that the date of this connection has not yet been confirmed and is 'indicative'. It is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55). Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"*. Therefore, it would not be correct to infer from the policy position (which has not changed), current capacity ranges and NESO's prioritisation, that the need established by NPS EN-1 does not apply to any scheme or component of a scheme which currently has a Gate 1 connection prioritisation. NPS EN-3 (2023) states that the government is supportive of solar that is co-located with other functions (for example, storage) to maximise the efficiency of land use. (Para 2.10.10).
1.3.20	REP1-136, REP1-145, REP1-146, REP1-149, REP1-167, REP1-288	**TEC Register** Comment that the TEC Register has more solar capacity than required and therefore the Proposed Development should be cancelled.	The Applicant acknowledges reference to the TEC Register but disagrees with the view taken. The Transmission Entry Capacity (TEC) Register is being updated incrementally with the result of NESO's Connections Reform process. The registers are not expected to be fully and completely updated until 2027 at the earliest. NESO's frequently asked questions page https://www.neso.energy/industry-information/connections/help-and-support/faqs explains that only after customers have signed their offers, will NESO update any relevant registers with project details. The TEC Register therefore likely includes projects which were not prioritised in NESO's Connections Reform process. However, it is not the Government's intention that project approvals should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation (NPS EN-1 (2025), Para 3.2.6). Indeed, the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (CP2030, p55) and the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure, that: *"Clean Power 2030 is a milestone that reflects the scale of*

Ref	WR	Summary Position	Applicant's Response
			ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals".
1.3.21	REP1-288	**Replacement substation** Comment that the Applicant has 'taken for granted' that a new substation will be built - even to the extent that the adjacent location has been shown on site maps - but no planning application has been submitted.	The Applicant disagrees that it has 'taken for granted' the East Claydon Project and refers to its response under **Ref. 1.3.17** above.
		Other matters	
1.3.22	REP1-159, REP1-263	**Planning balance** Comment that the residual impacts of the Proposed Development represent exceptional circumstances which outweigh the critical national need for renewable energy.	The Applicant disagrees. The substantial benefits of and need for the Proposed Development are set out in Section 3 of the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016], including the delivery of CNP infrastructure to contribute towards meeting national energy objectives, and this need together with the other beneficial effects of the Proposed Development (set out in Section 3.3 of the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]) outweigh the residual effects when applying the planning balancing exercise to the Proposed Development. There is no requirement to demonstrate exceptional circumstances given that there is an established presumption in favour of the granting consent for CNP infrastructure like the Proposed Development.
1.3.23	REP1-143, REP1-150, REP1-154, REP1-167, REP1-173, REP1-178, REP1-197, REP1-214, REP1-221, REP1-229, REP1-252, REP1-263, REP1-271, REP1-287, REP1-288	**Motive** Comment that the Applicant is motivated by profit.	There is an urgent need for an unprecedented capacity of new low carbon generation schemes to come forward to deliver and sustain a clean power system from 2030, in support of achieving the UK's 2050 net zero target. The **Statement of Need [EN010158/APP/5.6]** [APP-036] explains that, to deliver the 2035 FES-derived capacity range for solar generation, the equivalent of approximately one project the size of the Proposed Development would need to be switched on each and every month (upper range) or every other month (lower range) between the end of 2024 and the middle of 2035. It is within this context that the Applicant is bringing forward the Proposed Development.
1.3.24	REP1-256	**Principle of development** Comment that current infrastructure such as built wind farms are not able to be used to full capacity due to grid constraints, and development should first focus on fixing existing constraints before building new sources of generation.	The Applicant notes the significant work currently ongoing to ensure that the GB electricity network is capable of supporting the government's aims. There is an urgent need for an unprecedented capacity of new low carbon generation schemes to come forward to deliver and sustain a clean power system from 2030, in support of achieving the UK's 2050 net zero target. The Proposed Development is located away from areas of the NETS which are currently experiencing flow constraints and generation curtailment, as described in Section 9.4 of the **Statement of Need [EN010158/APP/5.6]** [APP-036]. This is a key benefit of the Proposed Development's proposed location.
1.3.25	REP1-264	**Principle of development** Comment that the solar farm is being built to hit unrealistic government targets.	The **Statement of Need [EN010158/APP/5.6]** [APP-036] explains that the UK has a legally binding commitment to achieve net zero by 2050. Achieving the government's Clean Power capacity ranges is a stepping stone to this aim. There is an urgent need for an unprecedented capacity of new low carbon generation schemes to come forward to deliver and sustain a clean power system from 2030, in support of achieving the

Ref	WR	Summary Position	Applicant's Response
			UK's 2050 net zero target while also ensuring that UK energy supply always remains secure, reliable and affordable. It is within this context that the Applicant is bringing forward the Proposed Development.
1.3.26	REP1-136, REP1-177, REP1-210, REP1-223	**Need** Comment that the Proposed Development is not needed.	The UK has a legally binding commitment to achieve net zero by 2050. There is an urgent need for an unprecedented capacity of new low carbon generation schemes to come forward to deliver and sustain a clean power system from 2030, in support of achieving the UK's 2050 net zero target. NPS EN-1 (2023) the government concludes that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve Net Zero (Para 4.2.4), and because of the decarbonisation, energy security, and affordability benefits that they deliver. NPS EN-1 also states that the SoS should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the SoS is not required to consider the specific contribution of any individual project to be satisfied that need is established (Paras 3.2.6 to 3.2.8). It is within this context that the Applicant is bringing forward the Proposed Development.
1.3.27	REP1-178, REP1-229	**Need** Comment that the Applicant is a foreign business and therefore profit from the Proposed Development will not even benefit the UK.	The **Statement of Need [APP-036]** concludes that, if consented, the Proposed Development would contribute to continuing the UK's decarbonisation and security of supply efforts to meet anticipated increases in electricity demand from non-traditional sectors in the 2030s. This will be a significant benefit to the UK.
1.3.28	REP1-219	**Lifespan** Comment that the lifespan of the Proposed Development is too short compared to the negative environmental effects it would have.	A 40-year period for the operation (including maintenance) phase of the Proposed Development is common for DCO-scale solar projects. As set out in section 10 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**, 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. Furthermore, and as detailed in paragraph 8.11.2 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, the Proposed Development is expected to generate approximately 12,030,492 MWh of electricity over its 40-year operational life, with total lifecycle emissions estimated at 1,191,562 tCO_2e. The Proposed Development would provide electricity to the national grid that may otherwise be generated by processes with higher carbon intensities. The environmental benefit of the Proposed Development is therefore the replacement of electricity generation from fossil fuels, resulting in a reduction in greenhouse gas emissions and a contribution to climate change mitigation. When compared with equivalent gas-fired electricity generation, this equates to net greenhouse gas savings in excess of 3 million tCO_2e, even when emissions related to construction and manufacturing are taken into account.

Ref	WR	Summary Position	Applicant's Response
1.3.29	REP1-208	**Need** Comment that people in the UK will not benefit from the power generated by the Proposed Development.	The **Statement of Need [EN010158/APP/5.6]** **[APP-036]** concludes that, if consented, the Proposed Development would contribute to continuing the UK's decarbonisation and security of supply efforts to meet anticipated increases in electricity demand from non-traditional sectors in the 2030s. This will be a significant benefit to the UK.

Table 2-1: Biodiversity and Ecology (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
2.1.1	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment noting that many of the surveys undertaken are now approaching or beyond the typical two-year validity window, and some were carried outside of optimal seasons. Further comment noting missing or inadequate surveys for terrestrial invertebrates and reptiles, stating that effects can't be deemed "not significant" without targeted survey data and population informed mitigation.	The Applicant notes that this comment is not accurate as the CIEEM guidance note[1] 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. Notwithstanding this as detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, the Applicant considers the ecological survey effort is adequate to inform a complete and detailed assessment that fully considers impacts the ecological receptors as provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. In addition the **Outline CEMP [EN010158/APP/7.2.3]** secures a commitment to pre-construction surveys where applicable. As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, the presence of both black and brown hairstreak butterflies has been assumed within the Order Limits given the Blackthorn resource present and appropriate mitigation to safeguard hairstreak butterflies will be implemented as detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, and secured within **Outline CEMP [EN010158/APP/7.2.3]** and **Outline LEMP [EN010158/APP/7.6.3]**. The **Outline CEMP [EN010158/APP/7.2.3]** also makes a commitment to survey all hedgerow sections to be removed for hairstreak species so that the sections containing overwintering eggs and pupae can be safeguarded and translocated as required. Appropriate survey work will be outlined in the detailed Construction Environmental Management Plan(s), in consultation with relevant stakeholders. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has not identified any significant effects on invertebrate species. Targeted survey work for other invertebrate species has not been undertaken, on the basis that habitats most likely to support specialist invertebrates have been mainly (hedgerows and individual tress) or all (ancient woodland) retained and that the habitat directly affected (arable and modified grassland) is highly unlikely to support an invertebrate assemblage of any importance. The habitat creation and enhancement measures outlined in the **Outline LEMP [EN010158/APP/7.6.3]** would benefit the invertebrate assemblages present. As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, **RR-026 page 35,** survey work carried out has not highlighted any habitat of significant value to reptiles. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has taken a precautionary approach and assumed that a small population of species such as slow worm could be present, with safeguards outlined in the **Outline CEMP [EN010158/APP/7.2.3]** preventing any likelihood of harm during the construction phase. It should also be recognised that the design of the Proposed Development, with the retention of all woodland habitat and the majority of hedgerows with significant buffers, would likely safeguard the habitat areas most likely to be used by reptiles. In addition, habitat creation and enhancement proposals outlined in the in the **Outline LEMP [EN010158/APP/7.6.3]** would likely benefit reptiles.

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

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
2.1.2	CSAG (Page 63, Row 3 and Page 84, Para. 2)	Comment noting that aggregating bird species into broad receptor groups and relying on limited mitigation measures (such as field-margin seed mixes) means the Environmental Statement masks impacts on bird species and reaches an untenable conclusion of non-significant residual effects despite the Applicant's own wintering bird survey findings.	The full detailed assessment of the potential impacts wintering and breeding birds is detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].** The Applicant has grouped certain species together such as wintering and breeding species as well as those protected under Schedule 1 of the Wildlife and Countryside Act to understand more fully the predicted impacts. Assessing each species individually would not provide additional clarity as the likely impacts would be similar nor would it change the mitigation proposals. A whole suite of mitigation measures has been proposed including retention of woodland and hedgerow habitat, provision of open ground for ground nesting species, winter seed provision and improving invertebrate biodiversity within fields containing panels. The full suite of mitigation is outlined and secured by the **Outline LEMP [EN010158/APP/7.6.3]** and **Design Commitments [EN010158/APP/5.9.4]**.
2.1.3	CSAG (Page 64, Row 2)	Comment noting continued concern with the Applicant's survey coverage of arable plants and that the CSAG remains less than convinced that the baseline for this species group is robustly documented to allow for the scoping out of effects on this receptor.	Survey for notable arable plants was undertaken at the appropriate time of year by an experienced botanist with Field Identification Skills Certificate (FISC) level 4, and the list of species recorded is a true reflection of what surveyors recorded on-site. Also, it was noted a lot of arable margins had been grassed down and that the interface between grass margins and arable crops was often 'clean'; indicating herbicide use, both actions reducing the potential for scarce arable weeds to be present . A lack of notable arable plants recorded does not mean that a thorough consideration was not given, rather that these species were not present.
2.1.4	CSAG (Page 65, Row 2)	Comment noting that, with regard for barn owl, red kite and hobby, the Applicant has sought to downplay/scope out potentially significant effects despite relying on limited or inadequate evidence. Further comment that this reflects a non-precautionary approach that is inconsistent with best-practice Environmental Impact Assessment (EIA).	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has fully acknowledged the importance of these Schedule 1 species, reflected by characterising them as a separate receptor in their own right from other birds, and has fully assessed all potential impacts that could occur to these species as a result of the Proposed Development for all three phases (construction, operation (including maintenance) and decommissioning). Appropriate embedded and additional mitigation to safeguard and protect these species is clearly detailed within and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3].** Therefore, the Applicant is confident that taking into account all of the above there will be no residual significant impacts to these species.
2.1.5	CSAG (Page 65, Row 3 and Page 85, Para. 3)	Comment noting that fish and aquatic invertebrates ought to have been scoped into the assessment and that the decision to scope these receptors out is non-precautionary and flawed, particularly so with the proximity of the BESS to the Claydon Brook and that otter and water vole have been scoped in.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** Table 7.4**,** these receptors were not specifically included for consideration within **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]**, because no ponds, ditches or watercourses will be lost to the Proposed Development. There will be a minimum 10m offset buffer from all ponds, ditches and watercourses, as detailed and secured within the **Design Commitments [EN010158/APP/5.9.4]**. Mitigation measures to protect watercourses (e.g. from pollution) are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**. Aquatic invertebrate and fish species are therefore considered unlikely to be affected during construction, operation (including maintenance) or decommissioning and have been scoped out of the assessment.
2.1.6	CSAG (Page 65, Row 4 and Page 85, Para. 3)	Comment noting that scoping brown hare out of the assessment is also unjustified and that the Applicant's assumption that suitable fencing will mitigate	Brown hare were scoped out of the ecological assessment within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** as no significant impact pathways were identified. Fencing would be on the inside of each field with sizeable buffers from hedgerows and woodland which

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		displacement effects on-site is not sufficient in the absence of robust evidence.	would enable wildlife such as hares to move between fields across the wider landscape. In addition, fencing would not be buried so smaller mammals such as hares would be able to push underneath the fencing at low points to access fields to forage. The mitigation proposed within the **Outline LEMP [EN010158/APP/7.6.3]** including large areas of planting and grassland creation, to address the impacts of the Proposed Development on hares is robust and sufficient to address the issue of potential displacement and ensure connectivity, enabling species to move across the landscape. In addition, based on anecdotal experience of solar farms in the Bristol vale, it's apparent that hares, badgers and muntjac deer do push under the fence, often adjacent to carefully sited mammal gates.
2.1.7	CSAG (Page 66, Row 2 and Page 79, Row 2 and Page 85, Para. 2)	Comment noting that it is highly unlikely that the Applicant has not been able to identify any priority arable field margin habitats across the Order Limits. Further comment raising concern with the rigour of the baseline surveys and the ability to draw an accurate BNG calculation.	There is a confusion between arable margins and margins supporting scarce arable weeds. The majority of the arable fields have sown grass margins supporting a moderately diverse assemblage of meadow plants such as common knapweed but no scarce arable weeds were identified as presented within **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093]** Survey efforts for notable arable plants were undertaken at the appropriate time of year by an experienced botanist with Field Identification Skills Certificate (FISC) level 4, and the list of species recorded is a true reflection of what surveyors recorded on-site. It was noted a lot of arable margins had been grassed down and that the interface between grass margins and arable crops was often clean indicating herbicide use, both actions reducing the potential for scarce arable weeds to be present. A lack of notable arable plants recorded does not mean that a thorough consideration was not given, rather that these species weren't present and therefore could not be recorded.
2.1.8	CSAG (Page 67, Row 2)	Comment noting the Applicant's breeding bird surveys are regarded as significantly underestimating the number of territories across the Order Limits. Further comment noting that the CSAGs own walkover suggests a ground nesting bird population that may double that of the Applicant's figures.	The Applicant does not agree that the survey results have underestimated the number of ground and other nesting birds. Instead, the Applicant has based the mitigation requirement on the number of birds observed. As presented in the **Outline LEMP [EN010158/APP/7.6.3]** paragraphs 5.5.22 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 survey (473ha) but the actual area to be occupied by solar PV is only 279ha and it is estimated that this area supports 37 breeding pairs. Therefore, mitigation is based on the requirement to mitigate for 37 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**.**
2.1.9	CSAG (Page 68, Row 2 and 3)	Comment noting that the Applicant's inference that in-field habitats are of low value to bats is unsound, as in-field detectors inherently record less activity due to limited sampling coverage, making direct comparison with hedgerow detectors unreliable and biased. Further comment noting that higher recorded hedgerow activity risks misrepresenting bat usage of grazed fields.	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, the Applicant has already undertaken additional studies which were submitted at Deadline 1 (see **Bat Technical Study [EN010158/APP/8.5] [REP1-105]**). The limitations raised are noted.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
2.1.10	CSAG (Page 69, Row 1 and Page 78, Row 2)	Comment questioning the Applicant's conclusion that Barbastelle and Leisler's bats are of no more than district and local importance respectively. Further comment raising concern with the lack of precaution taken by the Applicant to take a precautionary approach in the mitigation hierarchy.	The valuation of bats is in line with the Bat Mitigation Guidelines[2], and is based on multiple years of survey work carried out for HS2 as well as that carried out for the Proposed Development. Table 7.6 within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] s**ets out how the mitigation hierarchy has been applied primarily by avoiding key habitat such as woodland and the majority of hedgerows.
2.1.11	CSAG (Page 69, Row 2 and Page 70, Row 2 and Page 74, Row 3 and Pages 75 and 76 and Page 80, Rows 1 and 2 and Page 81, Row 3 and Page 83, Para. 4)	Comment noting that sparse paired-detector and static-detector coverage cannot support the Applicant's suggestion that in-field bat use is negligible. Further comment that key questions about connectivity between important woodlands remain unanswered and that this reinforces concerns about the Applicant's non-precautionary approach to placing solar PV within Bechstein's and barbastelle core sustenance zones and home ranges.	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, the Applicant has already undertaken additional studies which were submitted at Deadline 1 (see **Bat Technical Study [EN010158/APP/8.5] [REP1-105]**). The Applicant disagrees that a non-precautionary approach has been undertaken, and panels have been removed to provide additional mitigation. The mitigation has been designed on a landscape-scale ensuring that commuting is protected and foraging is improved compared to the current situation.
2.1.12	CSAG (Page 77 and 78, Row 3)	Comment noting that the Applicant's review of polarised light effects on invertebrate prey is shaped by 'could' 'might' and 'may' terminology which reflects the uncertainty of this impact. Further comment noting that such uncertainty should drive a greater precautionary approach. It is recognised that anti-reflective coatings on panels may act as a form of mitigation, but no commitment is made to adopt such mitigation.	The Solar PV modules would be bifacial with an anti-reflective coating, to reduce light polarisation impacts and thereby reduce the impact on invertebrate species, detailed within and secured by the **Design Commitments [EN010158/APP/5.9.4]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has not identified any significant effects on invertebrate species, taking into account available literature. Please refer to **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] RR-026 page 33** for further detail on this point.
2.1.13	CSAG (Page 69, Row 2 and Page 70, Row 1 and Page 70, Row 2)	Comment noting that survey coverage across individual parcels (and along cable corridors) would be considered inadequate if assessed as standalone sites, meaning that potentially significant bat and bird impacts have not been evaluated within the Environmental Statement.	As previously stated within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, the habitats present within the Cable Corridors are in no way any more remarkable than the habitats present within the Parcels where other infrastructure is proposed to be sited, therefore the Applicant is confident that potential impacts on bats and birds can be robustly determined based on the studies that have been carried out across the rest of the site. Construction works undertaken within the Cable Corridors will be short term and temporary, with mitigation detailed within **Outline CEMP [EN010158/APP/7.2.3]** considered more than sufficient to mitigate any potential impacts that may occur during this short duration of works. The Cable Corridor areas will be returned to current use following completion of works and therefore the areas of land will be once again able to be used by these species as is currently used.
2.1.14	CSAG (Page 71, Row 1 and Page 84, Para. 2)	Comment noting that the Applicant overlooks clear evidence that skylark, lapwing, golden plover and other open-country birds are displaced by solar PV and still downplays impacts on these species. Further comment	The Applicant in no way has downplayed the potential displacement of open country birds by Solar PV modules. It should be noted that golden plover and lapwing were recorded during the winter months only, when the UK receives a large number of wintering species from the continent. During the winter these two species are wide ranging and often use fields for a limited number of

[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.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		noting that this has resulted in an inadequate assessment and a failure to apply the mitigation hierarchy to the benefit of these receptors.	days only. Given the extent of grassland, winter stubble and ploughed fields available across the UK during the winter months, displacement of these species from the local vicinity due to the placement of solar panels would not result in a significant effect nor would it be likely to limit or reduce the number of these species that overwinter in the UK. Breeding skylark will certainly be displaced and the **Outline LEMP [EN010158/APP/7.6.3]** has identified a suite of mitigation measures to address this. In addition to the above the 95ha set aside for skylark and other ground nesting birds will also provide additional habitat for wintering lapwing and golden plover.
2.1.15	CSAG (Page 73, Row 2 and Page 79, Row 4 and Page 84, Para. 2)	Comment noting that the Applicant aggregates displaced wintering species under a generic 'wintering birds' receptor group and then relies on habitat creation without due consideration for displacement effects of the Proposed Development. Further comment noting that this leaves important receptors outside of the ES and leads to inadequate compensation measures for wintering lapwing, golden plover and associated raptors and owls.	The full detailed assessment of the potential impacts wintering and breeding birds **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].** The Applicant has grouped certain species together such as wintering and breeding species as well as those protected under Schedule 1 of the Wildlife and Countryside Act to understand more fully the predicted impacts. Assessing each species individually would not provide additional clarity as the likely impacts would be similar. As outlined above, wintering species are highly mobile, moving regularly in search of food. Retention of all woodland habitat and the majority of the hedgerow network and associated buffers maintain the food resource that many wintering birds rely on whilst the provision of open ground habitat as discussed in the row above together with additional provision of a source of winter seed will maintain conditions for wintering birds. The full suite of mitigation is outlined and secured by the **Outline LEMP [EN010158/APP/7.6.3].**
2.1.16	CSAG (Page 74, Row 2)	Comment noting that while the Applicant's assessment emphasises barbastelle bat hedgerow use, it fails to explain why they commute into the Order Limits along hedgerows. Further comment noting such bats are likely to forage in woodlands, hedgerows and also in field margins and grazed pasture.	Barbastelle use linear features such as hedgerows for commuting and foraging but will also be using a variety of resources within their large Core Sustenance Zone as the seasons change and different resources are available in different places. They can use open areas for foraging, but the value of arable crops tends to be limited due to their management and (usually) use of pesticides. The mitigation for the Proposed Development has been designed on a landscape-scale ensuring that commuting is protected and foraging is improved compared to the current situation. Therefore, as outlined within **Outline LEMP [EN010158/APP/7.6.3]** the retention of all woodland habitat, the majority of hedgerows and the provision of wide buffers along these features together with sensitive long term management will actively protect and safeguard those features that foraging bats use and result in an overall betterment**.**
2.1.17	CSAG (Page 74, Row 4)	Comment noting it is not clear why the Applicant's scopes out operation (including maintenance) phase effects on wintering birds.	The Applicant has provided an assessment for potential impacts to wintering birds during the operation (including maintenance) phase of the development within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** at paragraphs 7.8.103-7.8.106 and 7.10.127-7.10.130**.** It should be recognised that during the operation (including maintenance) phase, solar development is relatively passive with maintenance activities being limited and with the retention of habitat features such as woodland and hedgerow and other measures outlined in the **Outline LEMP [EN010158/APP/7.6.3]** no significant impacts on wintering birds are anticipated.
2.1.18	CSAG (Page 77, Row 2)	Comment noting that evidence referenced by the Applicant in the Biodiversity Chapter provides an assumption that over 25% of Bechstein's bat foraging activities take place in non-woodland habitats which,	The Applicant is in agreement that open non-woodland habitats are clearly important for Bechstein's bats. Hence, as outlined within the **Outline LEMP [EN010158/APP/7.6.3]** the Applicant has identified areas for the creation of grassland without Solar PV modules linked by commuting corridors comprising wide buffers around hedgerows and woodland to enable bats to

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		when taken together with the Applicant's surveys, gives limited confidence that open fields within the Order Limits are unimportant to this species.	move around the landscape and find open areas to forage. The mitigation has been designed on a landscape-scale ensuring that commuting is protected and foraging is improved compared to the current situation. It should also be noted that large parts of the Order Limits, such as the Cable Corridors will be returned to arable farmland following short term temporary impacts (with mitigation measures provided within the **Outline CEMP [EN010158/APP/7.2.3]** to offset these temporary impacts) and will also be available for bats to use for foraging as they do currently.
2.1.19	CSAG (Page 77, Row 2)	Comment noting that there can be no confidence in the Applicant's cumulative assessment statement with regard for the unmitigated impacts of the Proposed Development in combination with those other local projects within the core sustenance zone of Bechstein's and/or barbastelle bats.	The Applicant does not agree with the statement that the Proposed Development is unmitigated. The Proposed Development has been thoroughly designed to include sufficient mitigation for bats and ground-nesting birds, retaining key habitat features and mitigation enabling continued use of the landscape as presented in the **Outline LEMP [EN010158/APP/7.6.3].** A detailed cumulative assessment has been undertaken for biodiversity and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].**
2.1.20	CSAG Appendix (Pages 67 - 74)	Appendix 'Natural England's Technical Information Note TIN066' included within the WR.	The Applicant acknowledges the Technical Information Note submitted as an Appendix to CSAGs WR and confirms that **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has given regard to this. The **Outline LEMP [EN010158/APP/7.6.3]** has taken account of the potential challenges with creating grassland on former arable, for example high nutrient status and the habitat creation proposals and management prescriptions advocated are considered pragmatic and deliverable.
2.1.21	Natural England (Page 8)	Comment querying the Applicant's point about lower consequences beyond the audible range of bat detection equipment, given that this is not a scientifically valid point as we only know what the equipment can detect and not what a bat can actually hear.	The Applicant agrees that the evidence of what a bat can actually *hear* is limited at the current time (particularly at lower frequencies). However, 'hearing' a noise is not the same as being disturbed by it. In addition, and importantly, a bat cannot hear a noise if the source of that noise is far enough away to attenuate over the distance between it and the bat (based on the physics of sound, not speculation). More weight has been placed on that than on what a bat can (theoretically) hear. In this area, there has been significant construction noise (as well as disruption caused by large numbers of contractors, vehicles and plant movement and unprecedented habitat change) due to HS2 for several years. The construction noise has included traditional piling along the edge of Sheephouse Wood, an activity very much more disturbing than the mini-piling proposed as part of the Proposed Development. From the surveys undertaken to date, it has not been possible to attribute negative change due to this disruption. In fact, the bat-box surveys undertaken in Finemere/Sheephouse Wood for HS2 demonstrate that Natterer's bats are thriving despite the ongoing HS2 works. In addition, we have recorded a maternity roost of common pipistrelles in a substation which generates significant noise to human ears, but at a low frequency. Either they have habituated to this noise or they cannot hear it. Therefore, the Applicant has confidence in the noise assessment undertaken it being evidence based rather than mere speculation. Please see **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** submitted at Deadline 1 for further information.
2.1.22	Natural England (Page 8)	Comment accepting measuring from the centre line for creation and mapping of buffers, but disappointment expressed about the reductive outcome of this approach	Measurements for hedgerow buffer are taken from hedgerow centrelines with the measurement being offset either side from centre line of hedgerows within the Order Limits. This is the most consistent and accurate way to measure buffers from a fixed point (as well as being

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		and that an increase by a minimum of 2m would resolve the issue.	realistic/achievable on-site), which maintains the intended ecological buffer. The request for 'an extra two metres' does not take into account the distance between the security fence and first row of panels and is not evidence-based. In addition, measuring a buffer from the outer edge of a hedge provides a disincentive to relax future management and allow hedges to grow outwards and mature (as the Applicant has advocated) as it could be argued that this reduces the width of the buffer which would require constant adjustment during the operation (including maintenance) phase and is therefore untenable. Please also refer to **Ref. 2.1.23** below response for further detail.
2.1.23	Natural England (Page 9)	Comment about the 5m access strip from the security fence to the Solar PV modules sitting independently of the LEMP, noting that they don't accept this as it constitutes further physical distance between the Solar PV modules and the hedgerow feature.	A response has previously been provided within **page 202** of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. Natural England has not taken into account that there is an additional 5m from the security fence to the first set of panels. However, that depends on whether the buffer zones are to maintain connectivity or provide a foraging resource. The Applicant has proposed buffer zones to maintain connectivity, and specifically to minimise the risk of displacement to commuting bats. Commuting routes are protected by wide buffers that are wider than the distance over which the echolocation calls of Bechstein's bats are likely to operate, giving some indication that the proposed width of these buffers should be adequate/effective. In any case, the 'additional' 5m strips would not be intensively managed but sown to meadow and (where achievable) lightly grazed and would likely support an increase in invertebrates adding to the bat foraging resource.
		Effects on Species and Habitats	
2.1.24	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment noting the Proposed Development poses the risk of fragmentation of habitats, with significant adverse effects on bats and birds.	Comment is noted and the Applicant has outlined a suite of mitigation measures to address impacts on landscape connectivity and other impacts related to bats and birds. A response has previously been provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] RR-026**, with mitigation measures secured within the **Outline LEMP [EN010158/APP/7.6.3].**
2.1.25	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment requesting the removal of Solar PV modules from Fields D28 and D29 due to the critical flight lines which pass through them.	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 partially in 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 D30-37) 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].**
2.1.26	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment requesting wider "green corridors" along all key/anticipated bat routes as the proposed 10m offsets from hedgerow are deemed insufficient. Further comment about research suggesting solar farms reduce bat activity and alter feeding behaviour, therefore the risk of significant harm needs appropriate mitigation.	Firstly, in addition to the 10m offsets from the majority of hedgerows (the offset is greater in some locations (see **Ref. 2.1.39** below) there is also a 5m buffer from the edge of the panels to the security fence giving a total buffer width of 15m either side of hedgerows in addition to 30m buffers from Sites of Special Scientific Interest (SSSIs) and Ancient woodland so green corridors have been incorporated into the design. Very much taking into account the foraging behaviour of bats and double the amount of grazed grassland habitat, as well as providing buffers along

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			hedgerows and woodland habitat that relate to the effective range of Bechstein's bats echolocation range**.** 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]** and the review of this literature will be submitted as an Appendix to the Applicants response to the first written questions. However, as stated within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** (see **Ref. 2.1.39** below**)** and **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, 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 precautionary approach has been applied to the assessment 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.
2.1.27	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment disputing finding of no significant residual effect for ground nesting or other bird groups. Further comment that assumption that only territories underneath Solar PV modules are affected severely underestimates impact, and proposed compensation via limited creation of species rich grassland is unlikely to be adequate.	As presented in the **Outline LEMP [EN010158/APP/7.6.3]** paragraphs 5.5.22 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 survey (473 ha) but the actual area where ground nesting birds will likely be displaced by Solar PV panels is only 279ha and it is estimated that this area supports 37 breeding pairs. Therefore, mitigation is based on the requirement to mitigate for 37 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**.** With the implementation of the proposed mitigation the residual effects are considered unlikely.
2.1.28	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment stating that avoidance should be sought before mitigation and that where significant harms remain likely (notably for bats, ancient woodland, and ground nesting/wintering birds) permission should be refused.	The Applicant has sought to 'avoid' impacts wherever practicable, hence why all woodland habitat has been retained along with the majority of hedgerows. Mitigation outlined in **Outline LEMP [EN010158/APP/7.6.3]** has focused on maintaining bat commuting and foraging routes as well as open ground foraging habitat and measures to ensure continued nesting and forging opportunities for bird species, as well as supporting a range of other species. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** confirms that, across all phases of the Proposed Development, there would be no loss of ancient woodland and, therefore, no need to mitigate this, although 8ha of new woodland will be planted. The **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]** has treated these features as

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			primary constraints, seeking to avoid impacts wherever practicable. There are no impacts on any ancient trees or ancient woodland, and the Proposed Development layout has been iteratively refined to minimise effects on veteran trees. With the above in mind, Sections 9.16, 9.26 and 10 of the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] conclude that the Proposed Development complies with the relevant biodiversity planning policies and that, on balance, 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 ES sets out, are limited. Furthermore, and with specific regard for the key planning policies, Paragraphs 5.4.42 and 5.4.43 of NPS EN-1 (2023) outline the key tests in the application of the mitigation hierarchy which is to avoid 'significant harm' to biodiversity and geological interests, and that avoidance of such harm should include the consideration of alternatives. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** both confirm that identified potentially significant effects do not amount to 'significant harm' and so this means that the Proposed Development is compliant with the relevant policy tests.
2.1.29	CSAG (Page 61, Row 1)	Comment noting that uncertainty around whether livestock grazing will continue across the Site creates gaps in assessing the Proposed Development's impacts on bats, invertebrates and birds, given the evidenced importance of cattle grazing to the local Bechstein's bat population. Further comment that the Outline LEMP's default to mowing does not replicate the ecological value of grazing and that replicating current grazing conditions should be secured if consent is to be granted.	The Applicant intends to use grazing as a management tool but mowing is a backup option. As outlined in the **Outline LEMP [EN010158/APP/7.6.3]** it is proposed that mitigation areas be cattle grazed to ensure no net loss of cattle grazed grassland habitat. The design of the Proposed Development takes into account the foraging behaviour of Bechstein's bats and therefore the importance of open foraging habitat for Bechstein's bats has been fully recognised.
2.1.30	CSAG (Page 61, Row 3)	Comment noting the setbacks of the Proposed Development to hedgerows are not clear as to where these are measured from (i.e., centre line or edge) and that establishing species-rich grassland on heavy clay soils with a legacy of arable cultivation will be challenging to create. Further comment that these field margin habitat's benefits may be overstated.	Measurements for hedgerow buffer are taken from hedgerow centrelines with the measurement being offset either side from centre line of hedgerows within the Order Limits, as this is 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. See **Ref. 3.1.22** above. The detailed Landscape and Ecological Management Plan will provide further information regarding the establishment on long-term management prescriptions taking into account the soil conditions. Many of the margins have already been grassed down and support a moderate diversity of wild plant species including birds foot trefoil and knapweed and what the Applicant is proposing to create is broadly similar being pragmatic about what can be created.
2.1.31	CSAG (Page 63, Row 1)	Comment welcoming the operation (including maintenance) phase monitoring of bat activity with further comment requesting a commitment be made to review the locations of solar PV with the ability to removal panelled areas should significant effects be recorded.	The Applicant is not proposing to commit to removal of Solar PV modules in the unlikely event that monitoring indicates a negative effect. The structure of the bat monitoring strategy will follow that

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			outlined in Ch9 of the Bat Mitigation Guidelines[3]; this requires meaningful objective, specific tests of those objectives and remedial actions to be specified. Should negative impacts be identified remedial actions will depend on which tests are not being met; the reasons why those test(s) are not met; and whether or not those reasons are within the applicants control. This could include measures such as refining habitat management to deliver more invertebrate biomass to increase prey availability. Such measures would be agreed in consultation with Natural England and the relevant planning authority. As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006],** 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.
2.1.32	CSAG (Page 63, Row 3)	Comment noting that around half of the Order Limits' area would become unsuitable for many ground-nesting birds and that this would lead to a significant displacement of the local population. Further comment that the provision of circa. 95ha of grassland does not realistically offset this displacement effect.	As presented in the **Outline LEMP [EN010158/APP/7.6.3]** paragraphs 5.5.22 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 survey (473 ha) but the actual area where ground nesting birds will be displaced by Solar PV modules is only 279ha and it is estimated that this area supports 37 breeding pairs. Therefore, mitigation is based on the requirement to mitigate for 37 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**.**
2.1.33	CSAG (Page 68, Row 4 and Page 85, Para. 5)	Comment noting that the home range information for Bechstein's bat should have been used to determine that solar PV would not be placed in home range areas (Parcels 1, 1a and 2). Further comment raising concern with the impact of this overlap being, at best, uncertain.	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 the Natural England NECR558 report as one of 'the most frequently used nonwoodland 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]**.
2.1.34	CSAG (Page 72, Row 3 and Page 74, Row 3 and Page 79, Row 3)	Comment noting the Applicant's embedded mitigation for ground nesting birds but that such creation would represent a 76% decrease in available habitat for species such as breeding skylark, and wintering lapwing and golden plover. Further comment that the Applicant's	For wintering lapwing and golden plover see comments in rows above. With regards skylark as presented in the **Outline LEMP [EN010158/APP/7.6.3]** paragraphs 5.5.22 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 survey (473ha) but the actual

[3] 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.

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		mitigation is instead compensation for the displacement of ground nesting birds and that such compensation falls short of the Proposed Development's displacement effects. Further comment that the assessment fails to consider whether the compensation areas already support ground nesting birds and, therefore, whether such areas have capacity for additional territories. Further comment that the displacement effect on ground nesting birds has not been fully or suitably assessed in the Environmental Statement.	area where ground nesting birds will be displaced by Solar PV development is only 279ha and it is estimated that this area supports 37 breeding pairs. Therefore, mitigation is based on the requirement to mitigate for 37 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 as well as providing habitat for wintering species. 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**. Outline LEMP [EN010158/APP/7.6.3]** indicates that with appropriate management solar farms can continue to support a diverse range of breeding bird species**.** It is likely that habitats set aside for mitigation will already support some ground nesting species but that with appropriate management, the carrying capacity could be increased. In addition, the full suite of mitigation measures indicated in the **Outline LEMP [EN010158/APP/7.6.3]** including increasing the botanical diversity and hence invertebrate diversity under panels during the breeding season as well as the provision of a source of winter seed will add to this. Recent work by the RSPB[4] has shown that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape which is what we are starting with here.
2.1.35	CSAG (Page 80, Row 3)	Comment noting that the Environmental Statement fails to quantify cumulative displacement of farmland birds across the relevant cumulative projects and instead relies on unevidenced assumptions that each will provide adequate compensation or that displaced birds can be accommodated elsewhere locally. Comment noting that, given the Proposed Development's likely significant displacement of ground-nesting and wintering birds, there is a risk of substantial cumulative impact which the Environmental Statement does not demonstrate or address.	The Applicant has fully assessed cumulative impacts. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** makes it clear where other developments have identified farmland birds as a receptor and describes the nature of the mitigation proposed. Finally, the Applicant is confident that it can mitigate for its own impacts and as such the potential for residual impacts is further reduced.
2.1.36	CSAG (Page 82, Row 2)	Comment that no non-significant cumulative effects conclusions can be reached for ground nesting and wintering birds across the construction and operation (including maintenance) phase due to the Applicant's flawed approach to assessment.	The Applicant has undertaken its assessment in accordance with good practice and guidance as outlined in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and as outlined above is confident that the Proposed Developments residual impacts have been minimised.
2.1.37	CSAG (Page 115, Para. 5.6.17)	Comment noting that the Landscape and Visual Chapter's assumption that native wildflower meadows will establish is unrealistic because the Order Limits' nutrient-rich clay soils are unsuitable for low-fertility hay meadows. Further comment that topsoils would need stripping to create	The Applicant has been pragmatic about the diversity of grassland that could be established and been modest in the assumptions regards what final habitat condition would be achieved and is suggesting other neutral grassland with a moderate diversity of species and not lowland meadow. Many of the margins have already been grassed down and support a moderate diversity of wild plant species including bird's foot trefoil and knapweed and what the Applicant is proposing to

[4] Solar farm management influences breeding bird responses in an arable dominated landscape. Joshua P Coping et al, Bird Study 2025, Vol 2.No 3, 217222. Paper by RSPB and Cambridge University.

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		appropriate conditions and that hay-meadow flowers do not do well in shade and thus will struggle under panels.	create is broadly similar, giving confidence in what can be created, whilst also being pragmatic about what can be created. Detailed soil nutrient levels will be carried out construction and **Outline LEMP [EN010158/APP/7.6.3]** makes provision for nutrient reduction should this be required that does not involve topsoil striping**.** The detailed Landscape and Ecological Management Plan will provide further information regarding the establishment on long-term management prescriptions taking into account the soil conditions.
2.1.38	Natural England (Page 3)	"Comment noting the rare bat populations present and highlighting concerns that without proper mitigation there could be an adverse impact on Annex II bat species. Further comment that the concerns raised in their relevant representation have not been addressed by further survey effort, and despite some progress from the Applicant's side, concerns regarding the impacts to bats from developing the grassland field parcels between Sheephouse Wood and Shrubs Wood remain".	This introductory statement ('without proper mitigation') does not take into account the design changes that have been made and the mitigation proposed. It also does not take into account that the majority of the land that will support panels is currently arable. The value of arable crops tends to be limited due to their management and (usually) use of pesticides that are designed to reduce invertebrate biomass. The mitigation has been designed on a landscape-scale ensuring that commuting is protected and foraging is improved compared to the current situation. As outlined within the **Outline LEMP [EN010158/APP/7.6.3]** the retention of all woodland habitat, the majority of hedgerows and the provision of wide buffers along these features together with sensitive long-term management will actively protect and safeguards those features that foraging bats use and result in an overall betterment
2.1.39	Natural England (Pages 6 and 7)	Comment noting that recommendations 1 and 6 have not been accepted by the Applicant. Further comment noting that recommendation 1 involves retaining fields B6, B7 and B8 to provide a suitable grazed, sheltered and connected location where habitat enhancement measures could mitigate for impacts elsewhere. Removal would have a negative impact on the movement of Bechstein's bats and invertebrates.	The Applicant is aware that fields located between Sheephouse Wood SSSI and Shrubs Wood form an 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, 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]**, **RR-203 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 recognising that these hedgerows provide key routes for commuting and foraging bats, with 30m offset 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 modules to foraging and commuting bats and ensure the connectivity between these woodlands is maintained, secured via the **Outline LEMP [EN010158/APP/7.6.3].**
2.1.40	Natural England (Page 7)	Comment welcoming recommendation 4 but suggesting that it would be beneficial for some grazing in spring and summer to ensure continuity in prey abundance for bats.	The **Outline LEMP [EN010158/APP/7.6.3]** has made a commitment to the continuation of grazing management where possible and indicates that the final prescriptions in the detailed Landscape and Ecological Management Plan will be agreed in consultation with Natural England and the Local Planning Authority. It may therefore be possible to implement grazing management in the spring and summer, and this will be detailed in the detailed Landscape and Ecological Management Plan.
2.1.41	CSAG (Page 145, Para. 8.10)	Comment noting that the Glint and Glare assessment does not consider ecological effects.	The issue of polarised light reflection on ecological receptors has been considered within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and a detailed response given within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**,(**RR-020**

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			page 296) which concludes no significant effect due to modern Solar PV modules being coated to reduce the reflection of polarised light.
Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features			
2.1.42	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment opposing the siting and scale of the Proposed Development due to location within the Bernwood Biodiversity Opportunity Area.	The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] sets out the reasoning for the Proposed Development, including its size and location. Furthermore, and as detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), the location and design of the Proposed Development is the result of a comprehensive site selection process that was environmentally, technically and planning-led to avoid and minimise the potential impacts of the Proposed Development. As set out in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), ecology and biodiversity considerations formed part of the wider environmental and planning constraints which influenced the selection of the site, alongside a number of other site selection criteria within NPS EN-3 (2023). Additional to the above, the Applicant considers that habitats and management of habitats in the post-construction scenario would actually meet a number of the Bernwood Biodiversity Opportunity Area aims; namely: • Proposed enhancement and creation of ponds within the Bernwood Biodiversity Opportunity Area; and • 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.
2.1.43	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment noting the proximity of the Proposed Development to a cluster of SSSIs and Local Wildlife Sites (LWS), including Finemere Wood SSSI and Sheephouse Wood SSSI. Further comment that the Proposed Development risks severing ecological connectivity between these core habitats.	As stated on numerous occasions within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] (for example RR-208 Page 37), 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]** 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. In its Relevant Representation **[RR-203]** Natural England has confirmed this: *"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."* In addition within Table 2 of the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14]** [REP1-025] states that they are content with the approach to the avoidance of harm through the implementation of offsets from sensitive habitats including trees,

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			hedgerows and ancient woodland. Therefore, in combination with the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.3]**, this is sufficient to protect ancient woodland. 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.
2.1.44	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 2)	Comment noting that the Proposed Development jeopardises the BOA aims to extend and link priority habitats which is contrary to local policy.	The Applicant does not accept that the Proposed Development jeopardises the overall aims of the Biodiversity Opportunity Area. Please see the Applicant's response to **Ref. 3.1.42** above regarding proposed habitat creation and enhancement measures that align with the aims of the Bernwood Biodiversity Opportunity Area. Additionally, Tables 1-6 and 1-8 of **Appendix 4** (**Policy Compliance Assessment Tables**) and Section 9 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** provide assessment of the Proposed Development against local planning policy. These assessments do not conclude any non-compliance with the relevant local planning policies.
2.1.45	CSAG (Pages 6 and 7, Paras. 24, 25 and 27 and Figure 1.)	Comment noting that the land within the Order Limits is subject to greater environmental constraints than any other area within the chosen radius and the constraints include SSSI, LWS, Ancient Woodland and the vulnerable Bechstein's bats. Further comment noting that Ancient Woodlands are rare in the wider landscape and that selecting an alternate site could have reduced ecological impacts.	The Applicant is fully aware of the importance of these areas of woodland that are located adjacent and within close proximity of the Proposed Development which are designated as SSSI, LWS and ancient woodland and the importance of these woodlands to Bechstein's bats as detailed within the assessment presented of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. The layout of the Proposed Development and embedded design principles have been designed to ensure the retention of these sites, ensure connectivity is maintained across the Site and linked to the wider landscape and that habitat suitable to support foraging, commuting and roosting bats including Bechstein's bats is maintained and enhanced as detailed within and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4**. As set out in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**), ecology and biodiversity considerations formed part of the wider environmental and planning constraints which influenced the selection of the site, alongside a number of other site selection criteria within NPS EN-3 (2023).
2.1.46	CSAG (Page 7, Para. 26)	Comment that the Order Limits includes land identified as a Local Nature Recovery Strategy Area, the aims of which are incompatible with the Proposed Development.	Mitigation planting for the Proposed Development, detailed and secured by the **Outline LEMP [EN010158/APP/7.6.3],** includes for 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) which is to restore nature by creating a network of bigger, better and more resilient habitats. This includes the following: • *M122: Take action to restore populations of blackthorn butterflies and moths* – 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 mainly (hedgerows and individual trees) or all (ancient woodland) retained. New hedgerow planting and new scrub planting is proposed, including hedgerows

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			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. • *M120: Take action to restore populations of the Duke of Burgundy butterfly* - 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 (glades and open areas within ancient woodland) is fully retained and appropriate buffers implemented. • *M110: Take action in Target areas for Species Recovery. This includes Bechstein's bat as well as other bat species* – 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. • *M1: Buffer and connect ancient woodlands, while preserving and enhancing other Priority Habitats such as chalk grassland, floodplain meadows* - No areas of chalk grassland or floodplain meadows have been recorded within or adjacent to the Order Limits. • 30m buffers with an additional 5m from solar panels to the security fence are proposed from all ancient woodland and minimum 10m buffer, with an additional 5m from solar panels to the security fence from all hedgerows, 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. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** recognises the importance of considering LNRS' and therefore provides assessment of the Proposed Development against Paragraph 5.4.34 of NPS EN-1 (2023) through **Appendix 4 (Policy Compliance Assessment Tables)**. As mentioned above, and in **Appendix 4** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**, the Applicant considers that Goal 1 and the key measures within the Buckinghamshire and Milton Keynes LNRS are supported by the design of the Proposed Development.
2.1.47	CSAG (Page 60, Row 1 and Page 78, Row 3 and Page 84, Para. 1)	Comment noting that the Applicant's assessment approach downplays and fails to assess the significance of the emerging Bernwood SSSI designation, despite its active progression by Natural England. Further comment noting that the Applicant has not adopted an avoidance-first approach consistent with the mitigation hierarchy and has removed some but not all panels in an area Natural England consider sensitive.	The Applicant has engaged pro-actively with Natural England throughout the consultation periods of the Proposed Development regarding the proposed Bernwood SSSI designation. Limited information on the proposed Bernwood SSSI designation is publicly available and the date for designation is not yet known. Natural England has confirmed that regarding the proposed Bernwood SSSI, the information that is publicly available is the only information it is able to share with the Applicant, therefore the Applicant does not know specifically which areas of land are proposed for inclusion within the designation or when or whether the designation will be implemented.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Further comment requesting that Natural England ought to clarify which land is under consideration and whether designation remains intended.	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: *"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."*
2.1.48	CSAG (Page 64, Row 3, Page 78, Row 3)	Comment noting that the Applicant's decision to disregard land clearly identifiable as likely to fall within the proposed Bernwood SSSI has resulted in an unjustifiably reduced weighting being applied to habitats that Natural England are actively considering for national-level designation. They consider that this creates a fundamental flaw in the Environmental Statement. Further comment noting that the Applicant's reliance on Bechstein's bats as a proxy for the proposed SSSI's importance is inadequate given the incomplete survey data and the fact that other qualifying interests for the emerging designation are not accounted for (e.g., SSSI landtake carries distinct policy weight too).	As outlined above Natural England has confirmed that regarding the proposed Bernwood SSSI, the information that is publicly available is the only information it is able to share with the Applicant, therefore the Applicant does not know specifically which areas of land are proposed for inclusion within the designation or when or whether the designation will be implemented. 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: *"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."* The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location.
Effects on Ancient Woodland, Veteran Trees and Hedgerows			
2.1.49	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment opposing the siting and scale of the Proposed Development due to location which is adjacent to multiple ancient woodlands.	As stated above under ***Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features*** section above**,** and 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],** all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development 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: *"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."* In addition, within Table 2 of the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]** states that they are content with the approach to the avoidance of harm through the implementation of offsets from sensitive habitats including trees, hedgerows and

			ancient woodland. Therefore, in combination with the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.3]** this is sufficient to protect ancient woodland. 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. The size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] sets out the reasoning for the Proposed Development, including its size and location. Furthermore, and as detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), the location and design of the Proposed Development is the result of a comprehensive site selection process that was environmentally, technically and planning-led to avoid and minimise the potential impacts of the Proposed Development. As set out in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]), ecology and biodiversity considerations formed part of the wider environmental and planning constraints which influenced the selection of the site, alongside a number of other site selection criteria within NPS EN-3 (2023).
2.1.50	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment that the Applicant's proposed 30m buffer to designated woodland should be extended to 50m minimum, noting that a large buffer may be required where more disturbance could be significant and to protect the habitat.	As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] (see RR-026 page 37) , the embedded mitigation detailed in Table 7.6 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and secured by **Outline LEMP [EN010158/APP/7.6.3]** includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development 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: *"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."* In addition, within Table 2 of the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14]** [REP1-025] states that they are content with the approach to the avoidance of harm through the implementation of offsets from sensitive habitats including trees, hedgerows and ancient woodland. Therefore, in combination with the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.3]** this is sufficient to protect ancient woodland. The **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] recognises, through Paragraphs 9.16.52 to 9.16.59, 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'.
Biodiversity Net Gain Assessment and how Biodiversity Net Gain would be Secured			
2.1.51	Berkshire, Buckinghamshire and Oxfordshire	Comment expressing concerns over unreliable baselines (timing, adequacy, and transparency), classification inconsistencies such as "other neutral grassland" versus "legume rich modified grassland" which materially change unit calculations, and	The Applicant has responded with regards to the age of survey data above under - ***Adequacy of the Assessments and Survey.***

	Wildlife Trust (Page 1)	uncertain delivery. Further comment that habitat specific management and condition targets must be defined now, not deferred to a future detailed LEMP.		The **Outline LEMP [EN010158/APP/7.6.3]** has been updated at Deadline 1 so that the proposed creation grassland terminology is now consistent with the proposed grassland habitat creation description detailed within **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]**, which refers to the proposed creation of other neutral grassland that will contain a high proportion of legume species. The **Outline LEMP [EN010158/APP/7.6.3]** provides sufficient detail at this stage of habitat management and condition targets to give confidence that the proposed habitat types to be created and enhanced are achievable and management prescriptions are appropriate.
2.1.52	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment objecting to the sale of “excess” on site BNG units.		The Applicant has not stated in any documentation that any biodiversity units delivered above the mandatory minimum requirement will be sold and that none of the proposed biodiversity units that would be delivered would be sold.
2.1.53	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment noting no firm commitment that created habitats will be managed after decommissioning, and this uncertainty weakens credibility of claimed net gains and mitigation.		Current Government Policy with regards Biodiversity Net Gain only requires habitats to be managed for a period of 30 years and the Applicant will have no control of the land following decommissioning. Habitats created on-site would be managed for the operational (including maintenance) phase of the Proposed Development, with the assumption being that habitats (excluding new tree and hedge planting) would be returned to agricultural use at the end of the operation (including maintenance) phase. Impacts arising from decommissioning would be assessed at the decommissioning stage in line with the **Outline DEMP [EN010158/APP/7.4.3]** and this would include the potential loss of any gain in biodiversity which has occurred over the lifespan of the Proposed Development.
2.1.54	CSAG (Page 71 and 72, Row 2 and Page 85, Para. 2)	Comment that the proposed creation of species-rich grassland will likely result in a more mundane form of agricultural grassland due to: • Being on arable land with latent high soil fertility which will militate against the successful creation of species-rich grassland; • Substantial areas will be shaded due in part to topography and panel shading; and • No certainty being provided by the Applicant securing that existing grazing levels will be maintained, undermining claims of increased invertebrate biomass benefiting ‘birds and bats’.		The Applicant has been pragmatic about the diversity of grassland that could be established and been modest in the assumptions regards what final habitat condition would be achieved and is suggesting other neutral grassland with a moderate diversity of species and not lowland meadow. Many of the margins have already been grassed down and support a moderate diversity of wild plant species including bird’s foot trefoil and knapweed and what the Applicant is proposing to create in areas without panels is broadly similar giving confidence in what can be created. being pragmatic about what can be created. Detailed soil nutrient levels will be carried out construction and the **Outline LEMP [EN010158/APP/7.6.3]** makes provision for nutrient reduction should this be required, but that does not involve topsoil striping. With regards fields supporting panels overall the Applicant has assumed poor condition for final habitats taking account of limitation posed by panels such as shading**.** Please refer to **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** for further details. The Applicant is committed to using grazing management if possible but cannot commit to maintaining current levels of intensive grazing. Grazing levels during the operation (including maintenance) phase will be defined in the final LEMP but are likely to be lower than current to ensure the required grassland condition and wildlife benefits are delivered.
2.1.55	ECO**, EIA**	CSAG (Page 72, Row 2 and Page 79, Row 2)	Comment noting that the Applicant’s BNG assessment is undermined by classification errors, unsupported assumptions about species-rich	The reason the BNG metric has not been submitted is that the Planning Inspectorate’s (PINS) website does not allow for the uploading of an Excel Spreadsheet, not that the Applicant was unwilling to make this information available. A copy of the excel spreadsheet has been made available to the Local Planning Authority, and the Applicant would be pleased to provide a copy to

grassland delivery, and the absence of a transparent BNG Metric. Further comment that the excel version of the metric has not been provided to allow for proper examination.	the Action Group at Deadline 2. It should be noted that copies of the spreadsheet tabs were provided to PINS. As outlined above the Applicant has been pragmatic with regards its habitat creation assumptions and any assumptions regards habitat classification are outlined in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]**.

Table 2-2: Biodiversity and Ecology (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Adequacy of the Assessments and Surveys	
2.2.1	Hogshaw Farm & Wildlife Park LTD (Battery Energy Storage Systems, Page 6)	Comment requesting further clarity on survey coverage and seasonal ecological use, given the proximity of BESS to fields which regularly host wintering flocks of lapwing which have experienced significant national declines.	Further clarification on survey coverage and the seasonal use of areas by lapwing is given within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** Table 7.2, which details the survey area for wintering birds. Areas subject to breeding and wintering bird survey have been clearly articulated within the winter bird reports **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4] [APP-089]** and **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4.2] [REP1-058]** however due to information concerning the location of nesting raptor species protected under Schedule 1 of the Wildlife and Countryside Act there are some confidential records within these reports, these are not publicly available. The national decline in lapwing is a decline in the breeding population due to agricultural intensification and a change in agricultural practices. The majority of wintering lapwing are from the continent and any declines in wintering numbers are due to climate change with warmer weather on the continent reducing the need for birds to migrate to the UK to avoid cold continental weather. As outlined above, no significant impacts on wintering lapwing are envisaged.
2.2.2	Hogshaw Farm & Wildlife Park LTD (Biodiversity Net Gain and Mitigation, Page 8)	Comment noting the concerns raised by local ecological organisations and how the land can be considered appropriate for the Proposed Development or how the site-selection and assessment process can be said to have given sufficient weight to biodiversity and ecology.	The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location. Furthermore, and as detailed in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**), the location and design of the Proposed Development is the result of a comprehensive site selection process that took into account environmental, planning and technical consideration' to avoid and minimise the potential impacts of the Proposed Development. As set out in the **Site Selection Report** (**Appendix 1** to the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**), ecology and biodiversity considerations formed part of the wider environmental and planning constraints which influenced the selection of the site, alongside a number of other site selection criteria within NPS EN-3 (2023).
		Effects on Species and Habitats	
2.2.3	Hogshaw Farm & Wildlife Park LTD (Biodiversity and Conservation Identity, Page 7)	Comment noting the Applicant proposes biodiversity mitigation, but that it doesn't remove the concern over the wider landscape becoming fragmented which would have consequences for habitat connectivity.	Comment is noted but the mitigation outlined in the **Outline LEMP [EN010158/APP/7.6.3]** is specifically designed to reduce fragmentation and maintain connectivity with the wider landscape.
2.2.4	Hogshaw Farm & Wildlife Park LTD (Biodiversity and Conservation Identity, Page 8)	Comment noting ecological importance of the landscape, and that this has been raised by others such as the North Bucks Bat Group who are concerned about the impact on Bechstein's bat population.	The Applicant is fully aware of the importance of the landscape to Bechstein's bats as detailed within the assessment presented of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. The layout of the Proposed Development and embedded design principles have been designed to ensure the retention of these sites, ensure connectivity is maintained across the Site and linked to the wider landscape and that habitat suitable to support foraging, commuting and roosting bats including Bechstein's bats is maintained and enhanced as detailed within and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			[EN010158/APP/7.6.3], **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**.
2.2.5	Grendon Underwood Parish Council (Page 2) and Edgcott Parish Council (Page 2)	Comment noting that the Proposed Development would cause disruption to wildlife. Further comment noting the loss and dispersal of wildlife.	Comment is noted. It is not envisaged that there will be significant loss or dispersal of wildlife due to the mitigation measures incorporated into the design of the Proposed Development, see **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** for the full assessment of impacts on wildlife.
2.2.6	Twyford Parish Council	Comment noting the stress the land is already under as a result of HS2 and East West rail, noting this has implications for biodiversity connectivity. Further comment noting the fencing affecting connectivity.	**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 HS2 and East West rail in combination with the Proposed Development. Where the assessment has highlighted that there is the potential for cumulative effects, this has been flagged. It is acknowledged that there has been significant construction activity and disruption caused by large numbers of contractors, vehicles and plant movement as well as unprecedented habitat change due to HS2 for several years. With respect to bats (which have been extensively monitored), from the surveys undertaken to date, it does not appear that the construction phase of HS2 has resulted in a significant negative impact on bat activity. With regard to permeability, this area includes five 30-metre green bridges to mitigate for the barrier effect on wildlife and maintain connectivity. As detailed within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]** [REP1-034], the fields housing the Solar PV modules and supporting infrastructure would be defined using deer-proof fencing which is formed of wooden and/or metal posts and wire mesh. Deer-proof fencing would run around fields housing the Solar PV modules and would allow for gaps and corridors between fields, thereby retaining permeability for wildlife. It is proposed that mammal gates are included within the deer-proof fencing to allow other wildlife to move across the Site. Security fencing will not be dug into the ground, allowing species such as badgers to push under the fence to forage as required as detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, Table 7.5.
		Effects on Ancient Woodland, Veteran Trees and Hedgerows	
2.2.7	Grendon Underwood Parish Council (Page 2) and Edgcott Parish Council (Page 2)	Comment noting the presence of ancient woodland and SSSIs within or near the Proposed Development and Order Limits, and that harm would be contrary to the Wildlife and Countryside Act 1981.	As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] (see RR-026 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]** all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development 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: *"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."* In addition, within Table 2 of the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14]** [REP1-025] states that they are content with the approach to the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			avoidance of harm through the implementation of offsets from sensitive habitats including trees, hedgerows and ancient woodland. Therefore, in combination with the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.3]** this is sufficient to protect ancient woodland. 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.
Biodiversity Net Gain Assessment and how Biodiversity Net Gain would be Secured			
2.2.8	Hogshaw Farm & Wildlife Park LTD (Biodiversity Net Gain and Mitigation, Page 8)	Comment noting concern that the Applicant's biodiversity mitigation and net gain case depends on assumptions about habitat creation, condition, and long-term management that aren't yet clearly demonstrated in practice. Further comment that they consider the genuine ecological value of the proposed mitigation and enhancement measures require careful scrutiny.	Firstly, the Biodiversity Net Gain process does require making some assumptions with regards habitat creation, condition and long-term management but that these assumptions are built into the statutory metric and the development of the BNG process has been subject to Government scrutiny. The Applicant has been pragmatic about the diversity of grassland that could be established and been modest in the assumptions regards what final habitat condition would be achieved and is suggesting other neutral grassland with a moderate diversity of species and not lowland meadow. Many of the margins have already been grassed down and support a moderate diversity of wild plant species including birds foot trefoil and knapweed and what the Applicant is proposing to create in areas without panels is broadly similar giving confidence in what can be created. Detailed soil nutrient levels will be carried out construction and the **Outline LEMP [EN010158/APP/7.6.3]** makes provision for nutrient reduction should this be required that does not involve topsoil striping**.** With regards fields supporting panels overall the Applicant has assumed poor condition for final habitats taking account of limitation posed by panels such as shading see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** which fully recognises the existing ecological baseline of proposed habitat creation and enhancement and the proposed post development scenario.
2.2.9	Grendon Underwood Parish Council (Page 2)	Comment noting that the Proposed Development would result in low or no BNG, and it is likely any BNG would not meet the minimum thresholds of local and national policy requirements.	The Applicant disagrees with Grendon Underwood Parish Council's position on the BNG achievable by the Proposed Development. 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 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 Development Consent Order (DCO) [EN010158/APP/3.1.4]** secures, via Requirement 7, a BNG that is significantly in excess of 10% and equates to a secured minimum net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units. Furthermore, it should be noted that BNG is not yet mandatory for NSIP-scale projects and so BNG should be received positively and attract

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			weight, particularly where the uplift is as great as it is in the Proposed Development's case. This is fully in line with local and national policy thresholds.
2.2.10	Edgcott Parish Council (Page 2)	Comment noting that BNG is impossible to envisage in the short to medium term especially.	Comment noted but the Applicant fails to see why BNG is not possible to envisage. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2]** [REP1-060] has been carried out in line with national and local policy and as outlined above the Applicant has been pragmatic with regards its BNG assumptions.

Table 2-3: Biodiversity and Ecology (Other Interested Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Adequacy of the Assessments and Surveys	
2.3.1	REP1-159	**Adequacy of surveys** Comment that no real data has been used to inform the baseline for assessing ecological impacts within cable corridors.	This comment is not factually correct; the cable route works will be short term and temporary and as such do not warrant the same level of survey work to inform the assessment of the potential impacts as has been carried out elsewhere. However, the route has been subject to a Preliminary Ecological Appraisal at **ES Volume 4, Appendix 7.7 [EN010158/APP/6.4] [APP-093]** so the Applicant does understand the likely impacts of the proposed works. The **Outline CEMP [EN010158/APP/7.2.3]** and **Outline LEMP [EN010158/APP/7.6.3]** outlines mitigation measures to safeguard ecological receptors during the cable route construction process.
2.3.2	REP1-159	**Adequacy of surveys** Comment that limited data supports the assessment of ecological impacts for Parcel 3.	As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, surveys for wintering birds were undertaken between October 2021 and March 2022, and between November 2023 and March 2024. No survey work was undertaken in Parcel 3 during 2023-2024 as access could not be obtained. However, the Applicant had data for Parcel 3 from 2021-2022 and from adjacent fields in 2023-2024. This, combined with the fact that arable and improved grassland present in Parcel 3 (as detailed within **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093]**) is well represented elsewhere on-site means the Applicant has sufficient data on which to base its assessment. The assessment of potential impacts on wintering birds is set out in the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. The Applicant is fully aware that Claydon Brook and its tributaries provide important wildlife corridors, this is reflected within the mitigation proposed within Parcel 3, where perimeter fencing surrounding the Solar PV development will be offset at least 10m from the top of bank of Claydon Brook, extended to 20m in Fields E20, E11, E10 and north section of E21. This will retain vegetation connectivity, help to stabilise banks and help provide protection from pollution such as runoff. It will also maintain the vegetated watercourse corridor habitat for aquatic species, riparian mammals and foraging and commuting bats detailed within and secured by the **Outline LEMP [EN010158/APP/7.6.3]**.
2.3.3	REP1-159	**Adequacy of surveys** Comment that baseline population assessments need to be informed by an understanding of species density across the whole of the Order limits.	As previously stated within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, the habitats present within the Cable Corridors are similar to the habitats present within the Parcels where other infrastructure is proposed to be sited, therefore the Applicant is confident that works undertaken within the Cable Corridor route will be short term and temporary, with mitigation detailed within **Outline CEMP [EN010158/APP/7.2.3]** considered more than sufficient to mitigate any potential impacts that may occur during this short duration of works. The Cable Corridor route areas will be returned to current use following completion of works and therefore the areas of land will be once again able to be used by these species as is currently used. The Applicant has fully acknowledged the importance of the Site for wintering bird species assemblage and has mitigated accordingly, as detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]].**
2.3.4	REP1-159	**Adequacy of surveys** Request that the Applicant should be required to conduct ecological surveys in those areas of the Order Limits for which no data has been obtained, particularly to inform	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has fully considered impacts on ground nesting birds and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] considers cumulative effects.**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		assessment of impacts on skylarks and cumulative effects from the Statera BESS site and the replacement National Grid substation.	
2.3.5	REP1-263	**Adequacy of surveys** Comment that the submitted ecological surveys appear incomplete or insufficiently robust.	As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, the Applicant considers the ecological survey effort is adequate to inform a complete and detailed assessment that fully considers impacts the ecological receptors as provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**.
2.3.6	REP1-199	**Adequacy of assessments** Comment that health impacts have only been assessed for human receptors and environmental effects on wildlife and farmstock have not been included. Specific topics include noise, air quality, safety and pollution.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** fully assesses the potential effects that could arise from the Proposed Development on ecological receptors, with embedded mitigation and additional mitigation measures detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** proposed to address the impacts of the Proposed Development. Intra cumulative effects which assessed combined effects on receptors from various factors are presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].**
2.3.7	REP1-192	**Approach to assessment** Comment that the assessment of biodiversity severely underestimates impacts of Proposed Development.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** takes into account the multiple factors that could arise as a result of the Proposed Development and a complete and detailed assessment based on a worst case scenario that fully considers impacts the ecological receptors and appropriate mitigation is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**.
		Effects on Species and Habitats	
2.3.8	REP1-184, REP1-188	**Amphibians** Comment that the Proposed Development would have a negative impact on amphibians.	The full assessment for legally protected and notable species including amphibians, badgers and bats is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and, where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.
2.3.9	REP1-188, REP1-189, REP1-225, REP1-246	**Badger** Comment that the Proposed Development would have a negative impact on badger.	Please see above response to **Ref. 2.3.8**.
2.3.10	REP1-136, REP1-146, REP1-164, REP1-172, REP1-188, REP1-189, REP1-199, REP1-209, REP1-214, REP1-217, REP1-234, REP1-250, REP1-252, REP1-274, REP1-287, REP1-263	**Bats** Comment that the Proposed Development would have a negative impact on bats. Specific references made to Bechstein's bat.	Please see above response to **Ref. 2.3.8**.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
2.3.11	REP1-159	**Bats** Comment that the Applicant has not appropriately considered the importance of grazed, open field areas to bat species.	The Applicant acknowledges Fields B6, B7 and B8 are grazed open fields and have a strategic location between Shrubs Wood, Decoypond Wood and Sheephouse Wood and 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].** The design of the Proposed Development takes into account the foraging behaviour of bats, in particular Bechstein's bats, with approximately 93ha of grassland to 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 **Outline LEMP [EN010158/APP/7.6.3].** It is proposed that mitigation areas be cattle grazed to ensure no net loss of cattle grazed grassland habitat which will have plant diversity enhanced, so the importance of open foraging habitat is fully recognised.
2.3.12	REP1-159	**Bats** Request that the Applicant confirm why it has retained solar panels in Fields D28 and D29 when it removed similar fields due to potential impacts on Bechstein's bats.	Perimeter fencing surrounding the Solar PV development would be offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and partially in Field D28 with an additional 5m from Solar PV development 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 D30-D37) 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]**.
2.3.13	REP1-146, REP1-156, REP1-164, REP1-172, REP1-188, REP1-189, REP1-199, REP1-209, REP1-214, REP1-217, REP1-220, REP1-225, REP1-228, REP1-231. REP1-234, REP1-246, REP1-250, REP1-252, REP1-274, REP1-278, REP1-282, REP1-287, REP1-263	**Birds** Comment that the Proposed Development would have a negative impact on birds. Specific references made to yellow wagtail, kingfisher, swallows, plovers, red kite, swift, bullfinches, buzzard, nightingales, snipe, curlew, bitterns, merlins, cuckoos, sparrow hawks, raptors, owls and skylarks.	The Applicant disagrees with this statement. An assessment of the potential impacts on bird species is given within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and a suite of mitigation measures presented in the **Outline LEMP [EN010158/APP/7.6.3]** to minimise residual impacts.
2.3.14	REP1-231	**Birds** Comment that discussion of curlew in the Application is absent, despite wildlife groups and farmers starting to reintroduce curlew into the local area near the River Ray and Upper Ray Meadows and these conservation efforts would be negatively impacted by the Proposed Development.	Curlew have not been considered within the assessment as desk study and survey work has not indicated they are present as reflected by proposals to reintroduce them to the wider area. The River Ray and associated meadows are some distance (5-10km) from the Proposed Development and therefore it is not considered that the Proposed Development will significantly constrain the ambition to reintroduce them. The long-term declines in curlew numbers nationally are related to changes in agricultural practice and increased predation from both mammal and avian predators such as corvid are not related to solar development.
2.3.15	REP1-159	**Birds** Comment that it is not possible to be certain about the adequacy of the Applicant's approach to replacement skylark territories because it has not provided data for the whole of the Order limits.	It is correct that only Solar PV development areas have been subject to breeding bird survey but 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 survey over two years and as the Cable Corridor route and other areas support

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			identical habitat to areas that have been subject to breeding bird surveys, meaning that we can predict the likely usage of these areas by breeding 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. 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 regards nesting birds. Finally, As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see RR-020 page 288), outlines the suite of mitigation measures designed to benefit ground nesting birds. These measures would be secured by the **Outline LEMP [EN010158/APP/7.6.3]** along with a monitoring programme.
2.3.16	REP1-220	**Birds** Comment that current land management regimes have led to an increase in wintering bird populations.	Current UK wide agricultural practices have led to a significant decline in farmland bird populations some of which is reflected in reduced wintering numbers as well as a reduction in European birds overwintering due to warmer winters on the continent. At Site, slightly more wintering birds were recorded in the 2024 surveys compared to the earlier 2022 survey work and this could reflect local agricultural practice such as retention of winter stubbles and other sources of winter seed, helping to boost numbers, but numbers are still low compared to more arable dominated areas within the east of England. The suite of mitigation measures secured by the **Outline LEMP [EN010158/APP/7.6.3]** is designed to ensure foraging opportunities for wintering birds remain.
2.3.17	REP1-172, REP1-196. REP1-217, REP1-225, REP1-263	**Birds** Comment that ground-nesting birds like skylarks are vulnerable to disturbance and reductions in foraging habitat.	The Applicant agrees as detailed within the assessment for ground nesting birds (including skylarks) presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and a suite of mitigation measures for skylark and other ground nesting birds is secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**.
2.3.18	REP1-177, REP1-188, REP1-189, REP1-209, REP1-220, REP1-225, REP1-228, REP1-234, REP1-246, REP1-274	**Deer** Comment that the Proposed Development would have a negative impact on deer.	Deer will experience a slight loss in foraging habitat due to the fencing of panel areas but with no natural predators, deer populations in the UK are extremely high such that the UK government is considering relaxing rules to allow more effective culling to bring the population down to a more sustainable level and as such they are not a nature conservation priority. In general, deer use woodland habitat during the day, emerging at dusk and dawn to forage. All woodland has been retained, in addition wide buffers adjacent to hedgerows and woodland will allow deer to continue to move across the wider landscape through these buffers, secured by the **Outline LEMP [EN010158/APP/7.6.3]**. Therefore, no significant impacts on the deer population are anticipated.
2.3.19	REP1-263	**Dormice** Comment that the Proposed Development would have a negative impact on dormice.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** no records of hazel dormouse have been identified within 2km of the Order Limits, and there are limited records of their presence in Buckinghamshire. Therefore, hazel dormouse has not been considered within the assessment.
2.3.20	REP1-209, REP1-225, REP1-232, REP1-241, REP1-246, REP1-247, REP1-250, REP1-253, REP1-259, REP1-284,	**Fencing** Comment that wildlife movement will be affected by fencing and CCTV.	As detailed within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]**, the fields housing the Solar PV modules and supporting infrastructure would be defined using deer-proof fencing which is formed of wooden and/or metal posts and wire mesh. Deer-proof fencing would run around fields housing the Solar PV modules

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
	REP1-246, REP1-263, REP1-271, REP1-275, REP1-294		and would allow for gaps and corridors between fields, thereby retaining permeability for wildlife. It is proposed that mammal gates are included within the deer-proof fencing to allow other wildlife to move across the Site. Security fencing will not be dug into the ground, allowing species such as badgers to push under the fence to forage as required as detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, Table 7.5. There would be no permanent (continuous) lighting for security purposes except for at emergency exits relating to Work Nos. 2-5 (see the **Works Plans [EN010158/APP/2.3.3]** [**REP1-005**]). Security lighting would use infra-red sensors which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.4]**, and the **Outline CEMP [EN010158/APP/7.2.3]**. The CCTV is also based on infra-red and therefore Solar PV development would not be continuously lit by visible lighting and wildlife will not be able to see it. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting as set out and secured with the **Outline CEMP [EN010158/APP/7.2.3].**
2.3.21	REP1-146, REP1-172, REP1-217, REP1-225, REP1-263	**Flight paths** Comment that the Proposed Development would affect flight paths of insects, bats and birds.	A detailed assessment with regards to flight paths has been given within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and there has been consideration that foraging bats may be displaced due to the presence of Solar PV development but the design of the Proposed Development and the wide buffers protecting key flightlines such as woodland edges and hedgerows has been designed to minimise this effect and ensure bats can still move and forage across the landscape. The **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [**PDA-006**] **RR-020 page 290**, discusses the potential for birds, bats and insects to collide with Solar PV modules and no evidence to suggest a significant effect has been identified.
2.3.22	REP1-189, REP1-225, REP1-246, REP1-274	**Fox** Comment that the Proposed Development would have a negative impact on fox.	As detailed within **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]** [**REP1-034**], the fields housing the Solar PV modules and supporting infrastructure would be defined using deer-proof fencing which is formed of wooden and/or metal posts and wire mesh. Deer-proof fencing would run around fields housing the Solar PV modules and would allow for gaps and corridors between fields, thereby retaining permeability for wildlife. It is proposed that mammal gates are included within the deer-proof fencing to allow other wildlife to move across the Site. Security fencing will not be dug into the ground, allowing species such as foxes to push under the fence to forage as required as detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**, Table 7.5.
2.3.23	REP1-120, REP1-136, REP1-137, REP1-146, REP1-156, REP1-164, REP1-166, REP1-177, REP1-184, REP1-186, REP1-188, REP1-189, REP1-197, REP1-198, REP1-201, REP1-202, REP1-209, REP1-214, REP1-217, REP1-225, REP1-228, REP1-234, REP1-	**General comment** Comment that the Proposed Development would have a negative impact on local wildlife.	The full assessment for legally protected and notable species is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and, where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
	238, REP1-244, REP1-246, REP1-248, REP1-249, REP1-250, REP1-252, REP1-267, REP1-268, REP1-273, REP1-274, REP1-278, REP1-282, REP1-283, REP1-287, REP1-291, REP1-246, REP1-300		
2.3.24	REP1-188, REP1-197, REP1-208, REP1-209, REP1-228	**General comment** Comment that the construction phase of the Proposed Development would have a negative impact on local wildlife.	The full assessment for legally protected and notable species during the construction phase of the Proposed Development is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and no significant effects were identified. Where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3]** and **Outline LEMP [EN010158/APP/7.6.3]**. The mitigation measures proposed to address the impacts of the Proposed Development are robust and sufficient.
2.3.25	REP1-177, REP1-250, REP1-287	**Great Crested Newts** Comment that the Proposed Development would have a negative impact on great crested newts.	The full assessment regarding Great Crested Newt (GCN) is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. Where required, mitigation measures are detailed and secured by **Outline CEMP [EN010158/APP/7.2.3]**, **Outline LEMP [EN010158/APP/7.6.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** which are robust and sufficient to offset the impacts of the Proposed Development. The assessment outlines that the Proposed Development would either make use of either the local District Level GCN licence or Natural England licence option – the licence being the derogation that allows the Proposed Development to proceed. Note, within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see RR-203 page 216)**,** that Natural England's Wildlife Licensing team have engaged with the Applicant to discuss potential impacts to Great Crested Newts and agreed the survey approach, the mitigation approach and the compensation approaches in principle.
2.3.26	REP1-155, REP1-164, REP1-168, REP1-173, REP1-178, REP1-179, REP1-181, REP1-184, REP1-193, REP1-196, REP1-209, REP1-212, REP1-214, REP1-217, REP1-220, REP1-223, REP1-225, REP1-234, REP1-237, REP1-246, REP1-247, REP1-253, REP1-256, REP1-275, REP1-293	**Habitat** Comment that the Proposed Development would lead to a loss of wildlife habitat.	Comment noted. The full assessment regarding habitat loss is outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].** Appropriate mitigation measures are detailed and secured by **Outline CEMP [EN010158/APP/7.2.3]**. The design of the Proposed Development has deliberately been planned to ensure the retention of habitats of most value to wildlife (woodland, hedgerows, ponds, watercourses, field margins). The habitat creation and enhancement measures outlined and secured in the **Outline LEMP [EN010158/APP/7.6.3]** would benefit a wide range of species present.
2.3.27	REP1-196, REP1-225, REP1-254	**Habitat** Comment that the Proposed Development would fragment existing wildlife habitats.	Comment is noted and the Applicant has outlined a suite of mitigation measures to address impacts on landscape connectivity for wildlife. A response has previously been provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see RR-026 page 29), with mitigation measures secured within the **Outline LEMP [EN010158/APP/7.6.3].** The locations of mitigation areas have been chosen to ensure connectivity within the Site would

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			be enhanced to create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.
2.3.28	REP1-177, REP1-234, REP1-246	**Hare** Comment that the Proposed Development would have a negative impact on hares.	The **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has not identified any significant effect on hares. Fencing would be on the inside of each field with sizeable buffers from hedgerows and woodland which would enable wildlife such as hares to move between fields across the wider landscape. In addition, fencing would not be buried so hares would be able to push underneath the fencing at low points to access fields to forage. The mitigation proposed to address the impacts of the Proposed Development on hares is robust and sufficient to address the issue of potential displacement and ensure connectivity, enabling species to move across the landscape. In addition, based on experience of solar farms in the Bristol vale, it is apparent that hares do push under the fence, often adjacent to carefully sited gates.
2.3.29	REP1-156, REP1-263	**Hedgehog** Comment that the Proposed Development would have a negative impact on hedgehog.	The full assessment for legally protected and notable species including hedgehogs is provided within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and, where required, mitigation measures are detailed and secured by the **Outline CEMP [EN010158/APP/7.2.3].** However, retention of all woodland habitat and the majority of hedgerows along with substantial buffers maintained as a mosaic of long grass and scrub together with other habitat creation and enhancement measures are likely to benefit hedgehogs in the long term.
2.3.30	REP1-199, REP1-234, REP1-246, REP1-287, REP1-271	**Insects** Comment that the Proposed Development would have a negative impact on insects. Specific reference made to dragonflies.	The Solar PV modules would be bifacial with an anti-reflective coating, to reduce light polarisation impacts and thereby reduce the impact on invertebrate species, detailed within and secured by the **Design Commitments [EN010158/APP/5.9.4]**. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has not identified any significant effects on invertebrate species, taking into account available literature. Please refer to **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see RR-026 page 33) for further detail on this point.
2.3.31	REP1-146	**Lake effect** Comment that there would be a collision risk for birds and bats because of the solar PV.	The risk of the lake effect and other impacts concerned with light polarisation have been fully assessed within the ecological assessment presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] RR-020 page 290** The Proposed Developments Solar PV modules would be bifacial with an anti-reflective coating, to reduce light polarisation impacts and thereby reduce the impact on bats and birds, detailed within and secured by the **Design Commitments [EN010158/APP/5.9.4]**. Please refer to **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** for further detail.
2.3.32	REP1-246	**Lighting** Comment that lighting would negatively affect local wildlife.	There would be no permanent (continuous) lighting for security purposes except for at emergency exits relating to Work Nos. 2-5 (see the **Works Plans [EN010158/APP/2.3.3] [REP1-005]**). Security lighting would use infra-red which is not on the visible spectrum for wildlife. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.4]**, and the **Outline CEMP [EN010158/APP/7.2.3]**. The CCTV is based on infra-red and therefore Solar PV development would not be continuously lit by visible lighting. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			would be used to avoid constant lighting as detailed and secured within the **Outline CEMP [EN010158/APP/7.2.3].**
2.3.33	REP1-184, REP1-256	**Microbes** Comment that the solar farm would destroy microbes which would release Co2 and damage the soil condition.	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]** reversion of arable land to grassland is proposed. Converting arable land back to grassland is widely considered one of the most effective ways to improve soil health, especially on degraded or intensively farmed soils, in particular moderately species-rich grassland swards as is proposed for the Proposed Development. Creation of grassland and appropriate management as detailed within the **Outline LEMP [EN010158/APP/7.6.3]** would enhance microbial activity, improve soil structure and increase carbon sequestration in addition to supporting a wide variety of wildlife species including birds, bats, invertebrates.
2.3.34	REP1-145, REP1-172, REP1-225, REP1-234, REP1-252	**Mitigation** Comment that the proposed mitigation measures would be insufficient to overcome the negative effects on ecology from the Proposed Development.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and stated throughout **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, a full assessment has been undertaken for considering all potential impacts that could arise from the Proposed Development on ecological receptors and the proposed mitigation measures are robust and sufficient to offset the impacts of the Proposed Development.
2.3.35	REP-188	**Otters** Comment that there are otters in Padbury Brook and the lake at Middle Claydon and when recent activity at Middle Claydon displaced the otters they found their way into the village for safety.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see RR-049 page 321), a full assessment has been undertaken for otters and the proposed mitigation measures are robust and sufficient to offset the impacts of the Proposed Development on otter.
2.3.36	REP-164	**Plants** Comment that the Proposed Development would have a negative effect on plants.	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]** reversion of arable land to grassland is proposed. Converting arable land back to grassland is likely to benefit plant species, especially on degraded or intensively farmed soils, in particular moderately species-rich grassland swards as is proposed for the Proposed Development. Creation of grassland and appropriate management as detailed within the **Outline LEMP [EN010158/APP/7.6.3]** would enhance plant species diversity.
Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features			
2.3.37	REP1-120	Comment that the Proposed Development is too close to SSSIs.	In its Relevant Representation **[RR-203]** Natural England has confirmed this: *"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."* All woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			This embedded mitigation is 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].**
		Habitats Regulations Assessment Matters	
2.3.38	REP1-263	**Need for a HRA** Comment that a full Habitat Regulations Assessment should be required if the Site is functionally linked to any nearby protected sites and where significant harm cannot be ruled out, permission should be refused.	A Habitat Regulations Screening Assessment has been carried out (**Habitat Regulations Assessment: No Significant Effects Report [EN010158/APP/5.3] [APP-033]**) and submitted as part of the DCO Application which has concluded there are no European protected sites that would be adversely affected by the Proposed Development and no species for which could be considered functionally linked have been identified.
		Effects on Ancient Woodland, Veteran Trees and Hedgerows	
2.3.39	REP1-136, REP1-155, REP1-164, REP1-202, REP1-214, REP1-297	**Ancient trees and woodland** Comment that the Proposed Development would have a negative impact on ancient trees and woodland. Specific reference made to Runt's Wood.	Please see above response under **Ref. 2.3.37** - ***Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features.***
2.3.40	REP1-120	**Ancient trees and woodland** Comment that there is ancient woodland within and adjacent to the Order Limits.	Please see above response under **Ref. 2.3.37** - ***Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features.***
2.3.41	REP1-155, REP1-178, REP1-181, REP1-234, REP1-282	**Hedgerows** Comment that the Proposed Development would have a negative impact on hedgerows.	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. It is acknowledged that new hedgerow planting would take some time to fully establish (perhaps 10 years) but this certainly does not equate to permanent loss. Up to 2,060m of hedgerow is proposed to be lost, however approx. 4,170m of new and reinstated hedgerow planting 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. 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.
2.3.42	REP1-172 , REP1-181, REP1-207, REP1-220, REP1-225	**Hedgerows** Comment that loss of hedgerow would fragment wildlife habitats, as these serve as important interconnecting corridors for wildlife. Other comments note the long time it would take for new planting to establish.	Please see response in the above **Ref. 2.3.41**.
2.3.43	REP1-178	**Removal of vegetation** Comment that hedgerows and trees would need to be removed to facilitate the Proposed Development.	Please see response in the above **Ref. 2.3.41**.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
2.3.44	REP1-199	**Woodland** Comment that there would be a negative impact on woodland within Parcel 2 which are very species rich, with specific reference to birds, butterflies, plants and rare bats.	Please see above response under **Ref. 2.3.37** - ***Effects on Statutory Designated and Non-Designated Sites, Sites of Nature Conservation and on any other Relevant Ecological Features.***
		Biodiversity Net Gain Assessment and how Biodiversity Net Gain would be Secured	
2.3.45	REP1-155	**Principle of BNG** Query how the Applicant will increase biodiversity, when the local area is one of the most biodiverse in the country according to Natural England.	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** has been carried out in line with national and local policy and is consistent with BNG assessments carried out for similar large scale solar schemes and the Applicant has been pragmatic with regards its BNG assumptions. Many of the baseline habitats have a relatively low biodiversity value and can be enhanced.
2.3.46	REP1-220	**Validity of BNG** Comment that the claimed BNG figure should be scrutinised.	Comment noted.
2.3.47	REP1-120, REP1-217, REP1-220, REP1-263	**Validity of BNG** Comment that there would not be a Biodiversity Net Gain and there would be a net loss of wildlife.	The Applicant disagrees with this statement. **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** has been carried out in line with national and local policy and is consistent with BNG assessments carried out for similar large scale solar schemes. The Applicant has been pragmatic with regards to the assumptions used to inform the BNG assessment. The full assessment with regards wildlife is detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].**
2.3.48	REP1-220	**Validity of BNG** Comment that the metrics employed to assess habitat value and BNG are fundamentally flawed when used for solar at this scale.	The Applicant disagrees with this statement. The **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** has been carried out in line with national and local policy and is consistent with BNG assessments carried out for similar large scale solar schemes and the Applicant has been pragmatic with regards its BNG assumptions.
		Other Matters	
2.3.49	REP1-220	**Shading** Comment that shading from solar PV would reduce plant's ability to produce nectar, seeds and sugars by 90%.	With regards fields supporting panels, overall the Applicant has assumed poor condition for final habitats taking account of limitation posed by Solar PV modules such as shading, see **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].** However, plants will grow underneath Solar PV modules and in particular between the rows and numerous studies indicate well managed solar farms will benefit pollinators and other invertebrates.
2.3.50	REP1-143, REP1-217, REP1-250, REP1-252, REP1-278	**Microclimate** Comment that the Proposed Development would increase the microclimate of the local area which would negatively affect biodiversity.	Solar PV modules do get hot when in direct sun, but do not have the thermal mass to retain heat after direct solar radiation stops and will quickly cool down. Based on the Applicant's experience of utility projects, the newer bifacial glass/glass panels block some, but not all the sunlight, unlike the older monofacial with a back sheet. This in turn creates a shaded, slightly cooler microclimate with less water evaporation where grass can thrive. The vegetation proposed underneath and

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			around the panels has been designed to incorporate a range of legume species of value to pollinators and other invertebrate species. It is proposed to graze extensively under Solar PV modules with sheep, to help maintain floristic diversity as well as the droppings which would further benefit some species of invertebrates. This coupled with the suite of mitigation measures outlined in **Outline LEMP [EN010158/APP/7.6.3]** has been specifically designed to benefit invertebrate species and bat prey.

Table 3-1: Cultural Heritage (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Cultural Heritage, including Designated and Non-Designated Heritage Assets	
3.1.1	CSAG (Heritage Critical Review, paragraph 3.0.1)	Comment noting that the Archaeological Desk-Based Assessment presents a broad overview of the Site's historic landscape and its environs. The assessment is primarily archaeological in focus, and it is considered that a more thorough assessment of the character of the historic environment would be appropriate.	The Applicant disagrees. **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** has been prepared following industry guidance. It includes a detailed assessment of the designated and non-designated heritage assets likely to experience changes to their setting as a result of the Proposed Development. The list of assets scoped into the assessment was agreed with Buckinghamshire Council and Historic England. The individual heritage assets, including the post-medieval and medieval field systems, are assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** in line with industry practice and planning policy. The landscape character of the Order Limits and surrounding area are considered within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**.
3.1.2	CSAG (Heritage Critical Review, paragraph 3.6.5)	Comment noting that the Proposed Development would occupy a substantial area of landscape, which formerly comprised the extensive open fields associated with the surrounding settlements. It needs to be recognised that the nature and extent of the existing agricultural landscapes across and around the Proposed Development are of historical importance in their own right.	**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]** have considered the impacts of the Proposed Development on the medieval and post-medieval field systems which survive within the Order Limits and has recognised the contribution that the agricultural surroundings make to the significance of the designated and non-designated heritage assets, including the Conservation Areas and East Claydon village. The agricultural landscape within the Order Limits is not subject to any designations nationally for heritage or for landscape value. Fields D28/29 are regionally valued and directly affected by Solar PV but are located away from the settlements, effects on the regional landscape designation are considered within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**.
3.1.3	CSAG (Heritage Critical Review, paragraph 3.6.6)	Comment noting that irrespective of any proposed mitigation planting or screening, the fundamental change in landscape character brought about by the Proposed Development will have a significant effect on the legibility and coherence of this historic landscape as well as impact upon a number of designated and non-designated heritage assets within and surrounding the Proposed Development area.	The Applicant disagrees that the mitigation planting and screening would not reduce the effect of the Proposed Development. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/66.2.2]** recognises that there would be a significant effect on the landscape character within the Order Limits but does not recognise that this would be an industrialising influence on the landscape as a whole. This matter is more fully addressed within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see pages 46-48). The embedded and proposed mitigation measures set out within the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** and **Outline LEMP [EN010158/APP/7.6.3]** and secured through DCO Requirement 3 (requirement for written approval), DCO Requirement 4 (detailed design approval) and DCO Reandscape and Ecological Management Plan) set out within the **Draft DCO [EN010158/APP/3.1.4]** mean that the legibility and coherence of the historic landscape will be maintained and the harm to the significance of designated and non-designated heritage assets around the Proposed Development will be at the lower end of less than substantial harm. The Applicant has reached agreement with Historic England and National Trust regarding the level of harm to the significance of the assets which they have focused their responses on and has reached agreement with Buckinghamshire Council that the harm to the designated and non-designated heritage assets is less than substantial. These matters of agreement are documented within the **Statement of Common Ground with Historic England [EN010158/APP/5.16.2]**, **Statement of Common Ground with National Trust [EN010158/APP/5.17.2]** and **Draft**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] submitted at Deadline 2.
3.1.4	CSAG (Heritage Critical Review, paragraph 4.1.1)	Comment noting that a 5km buffer has been extended around the Site when considering the potential impact upon designated heritage assets, while a 1km buffer has been used for non-designated heritage assets. These boundaries are considered to be more than sufficient.	The Applicant welcomes agreement that the study areas are more than sufficient. These study areas were agreed with Buckinghamshire Council and Historic England at the EIA Scoping stage.
3.1.5	CSAG (Heritage Critical Review, paragraph 4.1.4)	Comment noting that although the Archaeological Desk-based Assessment and Setting Assessment are thorough, the format of the documents and the manner in which the information is presented makes it very difficult to identify which are the most affected heritage assets. The majority of heritage assets within a 1km and 5km radius of the Site will not be directly affected by the Proposed Development, but there is no summary of the assessment's conclusions or list of the assets which are most affected.	The Applicant agreed the assets likely to experience effects with Buckinghamshire Council and Historic England and these assets are included in the detailed setting assessment at Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** and within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** which includes a summary of the effects at Table 9.15
3.1.6	CSAG (Heritage Critical Review, paragraphs 4.3.6 & 4.3.7)	Comment noting disagreement with the conclusion of the Applicant's assessment of heritage impact that the construction of the Proposed Development within the views to and from Claydon Park will result in a low level of less than substantial harm being caused. CSAG considers that the impact assessment underplays the contribution which the agricultural setting and the designed views and routes across it make to the significance of the park and the impact which the Proposed Development will have upon the setting of the park.	The Applicant disagrees. Taking the significance of Claydon Park "in the round" the effect of the impact of the Proposed Development within views to and from the Park would be at the lower end of less than substantial harm. The contribution of the agricultural setting of Claydon Park has been acknowledged within the assessment and throughout the design of the Proposed Development. The Order Limits were pulled back to the south of Calvert Road and Solar PV was removed from Fields SA12, SA134, SA14, SA15, SA26 and SA33 to preserve agricultural land south of Claydon Park and Solar PV was also removed from Field B17 on Knowl Hill to retain the appearance of agricultural land in the wider estate from key views within the park. As noted above, the Applicant has reached agreement with National Trust that the harm to the significance of Claydon as a result of the Proposed Development causing change within its setting will be at the lower end of less than substantial, this agreement is documented within the **Statement of Common Ground with National Trust [EN010158/APP/5.17.2]** submitted at Deadline 2.
3.1.7	CSAG (Heritage Critical Review, paragraphs 4.4.1.4, 4.4.1.5 & 4.4.1.6)	Comment noting that the Applicant's assessment of heritage impact concludes that the construction of the Proposed Development within the views to and from Claydon House will have a negative impact on the contribution which the existing agricultural landscape makes to the significance of this Grade I Listed Building. This would result in a low level of 'less than substantial harm'. CSAG considers that the impact assessment underplays the contribution which the agricultural setting and the designed views and routes across it make to the significance of Claydon House and the impact which the Proposed Development will have upon the setting of the house and park complex. CSAG consider that the impact lies towards the middle of the 'less than substantial' spectrum, rather than at the lower end.	The Applicant's assessment has followed standard industry practice and relevant guidance on assessing the effects of changes in the setting of heritage assets. Historic England agree with the conclusions of the assessment that the harm to the significance of Claydon House Grade I listed building would be at the lower end of less than substantial harm. This agreement is set out within the **Statement of Common Ground with Historic England [EN010158/APP/5.16.2]** submitted at Deadline 2. The complex of interconnected listed buildings is recognised within the designations of Claydon Park and Middle Claydon Conservation Area which are both assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Further comment noting that assessing the harm to the Grade I listed building in isolation from the heritage harm caused to the complex of interconnected listed buildings which stand within the park results in a lower perception of the cumulative heritage impact upon the Claydon House and Park complex.	
3.1.8	CSAG (Heritage Critical Review, paragraph 4.4.1.9)	Comment noting that the Applicant has not assessed the heritage impact on the following two listed buildings which also form part of the Claydon House complex: • Stables for Claydon House (Grade II; NHLE1214707): The brick stables (1754) form three sides of a large grass courtyard, with the east front of the house forming the fourth side; and • North Lodges (Grade II; NHLE 1214706).	The Applicant disagrees. Both the Stables for Claydon House and North Lodges listed buildings were included in the assessment (North Lodge at **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** paragraphs 9.10.8-9, 9.10.62-63 and 9.10.116-117 and the Stables at **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** paragraphs 9.10.10-11, 9.10.64-65 and 9.10.118-119). The assessment concluded that the impacts as a result of changes in their setting would be negligible, resulting in a neutral effect that would be not significant.
3.1.9	CSAG (Heritage Critical Review, paragraph 4.4.2.1)	Comment noting that there are a number of farmhouses and related buildings which lie in close proximity to the Site. The agricultural land contained within the development area forms an important part of their setting and contributes towards their significance, and the change of landscape character brought about by the Proposed Development has the potential to harm this significance.	The Applicant agreed with Buckinghamshire Council and Historic England which farmhouses and related buildings required detailed assessment. The assessment has included consideration of the contribution to significance made by the surrounding agricultural land which forms their setting. **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** concludes that there would be less than substantial harm to Pond Farmhouse (at the middle of this scale), and to Blackmoorhill Farmhouse, Rosehill Farmhouse, Dry Leys Farmhouse and Muxwell Farmhouse at the lower end of this scale. The Applicant has reached agreement with Buckinghamshire Council that the harm to these farmhouses and associated buildings would be less than substantial, this agreement is set out within the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2]** submitted at Deadline 2.
3.1.10	CSAG (Heritage Critical Review, paragraph 4.4.2.2 & 4.4.2.3)	Comment noting that at the western end of the Site, the Grade II listed Pond Farmhouse will be completely encircled by solar panels within Parcel 1. The Applicant's assessment of heritage impact concludes that the construction of the Proposed Development will have a strong negative impact on the contribution to which the existing agricultural landscape makes to the significance of the listed building, resulting in less than substantial harm within the middle of the range. CSAG considers this assessment to be too low.	The Applicant disagrees; the design of the Proposed Development retains agricultural land to the east and north of Pond Farmhouse by creating offsets from the areas of Solar PV development, this embedded mitigation along with existing woodland to the southeast of the farmhouse will reduce the sense that the farmhouse is encircled by development. The Applicant's assessment recognises that the change to the agricultural character of the building's surroundings will represent "changes to setting of an asset, such that the significance of the asset is compromised" (based on the criteria within Table 9.6 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**) and as such would be harm within the middle of the scale of less than substantial. Harm towards the upper end of less than substantial harm (as suggested by CSAG) would require *"comprehensive change to the setting such that the significance of the asset is severely compromised"*. As significance derives not only from setting but from other elements which in the case of Pond Farmhouse will not be altered (such as its inherent architectural and historic interest and its historic relationship with Claydon House and Park), the Applicant considers that the lower magnitude adequately reflects the impact.
3.1.11	CSAG (Heritage Critical Review, paragraph 4.5.4)	Comment noting that the Applicant's assessment of heritage impact concludes that the construction of the Proposed Development within the setting of the Middle	**ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** recognises the relationship between Claydon Park, Claydon House and Middle Claydon Conservation Area. The importance

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Claydon Conservation Area would result in a low level of less than substantial harm being caused to the significance of the Conservation Area. CSAG considers that this conclusion underplays the significance of the relationship between Claydon Park, Claydon House and the surrounding agricultural landscape, and that the level of identified 'less than substantial harm' lies nearer to the middle of the scale.	of the conservation area has been elevated in the assessment due to its relationship with the Park and House. The Applicant maintains that the harm to the significance of Claydon House and Claydon Park would be at the lower end of less than substantial and has reached agreement with Historic England and National Trust regarding the level of harm to Claydon House and with National Trust regarding the level of harm to Claydon Park (as noted above this agreement is set out within the Statements of Common Ground submitted at Deadline 2). The Conservation Area is largely contiguous with Claydon Park but includes areas outside the registered park to the north which would experience no visual change as a result of the Proposed Development and the relationship between these areas and the Park would be unaffected. The Applicant therefore maintains that the harm to the significance of the Conservation Area would be at the lower end of less than substantial.

Table 3-2: Cultural Heritage (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
Effects on Cultural Heritage, including Designated and Non-Designated Heritage Assets			
3.2.1	Grendon Underwood Parish Council (Page 2)	Comment noting that the Proposed Development would be damaging to heritage. Further comment that the Proposed Development would be intrusive and highly visible from a large number of nearby heritage assets such as Claydon house, which would impact the experience for current and future generations.	The Applicant has recognised the potential for the Proposed Development to impact on heritage and throughout the design process has sought to minimise this impact. This has included embedded mitigation measures to limit visibility of the Solar PV development and other infrastructure from Claydon House and to create offsets around the Conservation Areas and other villages and listed buildings to maintain their setting. The Applicant has reached agreement with Historic England, National Trust and Buckinghamshire Council that the harm to the significance of heritage assets through changes in their setting would be less than substantial and this agreement is set out within the Statements of Common Ground submitted at Deadline 2. The Applicant has also agreed with Buckinghamshire Council in consultation with Historic England that the loss of the non-designated archaeological remains within Parcel 3 can be adequately mitigated through a programme of post-DCO consent archaeological mitigation as detailed within the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094]** which is secured through a DCO Requirement. This is also set out within the draft Statement of Common Ground with Buckinghamshire Council submitted at Deadline 2.
3.2.2	Edgcott Parish Council (Page 2)	Comment noting that the Proposed Development would be damaging to heritage. Further comment that the Proposed Development would be intrusive and highly visible from a large number of nearby heritage assets such as Claydon house, which would impact the experience for current and future generations.	See response to Grendon Underwood Parish Council (see **Ref. 4.2.1**) above.
3.2.3	East Claydon Parish Council (Page 2, Para. 6)	Comment noting that recent housebuilding was refused in the area as it would damage cultural heritage, which attracted many residents.	The Applicant notes this comment and the decision of Buckinghamshire Council to conclude that a number of sites in and around both Botolph and East Claydon were deemed unsuitable for housing promotion for reasons not limited to cultural heritage harm. It is important to recognise that sites are assessed on their individual merits. Therefore, these decisions by Buckinghamshire Council do not mean the Site is unsuitable for the Proposed Development, which is to be determined by the relevant SoS due to the Proposed Development constituting an NSIP. Moreover, the size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location. The Proposed Development is also, unlike other forms of development, temporary and reversible in its effects on built heritage.

Table 3-3: Cultural Heritage (Other Interested Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
Effects on Cultural Heritage, including Designated and Non-Designated Heritage Assets			
3.3.1	REP1-159, REP1-164, REP1-168, REP1-190, REP1-225, REP1-300	**Botolph Claydon Conservation Area** Comment that the Proposed Development would detract significantly from the setting of heritage assets in and of the Botolph Claydon Conservation Area.	The Applicant has recognised the potential impact on Botolph Claydon Conservation Area and the individual buildings within it. The **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** includes embedded mitigation for Botolph Claydon including pulling back the Order Limits south of Botolph Claydon and further offsets within the Order Limits from the areas closest to the Conservation Area to reduce visibility of the Proposed Development, siting the BESS, Rosefield Substation and Collector Compounds in Parcels 2 and 3 on lower lying ground to reduce their prominence, hedgerow enhancements and including offsets from PRoWs to reduce the effects on users approaching Botolph Claydon. The effects following embedded and additional mitigation are summarised in Table 9.15 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**. The Applicant has agreed with Buckinghamshire Council that the harm to the significance of Botolph Claydon Conservation Area and the heritage assets within it as a result of the Proposed Development would be less than substantial.
3.3.2	REP1-164, REP1-250, REP1-274	**Botolph Claydon Conservation Area** Comment that mitigating impacts on Claydon House has been prioritised over mitigating impacts on properties in Botolph Claydon, many of which are much older than Claydon House and are also located in a Conservation Area.	Claydon House is Grade I listed and therefore one of the most important buildings nationally. With the exception of Botolph House (grade II* listed) the buildings within Botolph Claydon are Grade II listed or not designated and therefore given less policy protection, Conservation Areas are not of national importance being a local designation. As such the Applicant considers it reasonable and in line with planning policy to have prioritised mitigating the effects on Claydon House. The Applicant has sought to minimise the effects on Botolph Claydon Conservation Area and Botolph House as detailed in the response directly above. Further to this, the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** explains how the design of the Proposed Development has evolved to consider views from Botolph Claydon and the Botolph Claydon Conservation Area. Fields D1, D2, D3 (north) and D5 which were closest to the Conservation Area were no longer considered for Solar PV development following Phase One Consultation, to reduce potential effects on residential properties and the setting of Botolph Claydon and the Botolph Claydon Conservation Area. Following Phase Two Consultation, these fields were removed from the Order Limits altogether and the closest part of the Order Limits is approximately 175m from the Conservation Area. These changes have ensured that the Proposed Development has minimal visibility from the Conservation Area and that the Conservation Area would continue to be experienced within a largely agricultural setting on the approaches from the west and north.
3.3.3	REP1-120	**Claydon House** Comment that there would be a negative impact on views from Claydon House which will negatively affect how it is enjoyed and understood.	As set out within the response to Buckinghamshire Council's LIR and the SoCGs with Historic England, National Trust and Buckinghamshire Council, the Applicant has assessed that the impact on the views from Claydon House would represent harm to its significance at the lower end of less than substantial. As illustrated on the photomontages submitted in the updated **ES Volume 4, Appendix 10.6: LVIA Visualisations Claydon House [EN010158/APP/6.4.3]** at Deadline 2, Solar PV development and the Satellite Collector Compound in Parcel 1 would be visible only obliquely from the upper floors of Claydon House and glimpsed through vegetation at ground level from the western terrace. The Applicant has reached agreement with Historic England and National Trust that the harm to Claydon House would be at the lower end of less than substantial, this agreement is set out within the SOCGs submitted at Deadline 2.

3.3.4	REP1-188, REP1-291	**Farmland** Comment that the historic character of the farmland and farming community would be destroyed.	As set out in the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]** (paragraphs 4.5.6, 4.5.50 and 4.5.65) 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 fieldscape within the Order Limits will remain one of regular and irregular enclosures and the only long-term loss of agricultural land use would be within the area of the Rosefield Substation and BESS. As set out within the **Design Commitments [EN010158/APP/5.9.4]** equipment within the Main Collector Compound will be grey, green, white and/or metallic. Proposed buildings and/or containers within the Main Collector Compound and Satellite Collector Compounds will be grey or painted green in colour and rendered to suit local building styles, be sensitive to the local environment and seek to reflect agricultural development. As detailed within the **Outline LEMP [EN010158/APP/7.6.3]** land beneath the Solar PV modules would be suitable for creation of neutral grassland with legume species, whilst areas of mitigation for ground nesting birds and bats would have potential for grazing by sheep and cattle thereby retaining an agricultural character within the Order Limits.
3.3.5	REP1-197, REP1-233	**Farmland** Comment that the fields around Sion Hill show remnants of old ridge and furrow fields.	The ridge and furrow fields have been assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**. Those in closest proximity to Sion Hill lie within the siting zone for the National Grid East Claydon Substation which will be subject to a separate consent to be applied for by the National Grid. Trace evidence of ridge and furrow overlying the Iron Age and Romano-British remains was found during trial trenching of the proposed Rosefield Substation and Main Collector Compound siting zone within Parcel 3. A programme of archaeological mitigation has been agreed with Buckinghamshire Council for the impacts of these parts of the Proposed Development, this agreement is set out within the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2]** submitted at Deadline 2.
w	REP1-120, REP1-225, REP1-229, REP1-233, REP1-262, REP1-282	**General comment** Comment that the Proposed Development would have a negative impact on the cultural heritage of the local area and landscape character.	The impacts on cultural heritage have been assessed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**. The Applicant has reached agreement with Buckinghamshire Council, Historic England and National Trust that the impacts would result in at most less than substantial harm to the significance of the heritage assets.
3.3.7	REP1-142, REP1-168, REP1-190, REP1-197, REP1-225	**Historic buildings** Comment that there are many historic buildings in the area which would be negatively impacted. Specific references made to Sion Hill Farm and old coaching inn on St Mary's Road	The historic buildings included within the assessment were agreed with Buckinghamshire Council and in consultation with Historic England and National Trust. No concerns were raised by these parties with regard to Sion Hill Farm or the old coaching inn, neither of which were requested to be included in the assessment by any of these parties.

Table 4-1: Cumulative Effects (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Cumulative Effects from the Proposed Development and Other Projects	
4.1.1	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (Page 1)	Comment noting the existing pressure on the landscape from HS2 and East West Rail, and that the Proposed Development risks compounding fragmented habitats. Further comment that the cumulative effect could be colossal for local biodiversity.	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. 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. The Applicant considers that operational impacts on the land would be temporary as the Proposed Development would be decommissioned after the 40-year operational lifespan after which the land would be reinstated.
4.1.2	CSAG (Page 3, Paras. 6 and 7)	Comment noting that the area local to the Proposed Development is an area with major developments taking place (examples provided include HS2, EWR, Statera BESS and Tuckey Solar Farm) and that the Order Limits currently provide a valuable oasis for agriculture, amenity and wildlife separating these areas of development. Further comment that this would be lost should the DCO Application be consented.	The Applicant recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms. This assessment concludes that there are likely significant inter-project residual cumulative effects on landscape and visual and biodiversity following the implementation of embedded and additional mitigation measures. The Applicant notes the comments made and confirms that the size and location of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts; such as to amenity and wildlife. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** also highlights the wider benefits that the Proposed Development would bring to the local community and environment, including: • proposed permanent enhancements to connectivity within the local area through the rationalising and enhancement of the network of PRoWs; • the creation of three permissive paths; • providing a variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland open fields; scrub and margins

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			with wildflower; the planting of hedgerows and tree belts; the establishment of ecological ponds (either former ponds for recreation or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds. Further detail of these benefits are captured and secured within the **Outline LEMP [EN010158/APP/7.6.3]**; • delivering a BNG in excess of 10%, as secured within the **Outline LEMP [EN010158/APP/7.6.3]**. This has been assessed through **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** which calculates that the Proposed Development would deliver a net gain of 49.99% for habitats area units, a net gain of 21.16% for hedgerow units, and a net gain of 12.73% for watercourse units. Beyond delivering BNG in excess of 10% as secured in the **Outline LEMP [EN010158/APP/7.6.3]**, Requirement 7 of the **Draft DCO [EN010158/APP/3.1.4]** secures the delivery of a minimum biodiversity net gain of 40% for habitats area units, a net gain of 17% for hedgerow units, and a net gain of 10% for watercourse units. The Applicant is seeking to secure a lesser BNG amount than what **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** sets out, while still committing to more than the minimum of 10%, to allow for flexibility at the design stage; and • providing interpretation boards for Claydon House and Claydon Registered Park and Garden on the proposed permissive path to Knowl Hill to better reveal the significance of the assets and improve appreciation and understanding of it as secured by the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]** and the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.3]**.
4.1.3	CSAG (Page 19, Para. 82)	Comment noting that the Cumulative Effects Chapter addresses cumulative impacts and that these assessments did not play a part at the Site selection stage. Further comment noting that the consideration of which developments should be considered within the cumulative effects assessment with Buckinghamshire Council was not had until June 2025 and that no other stakeholders were contacted.	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.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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 remains 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. The Applicant undertook engagement with Buckinghamshire Council on the long and short list of cumulative developments that formed part of the assessment and this was subsequently agreed with Buckinghamshire Council as detailed in the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2]**. A preliminary assessment of cumulative effects was undertaken and provided within the Preliminary Environmental Information Report published at Statutory Consultation, which provided other stakeholders the opportunity to provide comments on the preliminary impacts and other developments to be considered.
4.1.4	CSAG (Page 36 and 37, Para. 163 and Page 57, Para. 33)	Comment that there is no assessment of cumulative or in-combination effects with other proposed and ongoing development in the area. Further comment noting that the Cumulative Effects Chapter proports to have considered inter-project effects but that it lacks credibility due to an assumption that the other developments would have adequate mitigation in place.	An assessment of cumulative and in-combination effects with other existing development and/or approved developments is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This assessment provides a comprehensive assessment of the cumulative context 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. The Applicant has undertaken an assessment of inter-project effects which is provided in Section 17.6 – 17.7 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. It is reasonable to assume that the other proposed developments would have best practice mitigation in place, such as the implementation of pollution prevention measures.
4.1.5	CSAG (Page 271)	Comment that the Applicant should include 23/03875/APP (Development of a battery energy storage system (BESS)) in the analysis of cumulative impacts.	This proposed development (23/03875/APP), referred to as the East Claydon BESS, has been considered and forms part of the short list of developments which has been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].**
4.1.6	CSAG (Page 271)	Comment that two further applications for electrical infrastructure projects are under consideration by Buckinghamshire Council. If approved, they would have significant cumulative impacts on top of the Proposed Development and existing infrastructure schemes.	The Applicant is aware of further applications that are currently under consideration by Buckinghamshire Council and these have been included in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** in agreement with Buckinghamshire Council, where detailed information is available. All committed developments have been considered in the transport reviews provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4,**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** The traffic effects of the Proposed Development are temporary and not significant in all cumulative scenarios modelled. As such, the disruption to the road users is not significant and will not adversely affect access to local facilities.
4.1.7	CSAG (Page 320)	Comment requesting inter and intra-project cumulative impact assessments which encompass likely significant impacts. Further comment that the assessments should include but aren't limited to: • Habitats and species • Residents • Highway users • Users of PRoWs • Local businesses • Tourism	An assessment of inter and intra-project cumulative effects has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** This chapter provides a detailed cumulative assessment on biodiversity (including habitats and species), Population (including tourism, users of PRoW, local business and residents), Landscape and Visual (impacts to PRoW) and Transport and Access (including consideration of highway users and impacts on traffic).
		Co-ordination with Other Projects in the Vicinity	
4.1.8	NGET Limited (Paras. 2.1 and 2.2)	Comment confirming that the extent of planned future NGET infrastructure works will include: • The East Claydon Project which will see the rebuilding and replacement of the 400kV and 132kV substations; and • The reconfiguration of existing overhead lines. Further comment noting that NGET have identified a site immediately adjacent to the west of Existing Substation for the New Substation.	The Applicant confirms understanding of NGET's proposals for planned infrastructure works and the two parties are actively engaging on a regular basis to manage the technical interfaces between the projects.
4.1.9	NGET Limited (Paras. 2.9 and 6.1)	Comment noting that productive discussions are occurring between the Applicant and NGET and that the agreement of adequate protective provisions will be essential in the collaborative arrangement between the projects.	The Applicant confirms that negotiations to agree bespoke protective provisions with NGET are progressing positively. The Applicant considers that the bespoke protective provisions (and any necessary commercial agreement) will provide adequate protection to NGET and enables land and rights to be acquired for the Proposed Development without serious detriment to the carrying on of the undertaking concerned.
4.1.10	NGET Limited (Paras. 3.2 and 3.3)	Comment noting that protective provisions have been submitted to the Applicant and include the following protections: *"(i) the Applicant will not exercise its compulsory powers over NGET operational land without the consent of NGET;*	As noted above, the Applicant and NGET are progressing negotiations for bespoke protective provisions in a positive and constructive manner, and the protective provisions will address these points raised. The Applicant is confident that the protective provisions will be agreed before the end of examination.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		(ii) the Applicant will not exercise its compulsory powers over land identified for the delivery of the East Claydon Project without the consent of NGET; and *(iii) that all NGET assets, both existing and any anticipated future assets, are adequately protected and that all works comply with relevant safety standards"*. Further comment noting that the above approach has been required on other DCO project and that this is considered to be a proportionate approach.	
4.1.11	NGET Limited (Para. 3.5)	Comment recognising the Applicant's design approach to the Proposed Development (i.e., the adoption of the 'Rochdale Envelope') and that, as more certainty emerges, the Applicant would revisit flexibility matters with NGET (as noted in CAH1).	The Applicant confirms this is the case: once more certainty emerges around the East Claydon Project, the Applicant will be in a position able to refine the flexibility currently sought in respect of the Grid Connection Cabling Corridor.
4.1.12	NGET Limited (Para. 4.1 and Table 4.2)	Comment noting the clearances that will be required for the benefit of the East Claydon Project. Further comment, through Table 4.2 of the WR of the type of clearances required and a description of the extents. These are summarised as follows: • Access Clearances: 30m clearance around tower bases and overhead lines to allow safe HGV access and emergency maintenance, and that electrical safety clearances; • Electricity Clearance from OHLs: Minimum vertical 7.3m clearance between an OHL, factoring sag, and the ground; and • Existing OHL Clearances on Site: Established 30m either side of OHLs and the existing towers on OHLs (East Claydon to Cowley, East Claydon to Amersham-Iver and East Claydon to Leighton Buzzard-Sundon).	The Applicant acknowledges, and confirms it will comply with, the statutory requirements provided in 'Technical Guidance Note 287 - Third-party guidance for working near NGET equipment' ('TGN 287'). • A minimum vertical clearance of 7.3m will be ensure between the ground level and OHLs. This clearance will increase to 9.2m when OHLs are crossing access and AIL roads, as per guidance provided by NG. The Proposed Development would be designed to take account of NGET's statutory obligations to both construct and maintain their assets and that doing so would remove any perceived or actual conflicts across all phases of the development of the East Claydon Project and the Proposed Development. The Applicant is confident that the DCO Application (as submitted) contains sufficient flexibility for the final siting and works to construct and maintain NGET's infrastructure to ensure that, regardless of the final design for the East Claydon Project, the Proposed Development would not prejudice the delivery of NGET's works and would also itself remain deliverable. **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]** include a note that acknowledges that appropriate offsets from the overhead lines and transmission towers will need to be incorporated into the design of the Proposed Development when the final alignment relative to the National Grid East Claydon Project are determined.
4.1.13	NGET Limited (Para. 4.4)	Comment noting that a 30m easement, in accordance with TG 287 Note guidance, will be required from a tower's base and that protective covenants are required to maintain operational access.	The Applicant acknowledges, and confirms it will comply with, the statutory requirements provided in TGN 287. This Technical Guidance Note 287 - Third-party guidance for working near NGET equipment ("TG 287 Note") provides an overview of the statutory requirements for working near high-voltage electricity, including electrical safety clearances, minimum access clearances, and risks and hazards when developing close to electrical infrastructure.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The Applicant is actively engaging with NGET on a regular basis to manage the technical interfaces between the projects, and negotiation of protective provisions is ongoing between both parties.
4.1.14	NGET Limited (Para. 4.6)	Comment noting the OHL congestion to the south of the existing substation and that tower turn-ins will likely be required and may require the following works: • The repositioning of existing towers; • The placement of towers at varying heights that may or may not be temporary; • Oversailing; • New OHL(s); and • The restringing of the existing OHL.	The Applicant is actively engaging with NGET on a regular basis to manage the technical interfaces between the projects, and negotiation of protective provisions is ongoing between both parties. The Applicant is confident that the DCO Application (as submitted) contains sufficient flexibility for the final siting and works to construct and maintain NGET's infrastructure to ensure that, regardless of the final design for the East Claydon Project, the Proposed Development would not prejudice the delivery of NGET's works and would also itself remain deliverable. The Applicant acknowledges that the final location and timing of works has not been confirmed by NGET. Due to the Applicant taking a Rochdale Envelope Approach to the DCO Application, the Proposed Development includes flexibility to account for a connection into the replacement substation or the existing substation. The DCO Application also seeks to allow flexibility in Rosefield Substation siting approach so that the most efficient use of land is carried out and development space is not inefficient and wasteful. The Proposed Development would be designed to take account of NGET's statutory obligations to both construct and maintain their assets and that doing so would remove any perceived or actual conflicts across all phases of the development of the two projects. **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]** include a note that acknowledges that appropriate offsets from the overhead lines and transmission towers will need to be incorporated into the design of the Proposed Development when the final alignment relative to the National Grid East Claydon Project are determined.
4.1.15	NGET Limited (Para. 5.1)	Comment noting the good progress made on the planning application for the East Claydon Project and that on-going discussions are being held with landowners where voluntary agreements are sought.	The Applicant notes this comment.

Table 4-2: Cumulative Effects (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Cumulative Effects from the Proposed Development and Other Projects	
4.2.1	Hogshaw Farm & Wildlife Park LTD (Page 1)	Comment noting concerns over the cumulative effect of the Proposed Development given the existing pressures of existing major infrastructure projects such as the frequent road closures and access disruption caused by projects including HS2 and East West Rail. Further comment noting that access is essential for rural visitor attraction, particularly families and school groups.	An assessment of cumulative and in-combination effects with other existing development and/or approved developments is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This assessment provides a comprehensive assessment of the cumulative context 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 10 km Zone of Influence. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** considers the cumulative impacts to transport and access and concludes that traffic effects of the Proposed Development are temporary and not significant in all cumulative scenarios modelled. As such, the disruption to the road users is not significant and will not adversely affect access to local facilities such as Hogshaw Farm & Wildlife Park. Mitigation measures to reduce any impacts to traffic are detailed and secured in the **Outline CTMP [EN010158/APP/7.5.3].**
4.2.2	Hogshaw Farm & Wildlife Park LTD (Page 2)	Comment raising concerns about the scale and location of the Proposed Development and the cumulative impact on the local area, including businesses and the rural setting. Further comment that this has not been correctly assessed by the Applicant in relation to Hogshaw Farm & Wildlife Park as a rural tourism business.	With regard for the scale and location of the Proposed Development, 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 recognises that there are several other developments in construction or planned within the local area and this has been considered in the development of the design. An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms. The assessment concludes that there are likely significant inter-project residual cumulative effects on landscape and visual and biodiversity following the implementation of embedded and additional mitigation measures. Aside from landscape and visual effects, there are not considered to be any other significant environmental effects from cumulative projects on the tourist economy or its components including Hogshaw Farm & Wildlife Park. As such, it is likely that the cumulative effect on this receptor in terms of its contribution to the tourist economy and its viability as a rural land-based business would be limited to the same scale of effect as for the Proposed Development in isolation, and is not likely to be significant given the limited environmental scope of change, localised and

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			subjective effects, in the context of the substantial and diverse offer of the tourist economy and the viability of individual businesses which is not solely driven by landscape and visual amenity.
4.2.3	Preston Farms and TCS Biosciences Ltd (Page 61, Para 4)	Comment noting concerns with cumulative impacts from HS2, East West Rail, Grendon Underwood Mega Prison and the Statera BESS on land directly adjacent to the Site.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** confirms that the only potential significant cumulative effect is on landscape and visual receptors, and Bechstein's bats. There is not anticipated to be a cumulative significant impact from noise, transport, or air pollution on sensitive receptors. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** undertakes a comprehensive assessment of the cumulative effects including impacts from HS2, East West Rail, Grendon Prison and East Claydon BESS. The short list of projects that has been assessed has been discussed and agreed with Buckinghamshire Council. This approach aligns with the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024) guidance and applies a precautionary 10 km 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, that no significant inter-project cumulative effects would arise, with the exception of potential impacts on landscape and visual, and Bechstein's bats. The potential impact on landscape and visual is due to an increase in significant effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill and Station House during operation (including maintenance) (Year 1 and Year 10); on the residents of Granborough during construction, operation (including maintenance) (Year 1); and for significant effects to extend for the full duration of operation from the North Buckinghamshire Way and The Midshires Way. Of these significant cumulative effects, only those for the North Buckinghamshire Way and The Midshires Way would be sequential. It is considered that these cumulative effects would extend to a defined area, no more than approximately 2km beyond the Order Limits to the southeast of Parcel 2, which would not amount to 'impacts across the district'. The Applicant therefore maintains that the potential cumulative impacts are not atypical considering the nature and scale of the Proposed Development. There is 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]** and **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6.3]**.
4.2.4	Grendon Underwood Parish Council (Page 2)	Comment noting that agricultural land has already been and will continue to be lost due to other infrastructure projects, and that the cumulative impact must be taken into account as the Proposed Development would add to the problem.	A cumulative assessment for soils and agriculture has been undertaken which considers projects within 1km from the Site as detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** No significant cumulative effect on agricultural land was found and, noting that only 1.51% of the Site is considered to be BMV land, further assessment was not considered necessary.
4.2.5	Grendon Underwood Parish Council (Pages 2 and 3)	Comments relating to other nearby infrastructure projects, including other solar farm developments and HS2 are mentioned, with concerns raised about the potential	An assessment of cumulative and in-combination effects with other existing development and /or approved developments is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This assessment provides a comprehensive assessment of the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		cumulative effect on local facilities, especially the road network. Further comment highlighting the cumulative effect resulting from the pipeline of BESS upgrades and future housing schemes.	cumulative context identified through the long-list and short-list methodology, which includes several BESS projects and housing schemes. The short list of other existing development and/or approved developments 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. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** considers the cumulative impacts to transport and access and concludes that traffic effects of the Proposed Development are temporary and not significant in all cumulative scenarios modelled. As such, the disruption to the road users is not significant and will not adversely affect access to local facilities. Mitigation measures to reduce any impacts to traffic are detailed and secured in the **Outline CTMP [EN010158/APP/7.5.3].**
4.2.6	Edgcott Parish Council (Page 2)	Comment that the cumulative effects of the Proposed Development and other nearby infrastructure projects need to be taken into account.	An assessment of cumulative and in-combination effects with other existing development and /or approved developments is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This assessment provides a comprehensive assessment of the cumulative context 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.
4.2.7	Twyford Parish Council	Comment noting the stress the land is already under as a result of HS2 and East West rail, noting this has implications	While the Applicant acknowledges that this is an area where multiple large-scale developments are proposed or consented, the assessment concludes, based on detailed topic-level evaluation, that no significant inter-project cumulative effects would arise, with the exception of potential impacts on landscape and visual, and Bechstein's bats. **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 for the purposes of the assessment.
4.2.8	East Claydon Parish Council (Page 1, Para. 4)	Comment noting the adverse effects caused by infrastructure development over the last few years which have included noise from construction, damage to roads and PRoWs, speeding cars as the result of commuting contractors, construction traffic, and littering by construction workers and contractors.	The Applicant has undertaken a detailed assessment of construction noise which concludes that there would be no significant effects. The assessment is provided in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** Mitigation measures to reduce noise during construction, which include using temporary enclosures and minimising drop heights are detailed and secured in the **Outline CEMP [EN010158/APP/7.2.3].** The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The **Outline CTMP [EN010158/APP/7.5.3]** already provides for a

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Wear & Tear Agreement to protect the condition of the public road and contractor staff expectations with regards to access. The Applicant is committed to adhering to the Considerate Constructors Scheme (CCS) which will assist in reducing pollution (including littering) and nuisance from the Proposed Development, by employing good practice measures which go beyond statutory compliance. This is set out and secured in the **Outline CEMP [EN010158/APP/7.2.3].**
4.2.9	East Claydon Parish Council (Page 2, Para. 5)	Comment noting further disruption from the East Claydon substation, Tuckley Solar Farm, Statera BESS, and expansion of Grendon Underwood prison, and that the cumulative impact is already massive without adding the Proposed Development to that.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** undertakes a comprehensive assessment of the cumulative effects including impacts from the proposed East Claydon Substation, Tuckey Solar Farm, East Claydon BESS and Grendon Prison. While the Applicant acknowledges that this is an area where multiple large-scale developments are proposed or consented, the assessment concludes, based on detailed topic-level evaluation, that no significant inter-project cumulative effects would arise, with the exception of potential impacts on landscape and visual, and Bechstein's bats.

Table 4-3: Cumulative Effects (Other Interested Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Cumulative Effects from the Proposed Development and Other Projects	
4.3.1	REP1-159	**Approach to assessment** Comment that impacts from the Proposed Development have been considered in silos by topic, obscuring potential intra-project effects which has subsequently undermined the assessment of cumulative effects.	An assessment of intra-project cumulative effects has been undertaken and is provided in Section 17.5 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** The interaction between the likely effects on the receptors has been examined in order to determine an overall likely combined significance of the impacts of all identified likely residual effects in interaction. The Applicant will be submitting an Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes Report at Deadline 3 to provide further detail.
4.3.2	REP1-155	**Ancient trees and hedgerow** Comment that other infrastructure projects have decimated ancient trees and hedgerows and this will be exacerbated by the Proposed Development.	As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] RR-026 (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],** all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV modules to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. Additionally, the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.3]** are sufficient to protect ancient woodland.
4.3.3	REP1-159, REP1-216	**Battery storage** Comment that the assessment of cumulative effects should consider the risk of fire from multiple BESS installations.	The cumulative effects of the Proposed Development during the operational (including maintenance) phase alongside other existing developments and/or approved developments, including the approved East Claydon BESS has been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. A site-specific **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development including atmospheric dispersion modelling and submitted at Deadline 1. This has demonstrated that the risk to the population remains very low. As outlined in the **Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.3]**: *As a minimum, the battery system will have completed unit or installation level UL 9540A (5th Edition) testing (Ref), the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026 revision) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc.* Section 7 of the **Outline BSMP [EN010158/APP/7.9.3]** covers pre-construction requirements for the Proposed Development and stipulates that extensive risk assessment reports and rigorous consequence modelling must be conducted, this is secured in Requirement 6 of the **Draft DCO [EN010158/APP/3.1.4].**

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			The risk of a thermal runaway event for Proposed Development has been determined to be a very small risk of occurring with a probability of approximately 1 in 5,804 years. The probability of another event on a neighbouring BESS site occurring simultaneously is therefore extremely unlikely. The BESS will have a robust and validated emergency plan, developed in consultation with Buckinghamshire and Milton Keynes Fire Authority (BMKFA). BMKFA is a statutory consultee for the Proposed Development and must approve the detailed Battery Safety Management Plan. Section 6.3.1 of the **Outline BSMP [EN010158/APP/7.9.3]** stipulates: *Prior to commencement of the construction of the BESS, an emergency response plan would be prepared by the Applicant in consultation with Buckinghamshire and Milton Keynes Fire Authority (BFA) and other relevant stakeholders. This would be maintained and reviewed regularly throughout the operating life of the BESS. The plan would be developed in accordance with NFCC guidance and other guidance and good practice in place at the time*. The Applicant will work closely with BMKFA to provide all relevant information on BESS and Site design features to inform all necessary hazard and risk analysis studies and assist in the development of comprehensive Risk Management Plan and Emergency Response Plan. Information will be supplied as early as possible in the detailed design stage to allow an initial appraisal of the BESS to be made. This information will be provided to BMKFA with appropriate evidence provided to support any claims made on performance, and with appropriate standards cited for installation. Such information should also be made available to BMKFA for inclusion in Site Specific Risk Information (SSRI) records.
4.3.4	REP1-159	**Biodiversity** Comment that the Applicant should demonstrate how it has considered cumulative effects on bats foraging along the Claydon Brook corridor.	The Applicant is fully aware that Claydon Brook and its tributaries provide important wildlife corridors, this is reflected within the assessment presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and also **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3],** which has assessment the potential cumulative inter-project impacts to both foraging and commuting bats along the Claydon Brook corridor that could occur. Accordingly, mitigation is proposed within Parcel 3 to protect and enhance this corridor. Perimeter fencing surrounding the Solar PV development will be offset at least 10m from the top of bank of Claydon Brook, extended to 20m in Fields E20, E11, E10 and the north section of Field E21. Within this buffer region, habitat creation is proposed that will retain vegetation connectivity, help to stabilise banks and help provide protection from pollution such as runoff. It will also maintain the vegetated watercourse corridor habitat for aquatic species, riparian mammals and foraging and commuting bats detailed within and secured by the **Outline LEMP [EN010158/APP/7.6.3]**.
4.3.5	REP1-159, REP1-172, REP1-217, REP1-250	**Biodiversity** Comment that the assessment of cumulative effects should consider loss of habitat for species including skylark, ground nesting birds and bats.	As detailed within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, RR-020 page 288 **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and** the **Outline LEMP [EN010158/APP/7.6.3]** outlines the suite of mitigation measures designed to benefit ground nesting birds. These measures would be secured by the **Outline LEMP [EN010158/APP/7.6.3]** along with a monitoring programme. Although there would be a temporary adverse effect on ground nesting birds, non-ground nesting birds and wintering birds during the construction phase from habitat loss and disturbance, this would be short-term and

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			temporary, at the Local level and not significant. The amount of habitat to be retained and improved is considered sufficient to support the existing ground nesting, non-ground nesting birds and wintering bird assemblages within the Order Limits. It is considered likely that birds would be able to use the improved habitat relatively quickly, once established, within the construction phase and through into the operation (including maintenance) phase. Therefore, any such inter-project cumulative effects are not considered to be significant. The Applicant has fully assessed cumulative impacts in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP6.2.3]** and highlights that 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. However, it has been further shown how this would be potentially significant at the District level and that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts would be of a scale that would not impact on the overall favourable conservation status of the species.
4.3.6	REP1-147 , REP1-156 , REP1-172, REP1-173, REP1-174, REP1-179, REP1-196, REP1-210, REP1-217, REP1-239, REP1-250, REP1-252, REP1-259, REP1-268, REP1-283, REP1-286, REP1-287, REP1-292	**Biodiversity** Comment that there has already been a negative effect on biodiversity from other infrastructure projects in the area and this would be exacerbated by the Proposed Development.	The Applicant has assessed cumulative effects, noting that a cumulative assessment can only be undertaken based on the information available with regards other development projects and is undertaken on a reasonable assumption that each development will provide sufficient mitigation to offset its own environmental impacts. The Applicant is confident that it can mitigate for its own impacts and as such the potential for residual impacts is further reduced.
4.3.7	REP1-188	**Consultation fatigue** Comment that local residents have been consulted on a barrage of planning applications in the last two years which has impacted on village life and peoples' time and ability to commit to opposing these applications.	The Applicant acknowledges that there are a number of applications in the area, and that over time some members of the community may feel fatigued and not wish to engage. To that end, (as set out in the **Consultation Report [EN010158/APP/5.1] [APP-020]**) the Applicant designed a multi-phase consultation programme which included a range of engagement techniques, materials that were available in different formats and at appropriate levels and that the consultations and opportunities to provide feedback were widely publicised. The Applicant also had dialogue with other project promoters in the area, such as Statkraft, Ministry of Defence and National Grid to ensure activity was coordinated and consultation periods did not overlap. The Applicant notes that the number of Interested Parties submitting a Relevant Representation (288) and WR (183) was higher than, or similar to, the number of individual responses received to the Phase Two Consultation (186), indicating a sustained level of engagement in the Application over time.
4.3.8	REP1-159	**Cultural heritage** Comment that the assessment of cumulative effects should consider effects on the setting of heritage assets.	The cumulative impact assessment within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** has considered effects resulting from changes to the setting of heritage assets. No significant cumulative effects have been identified.

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4.3.9	REP1-159	**Cultural heritage** Comment that the assessment of cumulative effects should consider potential harm to hidden heritage assets.	In regard to the National Grid East Claydon Substation (which is acknowledged within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**) there may be a cumulative impact on unknown assets with the Proposed Development due to the overlap of the Order Limits and the siting zone for the National Grid East Claydon Substation. It is considered unlikely, given the distances from the Order Limits, that there would be a cumulative impact with other developments and the Proposed Development. No cumulative physical impacts are therefore predicted. Due to the nature of hidden or currently unknown heritage assets it is not possible to ascertain their significance or how setting may contribute to this significance and therefore it is not possible to assess the cumulative effect on this significance.
4.3.10	REP1-218, REP1-300	**Cultural heritage** Comment that existing and planned projects would surround the Claydon villages which would negatively affect the cultural heritage of the villages.	The cumulative impact assessment within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** has considered effects to cultural heritage resulting from other developments around the villa. No significant cumulative effects have been identified.
4.3.11	REP1-196	**Dark skies** Comment that there will be a loss of dark skies from all of the planned developments.	Consideration has been given to minimising light spill. Throughout construction and operation, motion detection lighting or manually operated lighting would be used to avoid constant lighting. There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infrared which is not on the visible spectrum. Details of lighting design for the Proposed Development is detailed and secured in the **Design Commitments [EN010158/APP/5.9.4]** and **Outline CEMP [EN010158/APP/7.2.3].** Due to the minimal lighting that will be required for the construction, operation (including maintenance) and decommissioning of the Proposed Development, it is not anticipated that there would be any significant cumulative lighting effects.
4.3.12	REP1-120, REP1-137, REP1-143, REP1-144, REP1-145, REP1-146, REP1-147, REP1-150, REP1-152, REP1-162, REP1-167, REP1-169, REP1-175, REP1-178, REP1-172, REP1-183, REP1-187, REP1-189, REP1-191, REP1-195, REP1-199, REP1-202, REP1-208, REP1-212, REP1-214, REP1-217, REP1-223, REP1-225, REP1-234, REP1-237, REP1-246, REP1-247, REP1-253, REP1-257, REP1-258, REP1-261, REP1-262, REP1-263, REP1-264, REP1-269,	**General comment** Comment that the local area has already taken its fair share of infrastructure developments, including new energy infrastructure, HS2, EWR, new homes and the Grendon Prison.	While the Applicant acknowledges that this is an area subject to multiple large-scale developments, the assessment concludes, based on detailed topic-level evaluation, that no significant inter-project cumulative effects would arise, with the exception of potential impacts on landscape and visual, and Bechstein's bats. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** undertakes a comprehensive assessment of the cumulative context considering HS2, East West Rail, Grendon Prison and several housing and energy infrastructure projects within the 10km Zone of Influence.

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	REP1-272, REP1-274, REP1-276, REP1-278, REP1-281, REP1-182, REP1-283, REP1-287, REP1-288, REP1-289, REP1-293, REP1-298, REP1-299		
4.3.13	REP1-172, REP1-174, REP1-194	**General comment** Comment that Buckinghamshire Council has published its draft Local Plan showing that 438.82 hectares of land at Winslow is allocated to 6,811 new houses with a further 4,775 beyond the plan period (allocated sites: Winslow NW, Winslow NE, Land west of Furze Lane, Land south of Verney Road) and the cumulative effects on the local area are now wholly inappropriate.	These sites are not formally allocated by Buckinghamshire Council as the emerging Local Plan is in its draft stage. Furthermore, Buckinghamshire Council's emerging Local Plan webpages confirm that the sites mentioned are the result of refinement of the circa. 1,400 sites that Buckinghamshire Council received through their 'Call for Sites' exercise. 400 of these sites (which include the ones mentioned by the parties) progressed and recently underwent a further 'informal sites engagement' exercise which closed on 16 March 2026. This most-recent feedback is with Buckinghamshire Council to further refine where future development could take place. Resultingly, this may, or may not, see the sites quoted by the parties fall away as the emerging Local Plan advances. In the Proposed Development's case, Schedule 4 paragraph (5)(e) of the EIA Regulations notes the need for Environmental Statements to consider cumulative effects with other existing and/or approved projects. The aforementioned sites are yet (if they are deemed appropriate by Buckinghamshire Council) to be allocated. Were planning applications to come forward on these sites, the applicants/promoters of such development would need to consider the cumulative effects with the Proposed Development instead of this being the other way round.
4.3.14	REP1-159	**General comment** Comment that the Applicant has omitted a number of projects from its cumulative assessment which have been identified as relevant by Buckinghamshire Council including Tuckey Solar Farm, Fox Covert Solar Farm, Padbury Brook Solar Farm, Calvert Solar Farm, Longbreach Solar Farm, East Claydon Greener Grid Park, East Claydon BESS, HS2, EWR, Grendon Prison, replacement National Grid Substation.	Tuckey Solar Farm (Fox Covert Solar Farm), Padbury Brook Solar Farm, Calvert Solar Farm, Longbreach Solar Farm, East Claydon Greener Grid Park, East Claydon BESS, HS2, East West Rail, Grendon Prison and the replacement National Grid East Claydon Substation have all been considered within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** and form part of the short list of developments that have been assessed. The short list of developments has been discussed and agreed with Buckinghamshire Council as set out in **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2].**
4.3.15	REP1-182, REP1-247, REP1-253, REP1-274, REP1-279, REP1-293, REP1-300	**General comment** Comment that cumulative developments in and around the area should be considered as part of the decision on whether to grant consent for the Application.	An assessment of cumulative effects has been undertaken and is detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. It should be noted for the benefit of those making comment that the consideration of cumulative effects will be considered by the Examining Authority and the SoS when deciding on whether or not to grant the DCO Application. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** considers other developments within the 10km Zone of Influence from the Proposed Development that fall within the short list, which includes several projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms. The assessment concludes that there are likely significant inter-

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			project residual cumulative effects on landscape and visual and biodiversity following the implementation of embedded and additional mitigation measures. Notwithstanding this and as set out in section 10 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016],** 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.
4.3.16	REP1-254	**General comment** Comment that the cumulative impact of infrastructure projects on the character of the area, infrastructure and residents has not been adequately addressed.	An assessment of inter and intra-project cumulative effects has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** This chapter provides a detailed cumulative assessment on Population (including tourism, users of PRoW, local business and residents) and Landscape and Visual (including landscape character). The cumulative assessment concluded that there would be cumulative impacts on several landscape and visual receptors due to an increase in significant effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill and Station House during operation (including maintenance) (Year 1 and Year 10); on the residents of Granborough during construction, operation (including maintenance) (Year 1); and for significant effects to extend for the full duration of operation from the North Buckinghamshire Way and The Midshires Way. Of these significant cumulative effects, only those for the North Buckinghamshire Way and The Midshires Way would be sequential. It is considered that these cumulative effects would extend to a defined area, no more than approximately 2km beyond the Order Limits to the southeast of Parcel 2, which would not amount to 'impacts across the district'. The Applicant therefore maintains that the potential cumulative impacts are not atypical considering the scale of the Proposed Development.
4.3.17	REP1-263	**Glint and glare** Comment that cumulative glint and glare effects have not been considered.	All areas dedicated to Solar PV modules have been included in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]**. The assessment has studied potential glint and glare effects to nearby building and road receptors, located within a 1km study area from these reflective modules, have been considered. For buildings, the approach was to consider all habitable buildings that show a potential view of the Solar PV modules. Where there is a cluster of buildings, only a selection of them with the highest potential to be affected by glint and glare are assessed as representative of the rest, as the impacts will be similar. Local roads with very low traffic are excluded from the analyses, as the potential glint and glare impacts are considered to be very low and not significant. The analyses have found no significant adverse effects on nearby roads or buildings. All Solar PV modules will have an anti-reflective coating which will reduce the potential for glint and glare. This is set out and secured within Design Commitment D9 of the **Design Commitments [EN010158/APP/5.9.4].**
4.3.18	REP1-143, REP1-217	**Health and wellbeing** Comment that there have been negative effects on mental health and wellbeing due to the amount of infrastructure projects in the area, with specific	Mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – it is acknowledged that mental health can be subjective and experienced individually with sensitivity to change varying across populations, sub-populations and individuals.

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		references made to stress during the construction phases and overall change in landscape character.	Mental health effects have been considered in accordance with guidance produced by ISEP, and are specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** which concludes that the overarching view based on the above – and in the context of concerns about the assessment of effects on mental health and wellbeing – is that: • Engagement has been undertaken via the pre-application statutory, non-statutory consultation and bilateral and community engagement processes set out within the Appendices to the **Consultation Report [EN010158/APP/5.1] [APP-020]** that have provided adequate provision of information and consideration of community and stakeholder feedback in the approach to design and assessment; • Key environmental assessments relating to the potential for effects on mental health have been undertaken (for example relating to noise and air quality), and effects mitigated where practicable to result in no significant adverse residual effects at a population scale (noting that in some instances localised landscape and visual effects which may influence health would be significant for some sub-populations and receptors); and • Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing. One very important aspect – as identified by ISEP – that can help to address the potential for adverse mental health effects is to ensure clear, transparent and accessible information about the Proposed Development, and feedback channels to ensure agency for local people in monitoring and influencing the approach to mitigation for a project. Details of this approach are included within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** at Annex A (Health Effects Report), Section 3. Mental health and wellbeing is individual, subjective and experienced through a range of external factors beyond the Applicant's control. The Applicant considers that the approach taken to provide information and engage and consult, clearly and transparently assess and mitigate significant environmental effects (where practicable) and secure enhancement measures demonstrates that appropriate measures have been taken to address potential effects on mental health and wellbeing.
4.3.19	REP1-174, REP1-210, REP1-234, REP1-289	**Soil and Land and groundwater** Comment that there will be a cumulative loss of agricultural land which should be considered.	A cumulative assessment for soils and agriculture has been undertaken which considers projects within 1km from the Site as detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** No significant cumulative effect on agricultural land was found and, noting that only 1.51% of the Site is considered to be BMV land, further assessment was not considered necessary.
4.3.20	REP1-159, REP1-268,	**Landscape and visual** Comment that the assessment of cumulative effects should consider the loss of open landscape.	An assessment of inter and intra-project cumulative effects has been undertaken and is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. The assessment has taken into account the loss of open agricultural fields, and, where relevant, the commensurate loss of views to the wider landscape. As a result of changes to within the landscape, there would be increased combined effects on Landscape Character Area 5.6: Claydon Valley, Landscape Character Area 5.7: Hogshaw Claylands and the Quainton-Wing Hills Area of Attractive

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Landscape, albeit with no change to overall significance. The LVIA has concluded that there is potential for an increase in significant landscape effects to only Landscape Character Area 9.2: Quainton Hill as a result of combined effects.
4.3.21	REP1-144, REP1-146, REP1-155, REP1-179, REP1-189, REP1-193, REP1-196, REP1-210, REP1-213, REP1-217, REP1-225, REP1-234, REP1-251, REP1-242, REP1-257, REP1-259, REP1-262, REP1-265, REP1-266, REP1-279	**Landscape and visual** Comment that the amount of infrastructure projects in the local area would change the character of the local landscape.	As noted in **Ref. 4.3.20** above, the Applicant has acknowledged that there is potential for an increase in significant landscape effects to LCA 9.2: Quainton Hill. However, these effects would extend no more than 2km beyond the Order Limits which would not be atypical considering the scale of the Proposed Development.
4.3.22	REP1-211, REP1-218, REP1-257, REP1-300	**Landscape and visual** Comment that existing and planned projects would surround the Claydon villages which would negatively affect the character of these villages.	As noted on page 32 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** Buckinghamshire Council agreed that both Middle Claydon and East Claydon could be scoped out of the assessment on the basis they would not experience likely significant effects. The potential cumulative effects on Botolph Claydon have been considered when designing the Proposed Development. The fields closest to Botolph Claydon were removed from the Order Limits following Stage One Consultation, as described in the **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018]. As set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** there would be no increased combined effects on residents of Botolph Claydon. It is noted, however, that the users of the PRoW network between Granborough and East Claydon would experience increased significant cumulative effects prior to mitigation planting reducing effects to not significant by year 10 of the Proposed Development.
4.3.23	REP1-159, REP1-186	**Lighting** Comment that the assessment of cumulative effects should consider light pollution.	Consideration has been given to minimising light spill. Throughout construction and operation, motion detection lighting or manually operated lighting would be used to avoid constant lighting. There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infrared which is not on the visible spectrum. Details of lighting design for the Proposed Development is detailed and secured in the **Design Commitments [EN010158/APP/5.9.4]** and **Outline CEMP [EN010158/APP/7.2.3].** Due to the minimal lighting that will be required for the construction, operation (including maintenance) and decommissioning of the Proposed Development, it is not anticipated that there would be any significant cumulative lighting effects.
4.3.24	REP1-159, REP1-217, REP1-237, REP1-239, REP1-282, REP1-284	**Noise** Comment that the Applicant has not appropriately assessed cumulative noise impacts.	Cumulative noise effects are considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**, which includes the noise contribution of other developments in the surrounding area. No significant noise effects are predicted.
4.3.25	REP1-191	**Population**	Cumulative effects on the agricultural economy have been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This sets out that the cumulative

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Comment that the amount of infrastructure projects in the local area means that local farmers are being repeatedly displaced with no alternative land available.	developments account for only 2% of the indicative agricultural employment capacity in agriculture in Buckinghamshire. In terms of specific receptors for the Proposed Development, while temporarily reducing employment capacity – the Proposed Development is not likely to actually result in a substantial loss of employment as jobs supported by the owners, tenants and operators of agricultural land would be moved to other landholdings held by the Claydon Estate via a land swap or through agreement of compensation.
4.3.26	REP1-152, REP1-159	**Population** Comment that the Applicant has not appropriately assessed cumulative impacts on local businesses, including agricultural businesses.	As per **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**, the cumulative impact assessment for socio-economic effects is based on a different approach from other disciplines of the ES, in that it utilises broader "macro" projections of cumulative influences relevant to particular potential effects (e.g. effects on local and regional labour market), rather than focusing on potential cumulative effects of specific developments on individual receptors. Cumulative effects from environmental aspects that may have the potential to result in change to the viability of agricultural businesses and landholdings, other rural land-based businesses and commercial activity are anticipated to be not significant, localised and would be unlikely to affect the viability of the activity. No individual landholdings or tenancies are likely to be affected by cumulative schemes in addition to the Proposed Development in terms of land-take. As such, cumulative effects are considered to be of no greater significance than for the Proposed Development in isolation.
4.3.27	REP1-120, REP1-169, REP1-175, REP1-217, REP1-234, REP1-252, REP1-264, REP1-276, REP1-291	**Population** Comment that the amount of infrastructure projects in the local area has put a disproportionate burden on local communities.	The assessment at **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** recognises that there are several infrastructure projects within the local area and assesses the environmental effects on communities in terms of the experience of changes that affect access, recreation, environmental amenity and socio-economics. While it is recognised that there is a concentration of major infrastructure activity in the area, each project has developed compliant and best-practice environmental design and mitigation strategies to address the potential for significant adverse effects where practicable.
4.3.28	REP1-159, REP1-221	**Population** Comment that the assessment of cumulative effects should consider disruption to local businesses and services. Specific references made to TCS Biosciences Ltd and GP surgeries.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** considers the potential for environmental effects on individual sensitive receptors (including TCS Biosciences and community facilities such as GP surgeries) concluding that given the localised nature of the facilities, the embedded and additional mitigation in place, that cumulative environmental effects with the potential to affect their viability (such as changes in access, air quality, land and noise) are not considered to be significant.
4.3.29	REP1-159	**Population** Comment that the assessment of cumulative effects should consider the loss of a skilled, local workforce.	Cumulative effects on employment have been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This sets out that the cumulative developments account for only 2% of the indicative agricultural employment capacity in agriculture in Buckinghamshire.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			In terms of specific receptors for the Proposed Development, **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 indicative capacity for up to around 10 FTE jobs"* (emphasis added). It is further noted, to contextualise this, that (paragraph 14.8.20) "*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*". Additionally – the Proposed Development would support the provision of long-term employment. It is estimated that the operation (including maintenance) phase would support around 24 FTE jobs, with additional staff attending when required for maintenance, replacement of faulty or end of service life solar equipment, vegetation management activities and cleaning. The employment supported would include electrical engineering roles likely to require higher level skills and qualifications, as well as site management, administrative and process/elementary occupations including security and maintenance.
4.3.30	REP1-159, REP1-207, REP1-210, REP1-282	**Public Right of Way and permissive footpath** Comment that the assessment of cumulative effects should consider the loss of recreational amenity of PRoW and footpaths.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044]** considers the intra-project combined likely residual effects and inter-project cumulative effects of the Proposed Development and other developments on residential amenity and PRoW. The cumulative assessment concluded that there would be potential for significant effects on users of the PRoW network between Granborough and East Claydon during construction and operation (Year 1) and for the full duration of operation from the North Buckinghamshire Way/Midshires Way to approximately 2km to the southeast of Parcel 2. The Applicant therefore maintains that the potential cumulative impacts are not atypical considering the scale of the Proposed Development.
4.3.31	REP1-159, REP1-168	**Transport and access** Comment that the Applicant has not considered the effect of AIL deliveries from the Proposed Development alongside construction traffic from the replacement National Grid Substation, Statera BESS and Statkraft BESS through Winslow.	AIL traffic must be escorted by the Police as required by law. This ensures that only one AIL movement can occur at any one time, ensuring that there are no cumulative impacts with other schemes. The detailed Construction Traffic Management Plan, based upon **Outline CTMP [EN010158/APP/7.5.3]** will address any further AIL cumulative measures that may occur, should project timescales result in AIL movements occurring in similar timescales.
4.3.32	REP1-214	**Transport and access** Comment that the requirement to replace the National Grid Substation in combination with the Proposed Development will cause unacceptable levels of construction traffic and workers vehicles passing through local villages and Winslow.	Only a small number of AIL movements are proposed to pass through Winslow as noted in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** No other construction traffic associated with the Site is proposed to pass through Winslow, ensuring a minimal impact in the town.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
4.3.33	REP1-159, REP1-220	**Transport and access** Comment that the assessment of cumulative effects should consider traffic disruption and road safety for non-motorised users.	These matters are already considered in the assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044].** No significant effects following mitigation are predicted.
4.3.34	REP1-120, REP1-143, REP1-146, REP1-147, REP1-151, REP1-152, REP1-155, REP1-156, REP1-158, REP1-161, REP1-168, REP1-169, REP1-173, REP1-174, REP1-179, REP1-183, REP1-185, REP1-186, REP1-188, REP1-195, REP1-200, REP1-201, REP1-208, REP1-214, REP1-217, REP1-218, REP1-219, REP1-220, REP1-221, REP1-224, REP1-225, REP1-226, REP1-229, REP1-230, REP1-237, REP1-239, REP1-241, REP1-242, REP1-244, REP1-247, REP1-249, REP1-250, REP1-251, REP1-252, REP1-253, REP1-255, REP1-256, REP1-257, REP1-261, REP1-262, REP1-265, REP1-266, REP1-267, REP1-269, REP1-271, REP1-273, REP1-275, REP1-282, REP1-287, REP1-288, REP1-293, REP1-294, REP1-299, REP1-300,	**Transport and access** Comment that the local area has experienced significant disruption and damage because of other infrastructure projects being built in the area and this would be exacerbated by the Proposed Development.	All committed developments have been considered in the transport reviews provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044].** The traffic effects of the Proposed Development are temporary and not significant in all cumulative scenarios modelled. As such, the disruption to the road users is not significant and will not adversely affect access.
4.3.35	REP1-159	**Water** Comment that the Applicant has not assessed cumulative effects on flood risk, with specific reference to cumulative effects of the Statera BESS and National Grid substation developments which have not been factored into the Applicant's analysis.	Planning policy states that development must be designed so it is safe and does not increase flood risk elsewhere. Where this is achieved through measures such as SuDS, attenuation, and limiting discharge to greenfield rates, there should be no increase in flood risk, either on its own or in combination with other schemes. The Proposed Development has been designed on this basis with no off-site impacts. The East Claydon BESS and National Grid East Claydon Substation projects would be required to follow the same approach. As a result, provided each scheme complies with policy, cumulative flood risk effects are not expected to arise.

Table 5-1: Health and Wellbeing (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Assessment Methodology and Adequacy	
5.1.1	CSAG Appendix (Pages 21 – 28)	Appendix 'the local determinants affecting health of local population from proposed rosefield solar farm' included within the WR. In summary, this Appendix describes how it is considered that the Proposed Development, together with other cumulative projects, would make for the 'perfect storm' of transport disruption and that this would disrupt the provision of emergency services and a transport-dependant rural population. The Appendix calls for a comprehensive Health Impact Assessment (which includes traffic considerations, emergency vehicle routing, access to surgeries, pharmacies and health care, and an assessment of vulnerable patients).	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058] and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]**.** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction traffic effects of the Proposed Development are temporary and not significant in EIA terms. As such, disruption to road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care. A comprehensive assessment of health and wellbeing effects related to the Proposed Development (including a consideration of cumulative effects) has been included within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** (including a Health Effects Report at Annex A) submitted at Deadline 1, which aims to clearly present the effects on health and wellbeing in accordance with NPS EN-1 (2023), NPS EN-3 (2023) and guidance produced by ISEP. In terms of the potential relevant impact of traffic and access effects on health pathways, Section 8.4 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) considers potential cumulative effects on health driven by determinants of health relating to transport and access - severance, pedestrian delay and Walking, Cycling and Horse rider (WCH) user amenity, fear and intimidation, accidents and road safety from traffic associated with the construction and operation (including maintenance) phases. This concludes that the Proposed Development and the cumulative schemes are not considered to result in additive effects that would combine to increase the level of effect on individual receptors to a significant scale across most relevant determinants of health. Furthermore, where practicable the Applicant has committed to management plans and embedded mitigation measures that represent best practice and, in most cases, inherently consider thresholds that are determined by the potential for effects on health and wellbeing. The information contained within the documents produced by CSAG **[**REP1-127**]** has been helpful in providing additional context for the portion of the population assessed that is registered with a GP at the 3W Health practice, noting that: • The villages affected include an ageing demographic, with higher levels of chronic disease, mobility limitations, and reliance on local GP and community services; • Such populations – and populations in rural areas more generally - are more sensitive to changes in access to local primary care as they may rely on private transport (including provided by friends and family) to access healthcare and community services; and • Older sub-populations are more likely to experience barriers to access for public healthcare and social isolation, higher rates of dependency and disability, and higher prevalence of some major disease/health conditions including respiratory disease. 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

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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. The Health Effects Report has been updated accordingly and re-submitted at Deadline 2 to account for this helpful information 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.

Table 5-2: Health and Wellbeing (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Assessment Methodology and Adequacy	
5.2.1	Waddesdon Surgery (Para. 5)	Comment noting that the statement made within the Population Chapter of the ES underestimate's the Proposed Development's impact on local businesses which the Applicant has noted in response that *"in each case, non-significant effects are reported except for landscape and visual amenity effects which would be of moderate adverse significance for two businesses only, following the application of design measures and mitigation. However, given the diversity of offer and the nature of the commercial activity, this change is not anticipated to affect the viability of the business"*.	The assessment within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** draws on information and assessments from across the ES to consider the likelihood of significant adverse effects on any human receptor, including businesses, and consider whether such environmental or access changes may translate into effects on business viability. The comment raised appears to specifically relate to the potential for changes in access to the business in question (Waddesdon Surgery). The Applicant has prepared a detailed review of construction phase traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
		Significance of Effects	
5.2.2	Waddesdon Surgery (Para. 1)	Comment that ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement does not present a true evaluation of the physical and mental impacts of the Proposed Development on people.	A comprehensive assessment of health and wellbeing effects related to the Proposed Development – including a consideration of cumulative effects – has been included within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** (including a Health Effects Report at Annex A) submitted at Deadline 1 (and updated at Deadline 2), which aims to clearly present the effects on health and wellbeing in accordance with NPS EN-1 (2023), NPS EN-3 (2023) and guidance produced by ISEP. The approach taken to consideration of effects on physical and mental health and wellbeing is in accordance with standard guidance for such an assessment produced by ISEP.
5.2.3	Waddesdon Surgery (Para. 1)	Comment noting construction phase disruption and impact on infrastructure with regard for resident access and community nursing and the provision of health services. Further comment noting the regular need to visit patients at their homes.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
5.2.4	Waddesdon Surgery (Para. 4)	Comment noting severe mental health impacts as a result of potential business closures and impacts on day to day living as a result of the Proposed Development.	A comprehensive assessment of health and wellbeing effects related to the Proposed Development – including a consideration of cumulative effects – has been included within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** (including a Health Effects Report at Annex A) submitted at Deadline 1, which aims to clearly

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Further comment that the Proposed Development will impact upon people's ability to enjoy the physical benefits of the countryside.	present the effects on health and wellbeing in accordance with NPS EN-1 (2023), NPS EN-3 (2023) and guidance produced by ISEP. Mental health effects have been considered in accordance with guidance produced by ISEP, and are specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** which concludes that the overarching view based on the above – and in the context of concerns about the assessment of effects on mental health and wellbeing – is that: • Engagement has been undertaken via the pre-application statutory, non-statutory consultation and bilateral and community engagement processes set out within the Appendices to the **Consultation Report [EN010158/APP/5.1] [APP-020]** that have provided adequate provision of information and consideration of community and stakeholder feedback in the approach to design and assessment; • Key environmental assessments relating to the potential for effects on mental health have been undertaken (for example relating to noise and air quality), and effects mitigated where practicable to result in no significant adverse residual effects at a population scale (noting that in some instances localised landscape and visual effects which may influence health would be significant for some sub-populations and receptors); and • Enhancements have been provided to the long-term accessibility of the area through the commitment to permissive paths and improvements to PRoW in order to promote and enhance physical and mental wellbeing. While mental health and wellbeing is individual, subjective and experienced through a range of external factors beyond the Applicant's control, the Applicant considers that the approach taken to provide information and engage and consult, clearly and transparently assess and mitigate significant environmental effects (where practicable) and secure enhancement measures demonstrates that appropriate measures have been taken to address potential effects on mental health and wellbeing. The importance of access to the natural environment for physical recreation is acknowledged in the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** at Section 5.3 (specifically in terms of mental health effects) and Section 3.6 (in terms of both physical and mental health effects).
5.2.5	Waddesdon Surgery (Para. 4)	Comment that the effects of HS2 have shown in multiple instances of severe and long-term mental health impacts on patients within the area.	As set out under **Ref. 5.2.4**, mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3].** It is acknowledged that the community in this area has experienced substantial change and development of nationally significant infrastructure in the period preceding the making of the DCO Application for the Proposed Development – for example given the close proximity to HS2 works, which while not accounted for within the standard cumulative effects assessment methodology, is likely to have influenced the prevailing sensitivity to change and would therefore influence health and wellbeing effects experienced as a result of the Proposed Development more acutely than if the community had not had recent and long-term exposure to such works. It is not possible to accurately quantify the additional sensitivity against existing guidance, as there is no defined baseline data (except for assertion provided through stakeholder comments) that identifies the location or extent of the sub-

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			population affected, but account has been taken at a population scale that has contributed to the definition of sensitivity qualitatively.
5.2.6	East Claydon Parish Council (Page 1, Para. 4)	Comment noting that some senior residents are depressed and distraught at the prospect of continuing major local infrastructure construction potentially outliving them.	The **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** acknowledges that some sub-populations (including older people) are more likely to experience more acute sensitivity to change to their health and wellbeing as a result of the Proposed Development. One particularly important aspect – as identified by ISEP – that can help to address the potential for adverse mental health effects is to ensure clear, transparent and accessible information about the Proposed Development, and feedback channels to ensure agency for local people in monitoring and influencing the approach to mitigation for a project. Details of this approach are included within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** at Annex A (Health Effects Report), Section 3.

Table 5-3: Health and Wellbeing (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Assessment Methodology and Adequacy	
5.3.1	REP1-159	**TCS Biosciences Ltd** Comment that appropriate assessment of potential impacts from the Proposed Development on businesses of critical importance to public health nationally, as well as the national and local economies, is central to the determination of this application.	The Applicant has responded to the question of whether the potential impact on TCS Biosciences Ltd (and the NHS) fall under the exceptions to CNP as described at paragraph 4.2.15 of National Policy Statement (NPS) EN-1 as an 'unacceptable risk to, or unacceptable interference with, human health and public safety' in response to Q1.17.1 within the **Applicant's Responses to the Examining Authority's First Written Questions (ExQ1) [EN010158/APP/8.13].** The Applicant recognises the importance of the operation undertaken by TCS Biosciences, and has taken advice from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses, which is reported in the ES. In order to limit disruption to land used by TCS Biosciences, based on this organisation's feedback the Applicant has made several changes to the Proposed Development and mitigation to be secured within management plans. This is set out in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** (from paragraph 1.2.4 of Appendix 1) and includes but is not limited to: • Removed the option consulted on previously for a substation 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 TCS Biosciences sheep and/or horses to cross the field to access their other adjacent grazing fields. 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. Corridors will be at least 20m wide. As indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, a number of the outline management plans were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on TCS Biosciences. In order to address concerns raised in the WR received from Preston Farms Limited and TCS Biosciences Ltd **[REP1-133]**, a **Noise and Vibration Technical Study (Annex A** to **Appendix 1** to this document) has been submitted to the examination 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.

Ref	WR	Summary Position	Applicant's Response
			A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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. Engagement with Prestons Farm and TCS Biosciences is ongoing in order to seek to review and amend the approach to managing the effects of the Proposed Development where practicable.
		Other matters	
5.3.2	REP1-268	**Air pollution** Comment that air pollution from the Proposed Development would have a negative impact on the mental and physical health of the local community.	Section 3.3 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** and Section 7.1 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) set out the potential for changes in air quality to affect health and wellbeing, including a summary of the approach to embedded and additional mitigation. These documents summarise that, when adopting best practice mitigation measures and in the context of legal standards and thresholds across all receptor types and locations assessed, the Proposed Development would not lead to changes in air quality with the potential to affect human health. In addition, following iterative preliminary assessment, a suite of additional mitigation measures has also been secured and these aim to address the potential for both physical and mental health effects to occur, through a combination of 'plan-monitor-manage' measures. This includes monitoring and the delivery of remedial actions, an approach to community engagement, feedback and scrutiny.
5.3.3	REP1-182, REP1-197, REP1-228	**Biodiversity** Comment that loss of biodiversity would have a negative effect on wellbeing.	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** shows that the Proposed Development would deliver a significant positive net gain for biodiversity. The habitat creation and enhancement proposals and long-term management are outlined in the **Outline LEMP [EN010158/APP/7.6.3]**. These measures are considered to secure important enhancement measures relevant to positive health pathways, including the provision of new permissive footpaths and increased accessibility, opportunities for recreation in the natural environment, and environmental improvements.
5.3.4	REP1-164, REP1-183, REP1-188, REP1-211, REP1-212, REP1-217, REP1-222, REP1-259, REP1-278, REP1-281, REP1-282, REP1-284, REP1-299,	**Mental health** Comment that there would be a negative effect on mental health and wellbeing during the construction phase of the Proposed Development due to disruption and noise.	Section 3.4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** and Section 7.2 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) set out the potential for changes in noise and vibration to affect health and wellbeing during the construction phase, including a summary of the approach to embedded and additional mitigation. This technical assessment summarises that noise levels would comply with Planning Practice Guidance, WHO guidelines and legal thresholds, and therefore would not be expected to lead to detrimental effects on human health. However, effects below the threshold may be significant where there is the potential for noise to occur without the ability for a community to access information about the source and scale of the noise – as such, clear communication and a commitment to monitoring and the articulation of

Ref	WR	Summary Position	Applicant's Response
			monitoring is considered essential to avoid adverse effects on health and wellbeing, and this has been factored into management plans following engagement with Environmental Health Officers at Buckinghamshire Council.
5.3.5	REP1-229	**Mental health** Comment that the Proposed Development is already having a negative mental health impact due to anxiety about the proposals.	It is recognised that effects on mental health and wellbeing can be influenced by a lack of awareness or information about a project and planned construction activities; people can feel they do not have a voice or lack control over how to raise issues and concerns they may have. As such, in the context of mental health and wellbeing, it is important to confirm the extent to which stakeholders and communities have been included in – and will continue to be important part of – engagement, project development and design evolution. Mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – it is acknowledged that mental health can be subjective and experienced individually with sensitivity to change varying across populations, sub-populations and individuals. Engagement, project design and the development of additional mitigation have been progressed iteratively during the pre-application phase have sought to address the prevailing concern and anxiety experienced by communities, and a summary of this is set out in Section 5.2 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** and further developed in Section 3 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**).
5.3.6	REP1-120, REP1-141, REP1-143, REP1-145, REP1-146, REP1-152, REP1-154, REP1-165, REP1-168, REP1-170, REP1-177, REP1-180, REP1-181, REP1-189, REP1-196, REP1-207, REP1-209, REP1-211, REP1-214, REP1-217, REP1-222, REP1-225, REP1-228, REP1-229, REP1-230, REP1-233, REP1-234, REP1-236, REP1-247, REP1-248, REP1-253, REP1-266, REP1-268, REP1-271, REP1-279, REP1-288, REP1-293	**Mental health** Comment that there would be a negative effect on mental health and wellbeing as a result of the loss of access to countryside, loss of sense of place.	As set out in the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing. In particular, 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 community access. Mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – it is acknowledged that mental health can be subjective and experienced individually with sensitivity to change varying across populations, sub-populations and individuals. In terms of health and wellbeing pathways (including access to the natural environment for active recreation), it is noted that users of PRoW are likely to experience in-combination effects as a result of the experience of multiple types of environmental change. It is recognised that the experience of the natural environment through recreational and other use of PRoW is an important aspect contributing to mental and physical health and wellbeing. Engagement and consultation has confirmed the Applicant's understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operation (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or

Ref	WR	Summary Position	Applicant's Response
			reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing. Access to the natural environment, social mobility and sense of place are important to the consideration of mental health and wellbeing effects. These are considered within Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**, but are also set out in the context of changes to the landscape and visual environment (Section 7.3) and changes to traffic, transport and access (including access to the natural environment for active recreation (Section 7.4) within the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]).**
5.3.7	REP1-300	**Mental health** Comment that the visual impact of the project from residential properties would affect wellbeing.	Mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – it is acknowledged that mental health can be subjective and experienced individually with sensitivity to change varying across populations, sub-populations and individuals. **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** assesses potential effects on residential properties (i.e. private views) in terms of 'residential amenity', which are summarised in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** The assessment suggests that residents of 4-5 Catherine Cottages and 6-7 Catherine Cottages would experience significant visual effects during Year 1 of the operation (including maintenance) phase. Due to the ongoing establishment of mitigation, these effects would reduce in magnitude by Year 10 of the operation (including maintenance) phase and would not be significant. Only residents of dwellings at Bernwood Farm and Sion Hill Farm would experience significant visual effects during both year 1 and 10 of operation (including maintenance) phase. The assessment concludes that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development.
5.3.8	REP1-282, REP1-286	**Mental health** Comment expressing concern about mental health impacts on tenants and agricultural workers.	Mental and physical health effects on agricultural tenants and workers have been considered within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3].** The assessment acknowledges (at Section 3.7) that research published by the UK Parliament considers that farmers and agricultural workers are at a particular high risk of mental health illness and suicide, and that particular drivers of the mental health problems for agricultural workers include working long hours, living at work, family pressures, poor physical health and agricultural crime. Agricultural work and farming cultures can also bring about the problem of social isolation, caused by lone-working in isolated rural areas and the constant need to be available. As such, agricultural tenants and their employees are considered sensitive receptors to changes in the socio-economic environment, with clear pathways and determinants to health effects identified.

Ref	WR	Summary Position	Applicant's Response
			The Applicant has taken a detailed approach to addressing effects on the existing agricultural tenants – providing for compensation, mitigation and land-swaps to ensure where practicable the ongoing security and continuity of the operations.
5.3.9	REP1-155, REP1-268, REP1-282, REP1-284	**Noise** Comment that noise from the Proposed Development would have a negative impact on the mental and physical health of the local community. Specific reference made to older residents.	Section 3.4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** and Section 7.2 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) set out the potential for changes in noise and vibration to affect health and wellbeing, including a summary of the approach to embedded and additional mitigation. This technical assessment summarises that noise levels would comply with Planning Practice Guidance, WHO guidelines and legal thresholds, and therefore would not be expected to lead to detrimental effects on human health. However, effects below the threshold may be significant where there is the potential for noise to occur without the ability for a community to access information about the source and scale of the noise – as such, clear communication and a commitment to monitoring and the articulation of monitoring is considered essential to avoid adverse effects on health and wellbeing, and this has been factored into management plans following engagement with Environmental Health Officers at Buckinghamshire Council.
5.3.10	REP1-300	**Noise** Comment that the noise during construction and operation heard in residential properties would affect wellbeing.	Section 3.4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** and Section 7.2 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) set out the potential for changes in noise and vibration to affect health and wellbeing, including a summary of the approach to embedded and additional mitigation. This technical assessment summarises that noise levels would comply with Planning Practice Guidance, WHO guidelines and legal thresholds, and therefore would not be expected to lead to detrimental effects on human health. However, effects below the threshold may be significant where there is the potential for noise to occur without the ability for a community to access information about the source and scale of the noise – as such, clear communication and a commitment to monitoring and the articulation of monitoring is considered essential to avoid adverse effects on health and wellbeing, and this has been factored into the **Outline CEMP [EN010158/APP/7.2.3]** following engagement with Environmental Health Officers at Buckinghamshire Council.
5.3.11	REP1-146, REP1-168, REP1-228, REP1-234, REP1-247, REP1-253, REP1-268, REP1-293	**Physical health** Comment that there would be a negative effect on physical health as a result of the loss of PRoW and permissive footpaths.	As set out in the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing. In particular, 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 community access. Mental health effects have been considered in accordance with guidance produced by ISEP, and specifically referenced at Section 5 of **ES Volume 4, Appendix 5.5: Health and Wellbeing**

Ref	WR	Summary Position	Applicant's Response
			Summary Statement [EN010158/APP/6.4.3] – it is acknowledged that mental health can be subjective and experienced individually with sensitivity to change varying across populations, sub-populations and individuals. In terms of health and wellbeing pathways (including access to the natural environment for active recreation), it is noted that users of PRoW are likely to experience in-combination effects as a result of the experience of multiple types of environmental change. It is recognised that experience of the natural environment through recreational and other use of PRoW is an important aspect contributing to mental and physical health and wellbeing. Engagement and consultation has confirmed the understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operation (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing. Access to the natural environment, social mobility and sense of place are important to the consideration of mental health and wellbeing effects. These are considered within Section 5, but are also set out in the context of changes to the landscape and visual environment (Section 7.3) and changes to traffic, transport and access (including access to the natural environment for active recreation (Section 7.4) within the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]).**
5.3.12	REP1-159	**TCS Biosciences Ltd** Comment that disruption to the activities of TCS Biosciences Ltd risks the prompt diagnosis of bacterial and fungal infections in the health services.	The Applicant has set out its position regarding the potential effects on and mitigation for impacts related to disruption to TCS Biosciences Ltd under **Ref. 5.3.1** in this table.

Table 6-1: Land and Groundwater (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Other matters	
6.1.1	REP1-137, REP1-154, REP1-168, REP1-177, REP1-178, REP1-193, REP1-209, REP1-210, REP1-214, REP1-216, REP1-226, REP1-227, REP1-229, REP1-232,	**Ground contamination** Comment that there would be ground contamination from the BESS. Specific comments raised that water run-off from firefighting would cause groundwater pollution.	The **Outline BSMP [EN010158/APP/7.9.3]** outlines clear mitigation measures in the event of BESS thermal runaway event. This management plan ensures environmental protections are 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 is secured 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. The Applicant has assessed the potential for ground contamination to be caused by the BESS within the assessment of potential effects on land and groundwater receptors within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]**. The assessment considered the events or actions which could result in release of contamination (including the potential release of fire-fighting water), and the assessment provides details of the mitigation measures that will be in place to ensure any such impacts are minimised. The assessment concludes that there is no residual significant risk, after the appropriate mitigation measures are in place. The mitigation measures are incorporated into the appropriate documents, as detailed below: • **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 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 Drainage Strategy [EN010158/APP/7.11.3]** (see Section 6.1.4 on page 11, Section 6.5.2 on page 12 and Section 6.7 on page 13). For further 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) in **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. In addition, the Applicant amended **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** at Deadline 1 to ensure that there is specific mention of this issue in respect of the operation (including maintenance) phase of the Proposed Development (with the topic already being sufficiently covered within the decommissioning section of the Chapter).

Ref	WR	Summary Position	Applicant's Response
6.1.2	REP1-159, REP1-239, REP1-284	**Firefighting water** Comment that there is a high risk of pollution in the event of a battery fire due to the BESS' proximity to a watercourse.	The potential for pollution to be released from the BESS following a battery fire is assessed within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]**. The assessment considers the potential for release of contamination after a battery fire, and provides detail of the mitigation measures that will be in place to ensure that any such impacts are minimised. The assessment concludes that there are no residual significant risks , after appropriate mitigation measures have been implemented. Further information relating to this matter is provided in **Ref. 6.1.1**, which also considers impacts from firefighting water. As set out in the **Outline BSMP [EN010158/APP/7.9.3]**, the BESS drainage system would be designed to isolate and contain such flows to prevent pollution of the surrounding environment. This is anticipated to be achieved using a permeable surface around the battery unit areas, which is underlain by an aggregate subbase lined with an impermeable membrane or a functionally equivalent alternative. Outfalls from the BESS surface water drainage system would have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal. These would be subject to regular maintenance. Following a fire event, retained water would be tested by the Operator. If contaminated (polluted), the water would be removed from Site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential source of firefighting water by re-filling the water tanks. This approach ensures that environmental protection is maintained under both normal and emergency conditions. The tanks would be maintained and cleaned at regular intervals with any silt collected also tested and transported off-site if required. Following a fire event, the aggregate subbase would be evaluated for contamination and reinstated to maintain the integrity of the Site's drainage infrastructure. In the event of a fire, the gravel proposed for use as the sub-base of the BESS compound must be tested and replaced if found to be contaminated. UK accredited labs would be used for water testing. The entire filter drainage network, including catchpits and manholes, would be restored. An example approach to firewater drainage may be underground attenuation tanks, which would likely fill up with the potentially polluted water and would also be reinstated, where required. All contaminated materials would be disposed of safely by a licensed waste carrier. More detailed methodology would be determined at detailed design stage. Measures would be taken to ensure sufficient storage capacity is provided to accommodate rainfall volumes after firefighting activities and prior to the resumption of drainage discharge.

Table 7-1: Landscape and Visual (including Design) (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Landscape Character	
7.1.1	CSAG (Page 8, Para. 28)	Comment noting that the Order Limits is high and undulating compared with the surrounding landscape and that this increases impacts and limits the efficacy of mitigation.	The proposed mitigation measures take into account the topography of the Site. The Applicant has acknowledged that the topography of the Order Limits is varied 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]**. This is reflected in the selection of viewpoints illustrated in **ES Volume 3, Figure 10.6: Viewpoint locations [EN010158/APP/6.3] [APP-069]** and hence the LVIA provides representative views from which the efficacy of mitigation can be assessed including from a number of more elevated and longer distance views where the Proposed Development would potentially be visible. Larger elements of the Proposed Development, such as Rosefield Substation, the Main Collector Compound and BESS, have been located in lower lying or flatter areas of the Site to reduce visual impacts. In addition, existing vegetation is largely retained and will be managed in a sustainable way to achieve taller heights, as set out in the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3]**, and new planting has been proposed in locations that will reduce visual impacts from the Proposed Development.
7.1.2	CSAG (Page 97, Paras. 4.2.1 and 4.2.3 – 4.2.7)	Comment that it is not clear why the Landscape and Visual Chapter ascribes low levels of landscape sensitivity to certain parts of the Proposed Development and the study area. Specifically, LCT 5 Shallow Valleys (direct effects), and Landscape Character Areas (LCAs) 5.4 Twyford Vale and LCA 5.6 Claydon Valley (indirect effects). Further comment noting that ascribing 'low sensitivity' to these landscape classifications is not agreeable and that they should be ascribed a 'medium sensitivity' due to several indicators of higher sensitivity.	The Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. Together with the methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment. The Applicant disagrees that the setting of heritage assets in Winslow is a pertinent factor when considering landscape value, and as noted in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** Winslow Conservation Area was scoped out of the heritage assessment in agreement with Buckinghamshire Council's Built Heritage Adviser.
7.1.3	CSAG (Page 99, Paras. 4.2.16 and 4.2.17)	Comment noting that the Landscape and Visual assessment of the East Claydon BESS judged LCA 5.7 Hogshaw Claylands as being of medium sensitivity whilst the Landscape and Visual Chapter rates it as medium-low. Further comment that the Chapter does not explain why LCA 5.7 is treated as more sensitive than other LCAs in LCT 5, and the CSAG are requesting clarification. Further comment agreeing with LCA 5.7's concluded level of susceptibility but that it is not clear what differentiates LCA 5.7 to LCA 5.4 and LCT 5.	The Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. Together with the methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment. In brief, these LCT/LCA are all judged to be of equal (community) value but of different susceptibility as a result of their individual ability to accommodate the potential change as a result of the Proposed Development: LCA 5.7 is judged of medium susceptibility as the host landscape to almost the entirety of Parcel 3; LCA 5.6 is the host landscape to only one small field of Solar PV modules which is located immediately adjacent to the existing National Grid East Claydon Substation and is judged of medium/low susceptibility; LCA 5.4 is affected only indirectly and has very limited intervisibility with the Proposed Development and is therefore judged of low susceptibility. It is noted that LCT 5 covers a much wider extent of landscape and therefore has a greater ability to absorb the scale of development proposed.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
7.1.4	CSAG (Page 100, Para. 4.2.22)	Comment noting that the presence and appearance of the existing East Claydon Substation in LCA 5.6 is not sufficiently great to justify why LCA 5.6 is categorised as being of low sensitivity.	The Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112].** As set out at **Ref. 7.1.3** above, LCA 5.6 is judged to be of medium/low susceptibility on the basis that a single small field of Solar PV modules located immediately adjacent to the existing National Grid East Claydon Substation would not appear uncharacteristic within the host landscape. In addition, there would only be very limited intervisibility of the Proposed Development within the wider LCA 5.6.
7.1.5	CSAG (Page 101, Paras. 4.3.2 to 4.3.5)	Comment noting that levels of sensitivity to LCT 7 and its daughter LCAs have been underestimated by the Landscape and Visual Chapter. Further comment that indirect effects on LCAs 7.2, 7.4 and 7.1 would be indirectly affected and ought to be added to the Landscape and Visual Chapter.	The Applicant disagrees that the assessment of landscape sensitivity has been underestimated. As described at **Ref. 7.1.3** above, the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment. In brief, LCA 7.3 is judged to be of regional value and medium susceptibility with some ability to accommodate the Proposed Development, particularly to the western extent of the Order Limits. LCT 7 covers a much wider extent of landscape which has much less intervisibility and therefore has a greater ability to absorb the scale of development proposed. As set out in Table 10.3 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** LCA 7.1, 7.2 and 7.4 were scoped out of the assessment in agreement with Buckinghamshire Council's Landscape Officer.
7.1.6	CSAG (Page 103, Paras. 4.3.11 and Page 112, Para. 5.4.5)	Comment noting that the Landscape and Visual Chapter ascribes LCA 7.3 a medium sensitivity which is equal to LCA's 9.1 and 9.2, though these latter LCAs lie within an Area of Attractive Landscape (AAL) and so clarity is sought why these are considered to be of a medium sensitivity too. Further comment noting that the direct effect on the extent of LCA 9.1 which lies within the AAL should attract major adverse, not major - moderate adverse significance.	As set out at **Ref. 7.1.3** above the Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. The assessment of value for LCA 7.3 identifies a number of factors that raise its value above that of community and in this instance it has been judged to be of equal (regional) value to that of the Area of Attractive Landscape, albeit with some difference in susceptibility: LCA 7.3 is judged of medium susceptibility as the host landscape to the entirety of Parcel 1 and a proportion of Parcel 2; LCA 9.2 although affected indirectly, is also judged of medium susceptibility due to its Special Qualities including "*spectacular panoramic views*" of the surrounding countryside; LCA 9.1 is judged as high/medium susceptibility as a relatively quiet landscape with limited existing detractors and therefore with a lower ability to accommodate the proposed change. The Applicant disagrees that the level of adverse landscape effect should be increased for LCA 9.1. The Applicant considers the assessment set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** to be robust, legible and consistent and therefore compliant with implementation of best practice methodology with no requirement for reassessment.
7.1.7	CSAG (Page 103, Paras. 4.4.2)	Comment noting that it is not clear why the Landscape and Visual Chapter ascribes LCT 9 and LCAs 9.1 and 9.2 a medium sensitivity, and that a medium sensitivity is the highest score given to all landscape sensitivities. Further comment seeking clarification on this judgment is sought.	As set out at **Ref. 7.1.3** above the Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. These LCT/LCA are located within the AAL within the study area and have therefore been judged as of regional, and not community or national value. As described in the response immediately above, their susceptibility ranges from medium to medium high as a result of their individual ability to accommodate the potential change as a result of the Proposed Development. The Applicant therefore disagrees that the levels of sensitivity should be increased for these LCT/LCA.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
7.1.8	CSAG (Page 104, Paras. 4.4.6 and 4.4.7)	Comment noting that, in the context of sensitivity setting, the non-AAL parts of LCT 9 should be regarded as high sensitivity and the ALL parts of LCT 9 should be a higher sensitivity, which is not possible to capture in the Chapter's three-point approach. Further comment noting that it is not clear why LCA 9.3 is considered to be medium-low rather than a medium sensitivity and why LCA 9.1 is a higher sensitivity than its mother LCT 9.	As set out at **Ref. 7.1.3** above the Applicant has set out a detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**. These LCT/LCA lie within the AAL within the study area and have therefore been judged as of regional, and not community or national value. As described in the sensitivity appraisal, their susceptibility ranges from medium/low to high/medium as a result of their individual ability to accommodate the potential change as a result of the Proposed Development. The Applicant therefore disagrees that the levels of sensitivity should be increased for these LCT/LCA.
7.1.9	CSAG (Page 106, Para. 5.1.5)	Comment noting that the Outer Aylesbury Ring long-distance trail on the northern slopes of Quainton Hill would be a viewpoint that could be considered for the Accompanied Site Visit (ASI).	The Applicant notes that interested parties were able to comment on the **Applicants Draft Itinerary for the Accompanied Site Inspection (ASI) [EN010158/APP/8.10] [REP1-110]** with any suggested locations and request to join the Accompanied Site Inspection at Deadline 2. Those comments will be taken into consideration by the Examining Authority when it decides the final itinerary for the Accompanied Site Inspection.
7.1.10	CSAG (Pages 109 and 110, Para. 5.2.10)	Comment noting that high levels of adverse magnitudes of landscape effect are attributed to the Proposed Development by the Applicant and other consultees and that such effects are inevitable. Further comment that a reduction in size of the Proposed Development is unlikely to result in levels being much lower.	The Applicant has acknowledged that there would be some large-scale change to the landscape in the Order Limits as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** which would result in some significant adverse landscape and visual effects for the duration of the operation (including maintenance) phase. 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 the potential significant adverse impacts which, as the Environmental Statement sets out, are limited.
7.1.11	CSAG (Page 110, Para. 5.2.11 – 5.2.15 and Page 148, Paras. 9.7 – 9.11 and Page 153, Paras. S1.15 and S1.16)	Comment noting that the CSAG does not agree with the Applicant's rebutting response to Buckinghamshire Council's Relevant Representation which stated 'the Proposed Development would have an industrialising effect on a rural landscape'	The Applicant acknowledges that the CSAG does not agree with the Applicant's response to Buckinghamshire Council's Relevant Representation concerning the industrialising effect of the Proposed Development. However, the Applicant reiterates their position as set out at RR-026, General Comment, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** which is that while there would be likely significant effects on landscape and visual amenity as presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2],** this change would not result in the creation of an industrialised landscape.
7.1.12	CSAG (Page 111 and 112, Paras. 5.3.1 – 5.3.7)	Comment agreeing with the Landscape and Visual Chapter's assessment of direct significant effects on landscape character but that such effects would be a certain degree higher than the Chapter predicts. Further comment that this would result mainly because of the underestimation of levels of sensitivity.	The Applicant acknowledges the CSAG agreement that the direct landscape effects on the character of the Order Limits would be significant adverse. The Applicant disagrees, for the reasons stated at **Ref. 7.1.3** above, that the overall levels of effect should be increased due to under assessment of levels of sensitivity.
7.1.13	CSAG (Page 112, Paras. 5.3.7)	Comment noting that the Landscape and Visual Chapter often reports effects across the construction and decommissioning phases as being lower than the	The assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** provides a detailed description of the likely significant effects on landscape and visual amenity during all phases of the Proposed Development. All relevant factors concerning scale and extent,

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		operation (including maintenance) phase effects. Further comment that is it assumed the Chapter may have factored the short construction and decommissioning periods in concluding effect but that the overall level of effect should be reported and the period during which it would be experienced noted separately. Clarity is sought on this.	including the potential for increased movement, temporary lighting, temporary Construction Compounds and cable laying have been considered for the construction period. As described in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110] the duration of effect acts as a modifying factor, which, given the at most medium-term nature of the construction phase, reduces the level of overall effect when compared with the long-term effects of the operational (including maintenance) phase.
7.1.14	CSAG (Page 113, Paras. 5.4.12)	Comment noting that the Proposed Development would obscure views of the land but also introduce alien, industrial elements which pose a static, year-round appearance which differs to the seasonally dynamic landscape which exists today. Further comment that the Proposed Development will have notable adverse effects on the settings of heritage assets whose significance depends on the agricultural context.	It is noted that these comments are made in relation to setting effects on heritage receptors which are described in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**. The Guidelines for Landscape and Visual Impact Assessment, Third Edition, note the need for separate assessment of cultural heritage at Paragraph 5.11. The Applicant has concluded within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** that, with the exception of Pond Farmhouse, the effects on heritage assets as a result of changes in their setting would be at the lower end of less than substantial harm and would not represent significant effects.
7.1.15	CSAG (Page 113, Paras. 5.4.13 – 5.4.15)	Comment noting that the Proposed Development's proposal to let hedgerows grow up to 3.5m will result in the loss of views from/of heritage assets, rural lanes, footpaths and properties. Further comment that there is an overreliance on screening views but that the setting of a heritage asset is neither necessarily determined by its present-day visibility, nor even by visibility per se.	As stated in the Applicant's response above, it is noted that these comments are made in relation to setting effects on heritage receptors. As described in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** the heights of hedgerows will generally be maintained between 3-3.5m depending on the mitigation requirements. **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]** have acknowledged the effects of such change within the setting of heritage assets from the altered land use (regardless of visibility) where this contributes to the significance of the heritage assets. The height of mitigation planting was incorrectly reported within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** which has been updated at Deadline 2. Screening has been used where it is appropriate to mitigate landscape and visual effects and effects on the setting of heritage asses, and has been avoided where it is not appropriate - for example hedgerow planting has been restricted to maintain the appearance of Knowl Hill from Claydon House. No assets have been identified where obstruction of views of or from the asset by proposed hedgerows would result in harm to significance.
7.1.16	CSAG (Page 114, Paras. 5.5.3 – 5.5.5)	Comment noting that the cumulative development pressures place increasing pressure on the landscape resource and its susceptibility to change. Further comment that the Order Limits currently provide a critical gap between cumulative developments for the movement of people and wildlife.	As the Applicant set out at RR-026, Cumulative effects, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006], 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. As set out in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2]** [REP1-044] there would also be increased combined effects on Landscape Character Area 5.6: Claydon Valley, Landscape Character Area 5.7: Hogshaw Claylands and the Quainton-Wing Hills Area of Attractive Landscape, albeit with no change to overall significance. The Applicant has therefore acknowledged that not all cumulative effects can be mitigated. However, as set out at RR-026, Cumulative effects, of the **Applicant's Response to Relevant Representations**

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			[EN010158/APP/8.3] [PDA-006], 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 **Outline RoWAS [EN010158/APP/7.8.3]** requires any new or diverted routes to be designed in accordance or with regard to design standards adopted by Buckinghamshire Council, and be approved by Buckinghamshire Council before they are implemented. Details such as route width and surfacing would be further assessed at the detailed design stage as a result and would be discussed with and approved by Buckinghamshire Council at that stage. Along with retaining existing habitats wherever possible, the locations of mitigation areas have been chosen to ensure connections between the existing SSSIs, and ancient woodlands adjacent to the Site would be enhanced by creating species-rich grassland and arable margins along with scrub and tree planting. This would create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats.
7.1.17	CSAG (Page 114 and 115, Paras. 5.6.5, 5.6.11 and 5.6.16 and Page 149, Para. 9.26 and Page 154, Para. S1.33)	Comment noting that the Landscape and Visual Chapter considers the moderate beneficial effect to landscape fabric to be significant in EIA terms and that this is the result of the application of professional judgement. Further comment that this judgement had lowered the threshold for significance. Further comment requesting that the Applicant explains why the Landscape and Visual Chapter concludes that the landscape 'fabric' is of a higher level of sensitivity than the landscape character receptors. Further comment noting that, as best, changes to landscape fabric result in a neutral effect at best.	The Applicant disagrees that describing a moderate effect on landscape fabric as significant lowers the threshold for significance. As clearly set out on page 53 of **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** professional judgement is applied to determine whether all moderate effects are significant or not. Differences in levels of sensitivity of landscape fabric and landscape character result from their separate assessment as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. As described in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** landscape condition, which includes the elements of hedgerows, trees and woodlands that make up landscape fabric, is generally described as good to very good, hence value is judged to be high. The Proposed Development has been designed to avoid blocks of woodland as per the **Outline CEMP [EN010158/APP/7.2.3]** and as illustrated in **Outline LEMP [EN010158/APP/7.6.3]** vegetation removal would be limited, making use of existing gaps and access points where possible. Hence susceptibility is judged to be medium and the overall sensitivity of landscape fabric high/medium. Given that the planting of new hedgerow and structural woodland proposed within the Order Limits would far exceed the amount removed during construction, the Applicant disagrees that changes to landscape fabric would result only in a neutral effect. Any beneficial effects of the proposed mitigation are considered only in the assessment of changes to landscape fabric and are not considered as any form of offset when considering effects on landscape character.
7.1.18	CSAG (Page 114, Para. 5.6.6)	Comment disagreeing with the wording of the Landscape and Visual Chapter at Paragraph 10.1.8 since it is incorrect to assert that all landscape effects stem from changes to physical fabric as disturbance, movement, noise, odour, awareness and other non-physical factors alter both how a landscape is experienced and, critically, how it functions.	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 considered that any such non-significant effects would not add further to the judgement of susceptibility afforded to receptors. The requirement for an odour assessment was not required to be scoped into the EIA from the outset of the Proposed Development. The additional movement of vehicles within the landscape has been considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The Applicant therefore maintains that such 'sensory impacts' have been considered in both the assessment and mitigation of effects.

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7.1.19	CSAG (Page 114, Para. 5.6.10)	Comment requesting the Applicant states the level of landscape value and susceptibility to change with a view taken from the combination of levels of value and susceptibility to change.	The Applicant has set out a detailed assessment of landscape value and susceptibility in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** for all relevant LCT/LCA. Table A10.1 in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** demonstrates how the assessments of value and susceptibility are combined to provide an overall judgement of landscape sensitivity. As stated in para. 10.1.9 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** effects on landscape fabric (rather than overall landscape character) consider the removal or addition of elements, which in this case consists primarily of hedgerows and hedgerow trees. As described at **Ref. 7.1.15** above hedgerows and trees are considered to be in generally good to very good condition and value is judged to be high. Potential vegetation removal would be limited, hence susceptibility is judged to be medium and the overall sensitivity of landscape fabric high/medium.
7.1.20	CSAG (Page 280)	Comment noting that bridleway ECL/5/1 is another key PRoW that will be significantly impacted by the Proposed Development.	As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** although mitigation measures would reduce operation (including maintenance) phase effects from major/moderate (year 1) to moderate (year 10), effects on PRoW ECL/5/1 have been assessed as significant during all phases of the Proposed Development.
7.1.21	CSAG (PRoW Impacts and General Comments, Page 285)	Comment noting that the Proposed Development will have an acute effect on the Aylesbury Vale AAL. The southern portion of the Proposed Development, and particularly Fields D28 and D29 are situated within this area. The BESS is also located in close proximity to this area and is likely to be visible nearby. The industrialising effect of the solar installation will be substantial within this area, which is recognised and protected for its rurality.	The assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of the operation (including maintenance) phase within defined parts (namely Fields 28 and 29) of Landscape Character Area 9.1: Finemere Hill. However, the Applicant disagrees that this, together with the location of the BESS, would have an 'acute' effect on the much wider Aylesbury Vale AAL, for which effects have been assessed as not significant. As described at reference 8.1.11 above the Applicant does not consider the terms 'industrialisation' and 'industrialised' applicable to the Proposed Development.
		Effects on Visual Amenity	
7.1.22	CSAG (Page 21, 40 and 41, Paras. 92 and 181 – 183 and Page 58, Para. 39)	Comment noting that the CSAG disagree with the methodology and conclusions of the Residential Visual Amenity Assessment. Further comment noting concern with the Applicant's interpretation of the Landscape Institute's RVAA Technical Guidance Note 2/19 in determining the screening distances specified within the Assessment.	The Applicant disagrees that best practice guidance has not been followed. The methodology for the RVAA is provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. As per the Landscape Institute's RVAA Technical Guidance Note 2/19, the RVAA initially considers the change in visual amenity as the result of the addition of the Proposed Development to the existing baseline landscape. As per TGN 2/19, it then considers the residual effects following proposed mitigation. These effects are then considered in the round when judging whether the RVAA threshold has been reached. The Applicant disagrees that greater screening distances would demonstrate effects exceeding the RVAA threshold. A detailed assessment of visual effects on residential receptors/settlements not included in the RVAA is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and none have been assessed as experiencing significant adverse effects.
7.1.23	CSAG (Page 36, Para. 161)	Comment that dwellings in settlements adjacent to or close to the Proposed Development will experience	A detailed assessment of visual effects on residential receptors/settlements is included in **ES Volume 2, Chapter 10: Landscape and Visual**

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		adverse impacts, including loss of views, noise and vibration and wider construction phase effects.	**[EN010158/APP/6.2.2]** and in the RVAA provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]** [APP-114]. With regard to visual receptors within settlements, none have been assessed as experiencing significant adverse effects. With regard to individual properties, the residents of 4-7 Catherine Cottages, Bernwood Farm and Sion Hill Farm would experience significant visual effects during Year 1 of the operation (including maintenance) phase. By Year 10 of the operation (including maintenance) phase, residual significant effects would remain for just Bernwood Farm and Sion Hill Farm. These effects would be experienced primarily due to the introduction of the Proposed Development into existing views rather than the loss or screening of views. Sources of noise and vibration associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures, hence no further intra-project impacts would accrue.
7.1.24	CSAG (Page 41, Para. 184)	Comment considering that the Applicant has taken conspicuousness of development to refer only to height. Further comment on the Landscape Institute's RVAA Technical Guidance Note 2/19 noting that the extent and impact of development is as important as height. An example is provided for with regard for the Rosefield Substation, in combination with cumulative developments.	The Applicant disagrees that the extent of screening distances for RVAA receptors is inadequate. As presented on page 9 of the **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]** [APP-114] the height parameters of the Proposed Development are noted in the context of other large-scale developments with similar profiles; in comparison, the screening distances for the Proposed Development are appropriate. With regard to cumulative visual effects, it is noted in **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3]** that there would be no long-term increased significant effects on properties/settlements outside of the RVAA screening distances; a number of properties to the western extents of Granborough would experience significant effects at Year 1 of the operation (including maintenance) phase as a result of in combination effects with East Claydon BESS, however, these effects would reduce to moderate (not significant) at Year 10 of the operation (including maintenance) phase.
7.1.25	CSAG (Page 42, Paras. 188 and 189)	Comment that the Residential Visual Amenity Assessment 800m screening zone for the Rosefield Substation narrowly excludes dwellings in East Claydon and Botolph Claydon (conservation area), although the countryside outlooks from these properties. Further comment that the Proposed Development is likely to become a dominant feature in views beyond the buffer zones allowed for in the Residential Visual Amenity Assessment.	The Applicant disagrees that the Proposed Development is likely to become a dominant feature in views beyond the buffer zones. Whilst the buffer zone has been set at 800m, it is noted that nearest residential property in either village is over 1km distant and would have limited views of the Rosefield Substation set low down in the landscape as illustrated by viewpoints 13, 21 and 40 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4]** [APP-115] [APP-116]. As detailed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** there are no residential receptors/settlements outside of these screening distances that would experience significant adverse effects during any phase of the Proposed Development.
7.1.26	CSAG (Page 42, Paras. 190 - 192)	Comment noting that a ZTV mapping exercise (without vegetation) would provide a more robust screening exercise for the Residential Visual Amenity Assessment.	Bare earth ZTV mapping is provided in **ES Volume 3: ZTV – Bare Earth [EN010158/APP/6.3]** [APP-069] for all height parameters of the Proposed Development as requested by Buckinghamshire Council.

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7.1.27	CSAG (Page 42, Para. 193)	Comment noting that it is not clear how the Residential Visual Amenity Assessment has measured the distances between the curtilages of the dwellings and the Proposed Development.	As described in para. 1.6.7-1.6.8 of **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** the distances noted are from the property to the Proposed Development; properties have been included where the dwelling itself lies beyond the buffer distances but the primary garden space extends to within it. These distances are annotated on the RVAA Property Plans provided for each RVAA property in **ES Volume 3, Figure 10.14-10.26: RVAA Property Plans [EN010158/APP/6.3] [APP-069]**.
7.1.28	CSAG (Page 43, Paras. 194 and 195)	Comment noting it is difficult to scale from the Applicant's layout drawing and the Residential Visual Amenity Assessment does not provide mapping showing how distances between the properties and Proposed Development were measured. Further comment requesting that the Applicant provides mapping showing the distances between the properties screened in and the Proposed Development.	The annotated plans in **ES Volume 3, Figure 10.14-10.26: RVAA Property Plans [EN010158/APP/6.3] [APP-069]** provide a clear measure to the Proposed Development from each RVAA property.
7.1.29	CSAG (Page 43, Para. 196)	Comment noting that visualisations or wire frame representations would be helpful in illustrating the potential visual impacts with regard for the Residential Visual Amenity Assessment.	Type 1 visualisations are presented in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-118]** for all assessed RVAA properties.
7.1.30	CSAG (Page 43 - 47, Paras. 197 – 213 and Page 143, Para. 7.5.1)	Comment that the Residential Visual Amenity Assessment does not consider the quality, nature or extent of existing views and that this approach does not accord with the Landscape Institute's RVAA Technical Guidance. The CSAG response goes on to identify examples where it is considered that the Residential Visual Amenity Assessment is flawed. These areas of concern can be summarised as follows: • 4-5 Catherine Cottages where the RVVA notes these properties would have glimpses of the Proposed Development. Comment that the photographs within the RVAA indicate clear views of open countryside and that these properties would be bound on three sides by the Proposed Development. Further comment that the impacts on these properties is considered to meet the RVAA threshold in CSAG's view; • Sion Hill Farmhouse where the RVAA notes that the Proposed Development would not have an overbearing effect on this property or its residents. Comment that the photographs within the RVAA demonstrate the property overlooks open fields. Further comment noting that, in combination with the East Claydon	The Applicant disagrees that the quality, nature and extent of existing views has not been considered in the RVAA. As presented on page 5 of **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** all RVAA properties are considered to be of high sensitivity to change in the view, hence the quality (value) of all views is considered as high. In each case the nature of effect is described in terms of direction of view, permanence and whether adverse or beneficial in Tables A10.5.4-A10.5.16. Likewise, the extent of the Proposed Development in view is also described in detail in Tables A10.5.4-A10.5.16. The Applicant disagrees that RVAA is flawed for the following reasons: • Whilst it is acknowledged that the Proposed Development would be located to three sides of Catherine Cottages, by Year 10 of the Proposed Development's operation (including maintenance) phase the Solar PV modules would either be predominantly screened by new hedgerow planting (to the south and southeast) or viewed obliquely at distances over 100m (to the southwest); • The RVAA acknowledges that residents of Sion Hill Farm would experience major effects at Year 1 which would reduce to major/moderate at Year 10. However, these effects are not considered overbearing as they would be viewed at distances of at least 280m and would retain a buffer of undeveloped land between the property and the Proposed Development. They would also be viewed in the context of the existing large overhead lines and glimpses of the National Grid East Claydon Substation. Based on information provided by NGET to date, any views of the proposed National Grid East Claydon Substation Extension would be limited

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		Project, the property would be surrounded by industrial scale development and so it is not understood how the Applicant has concluded the RVAA threshold has not been met in this case; • Borshaw Farm is noted to have not been visited and it is not clear why this is the case as it sits within the 400m screening distance to the BESS; and Other examples in the RVAA, such as Pond Farmhouse, the Old Dairy and Granary Cottage, are considered to lose their views as a result of the Proposed Development and that the RVAA's reliance on intervening vegetation is insufficient.	to oblique first floor views by intervening local topography, outbuildings and barns with no notable increase in the scale of change; and • The residents of Borshaw Farm did not respond to the request for an RVAA visit. Although within the 400m screening distance the property was viewed externally from Claydon Road and was excluded from further study on the basis that it was predominantly screened by intervening buildings and mature vegetation as detailed in Table A10.5.1 Preliminary residential property visits in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. With regard to the Pond Farm complex of properties, it is noted that ground floor views of the Proposed Development would be largely unaffected, whilst views on the approach track would be largely screened by Year 10. Whilst it is acknowledged that small changes would remain from some upper storey windows, these would not reach the Residential Visual Amenity Threshold.
7.1.31	CSAG (Page 118, Paras. 6.7 and 6.8)	Comment noting that the Landscape and Visual Chapter provides a limited analysis of non-visual aspects of amenity and that such assessments should ideally consider non-visual matters such as social, recreational and residential amenity. Further comment noting the CSAG concludes that the highest sensitivity amenity receptors would experience significant adverse effects during all phases of the Proposed Development.	The Applicant disagrees that the LVIA provides a limited analysis of non-visual aspects of amenity, albeit no specific examples of omissions are given by the CSAG. As described in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** the assessment of landscape value takes into account factors related to natural and cultural heritage (for example ecological, geological or heritage matters), landscape condition, cultural associations (in terms of connections with people, arts or events), distinctiveness (i.e. a sense of unique identity in the landscape), recreational opportunities, perceptual aspects (including scenic quality, wildness and tranquillity) and landscapes with a clearly identifiable role or function. The Applicant disagrees that all receptors of highest sensitivity would experience significant effects as this judgement is also dependent on the magnitude of effect.
7.1.32	CSAG (Page 118, Paras. 6.9)	Comment noting that the Landscape and Visual Chapter assigns LCA 5.7 low 'Community' value whilst LCA 7.3 is given a moderate 'Regional' value without explanation, despite the Chapter's sensitivity appraisal recording both being 'farmed' landscapes. Further comment noting that LCA 5.7 provides 'local recreational opportunities' and that this is not noted in LCA 7.3's level of value.	The Applicant disagrees that difference in landscape value of LCA 5.7 and LCA 7.3 is not clearly explained. The increased assessment in value of LCA 7.3 over LCA 5.3 is clearly identified by a number of factors considered of regional value as noted in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]**.
7.1.33	CSAG (Page 118, Paras. 6.10)	Comment noting that the CSAG has found that the network of lightly trafficked rural lanes and PRoWs are enjoyed by both local communities and those travelling through the area and so these receptors are of at least moderate regional value.	As described on page 11 in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** greater weight is intentionally attributed to the susceptibility of the visual receptor than to value in recognition of the fact that relatively few views are specifically recognised through designation or cultural reference. Hence a higher sensitivity of high/medium is ascribed to receptors whose views are considered of either community or regional value.

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7.1.34	CSAG (Page 129, Para. 7.2.4)	Comment noting that the levels of adverse visual effects have been underestimated in the Residential Visual Amenity Assessment.	The Applicant disagrees that the RVAA has underestimated the levels of adverse visual effects having provided a detailed assessment in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** which follows Landscape Institute best practice as described at reference 8.1.22 above.
7.1.35	CSAG (Page 141, Paras. 7.4.6 – 7.4.9 and Page 142, Para. 7.4.11)	Comment noting that the Landscape and Visual Chapter concludes that between Years 1 and 10 of the operation (including maintenance) phase of the Proposed Development, a moderate magnitude of effect on visual amenity would occur along viewpoints relating to the Bernwood Jubilee Way but that this conclusion does not take account of the magnitude varying along the Way as a result of the Way's proximity to the Proposed Development and intervening screening. Further comment requesting clarification from the Applicant as to whether the moderate magnitude of effect is an average measure or whether this is experienced at certain viewpoints only.	**ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113]** provides a detailed analysis of the scale of change (from negligible to large) that would be experienced along the Bernwood Jubilee Way at each viewpoint. This information is summarised in Table 10.12 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** The LVIA then provides a detailed narrative description of how receptors would experience the Proposed Development along the route within the Order Limits (pages 115 to 116 and pages 172 to 173) which includes a description of how the experience of the scale of effect would vary, in this case from large to medium. This assessment, together with a judgement of the geographic extent of its influence and its duration are taken into account in order to assess the level of magnitude. The judgement of magnitude is therefore specific to the visual receptors who would experience the Proposed Development from within the study area.
7.1.36	CSAG (Page 320)	Comment requesting assessment of potential risks of the development to TCS Biosciences, Hogshaw Wildlife Park and Claydon Park. This should include loss of visual amenity.	The Applicant points to their position as set out at RR-049, Impact on local businesses, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. In developing the Proposed Development, the Applicant has taken feedback from concerned non-agricultural businesses, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential effects on visual amenity, noise and accessibility.
7.1.37	CSAG (Page 320)	Comment on additions to improve the Residential Visual Amenity Assessment including ZTV mapping to determine buffer zones, revisit conclusions to assume that existing vegetation may not persist for the full lifetime of the development and that mitigation planting may not be fully (or at all) effective, visualisations or wire frame representations to illustrate potential visual impacts, and take existing vegetation screening into account in the RVAA of Borshaw Farm as it may not last the lifetime of the development.	Information regarding ZTV mapping and buffer zones is set out under **Refs. 7.1.26 to 7.1.29** above. As noted in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** changes to the future baseline, such as wholesale loss of existing mature vegetation due to climate change, are difficult to predict with any accuracy and the future baseline has been taken to be the same as the current baseline. Annotated visualisations for all RVAA properties are provided in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-118]**. The Applicant reiterates their position that the assessment assumptions with regard to mitigation planting on pages 48-50 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** are realistic and that, as per the assumptions regarding future baseline, it would be difficult to predict the potential failure of some or all mitigation planting. In addition, as set out in the **Outline LEMP [EN010158/APP/7.6.3],** heights and densities of new tree and hedgerow will be monitored in years 1, 2, 3, 5 and 10 to help ensure they reach the target heights set out in the Environmental Statement. The target height for hedgerows is generally 3- 3.5m for

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			year 10, depending on specific screening requirements, whilst the target height for woodland is at least 4m by year 10.
		The Adequacy of Landscape and Visual Mitigation	
7.1.38	National Trust (Pages 1 and 2)	Comment requesting additional tree planting along Three Points Lane is secured in the detailed LEMP, based on their Relevant Representation.	Embedded mitigation measures to soften and partially screen views of Solar PV and the Satellite Collector Compound from Claydon Park include infill hedgerow and tree planting along Three Points Lane and new hedgerow (early) planting along the eastern boundary in Field B22 and north of Field B23 (North). This is shown in and secured by **Appendix 2** to the **Outline LEMP [EN010158/APP/7.6.3]**.
7.1.39	National Trust (Page 2)	Comment stating that while the new hedgerows proposed for Field B23 (North) and on the edge of Field B22 aren't generally consistent with the historic field pattern, they would provide some screening of the Solar PV modules.	The Applicant acknowledges this point regarding hedgerow field pattern but notes that these new hedgerows would not appear uncharacteristic and will provide an important screening element.
7.1.40	CSAG (Page 17, Para. 74)	Comment noting that the undulating topography of the Order Limits creates difficulties in being able to provide mitigation screening.	This point has been addressed at **Ref. 7.1.1** above.
7.1.41	CSAG (Page 114, Paras. 5.6.1 and 5.6.2)	Comment disagreeing with the Landscape and Visual Chapter's assessment that, at Year 10 of operation, the Proposed Development's proposed planting would have a moderate beneficial effect on the landscape fabric.	This point has been addressed at **Ref. 7.1.17** above.
7.1.42	CSAG (Page 114, Para. 5.6.4 and Page 130, Para. 7.3.7 and Page 135 and 136, Paras 7.3.31 – 7.3.33, 7.3.35 and 7.3.42)	Comment noting that it is highly unlikely that existing and proposed planting vegetation will reliably screen views for the operation (including maintenance) phase of the Proposed Development as it could be felled, trees with ash dieback, and hedges with Dutch elm disease.	The **Outline LEMP [EN010158/APP/7.6.3]** requires monitoring of all habitats created or enhanced to ensure they achieve the target level of mitigation. In addition, it is noted that the National Trust's concern with regard to management of elm hedgerows has been resolved with the proposed hedgerow maintenance as set out in paras 5.2.11 to 5.2.17 of the **Outline LEMP [EN010158/APP/7.6.3]**.
7.1.43	CSAG (Page 115, Paras. 5.6.12 and 5.6.14)	Comment noting that proposed planting which is required for mitigation cannot be double counted as providing enhancement/beneficial effects. Further comment clarifying that enhancements are not required to mitigate adverse effects and so they can be counted as benefits.	The assessment of effects in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** does not double-count mitigation measures as potentially off-setting levels of harm. GLVIA3 para.39, as quoted by CSAG, simply clarifies that mitigation measures should be explicitly identified as such, as required by EIA Regulations, and not referred to as enhancements; the latter are optional whereas mitigation is specifically required by the EIA Regulations. The LVIA provides a clear distinction between mitigation measures required to reduce harmful effects and what can be considered as an enhancement.
7.1.44	CSAG (Page 115 and 116, Paras. 5.6.19 - 5.6.21 and Page 134, Paras. 7.3.24 –	Comment noting that the Landscape and Visual Chapter does not factor that landscape planting would give rise to adverse landscape and visual effect. Further comment that tall hedgerows across the Order Limits would be	The Applicant disagrees that hedgerows of between 3-3.5m would be an uncharacteristic feature in the landscape. In addition, the target height for hedgerows is dependent on the specific screening requirements for each receptor, with heights of 3-3.5m being the maximum. As noted on page 49 of the CSAG WR, hedgerows have already grown up to 4-5m in some parts of the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
	7.3.28 and Page 142, Para. 7.4.14)	uncharacteristic with the way in which the landscape currently appears. Further comment that tall hedges would result in the loss of characteristic openness that is currently experienced.	study area. Nevertheless the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** takes into account how changes to the sense of openness would affect both landscape and visual receptors, including where existing open views would be lost, such as along parts of Splash Lane. It should be noted that the assessment of residual effects takes into account any such loss of views, whilst also recognising a reduction in scale of effect as a result of screening/filtering views of the Proposed Development by mitigation planting. In each case, PRoW would have appropriate offsets and the Proposed Development would not be oppressive or overbearing within the landscape.
7.1.45	CSAG (Page 121, Paras. 6.31 – 6.33)	Comment noting that the Proposed Development may create inescapable corridors where PRoWs and/or Permissive Paths are managed and create conflict areas between users and nature.	Fence lines would be offset by 10m to either side of PRoW. This means that PRoW corridors would be a minimum of 10m wide e.g. in locations where the PRoW runs along an existing field boundary or hedgerow. Where the PRoW passes through the panel areas, the corridor would be a minimum of 20m wide as a result of the 10m offset to either side of the PRoW. Along the Mid Shires Way/North Bucks Way a 30m offset would be applied and along the Bernwood Jubilee Way a 55m offset. These corridors are therefore sufficiently wide to avoid creating inescapable corridors. This is secured under design commitment F1 of the **Design Commitments [EN010158/APP/5.9.4]**. In addition, design commitment B5 requires the proposed fences to permit the passage of wildlife, either through a clearance at ground level or via mammal gates.
7.1.46	CSAG (Page 137, Paras. 7.3.46 and 7.3.47 and Page 143, Para. 7.4.22)	Comment noting that the Landscape and Visual Chapter's photomontages assume the full establishment of planting and that the lighting and panel colour and textures downplay the fair representation of the Proposed Development and glint and glare effects. A CGI generation is provided for by CSAG on Page 138.	The Applicant has provided accurate visualisations illustrated in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-117]** which follow best practice guidance as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** illustrating effects at year 1 (without mitigation) and year 10 (with mitigation). This includes the use of a solar PV module model that provides an accurate representation of panel reflectivity and the specific lighting conditions for each photograph. The preparation and presentation of images using artificial intelligence (AI) is not acceptable in terms of the presentation of accurate visualisations accompanying professionally authored LVIAs. The AI images presented by CSAG are inaccurate in terms of corridor dimensions, location and design of fencing and security cameras and appearance of the landscape generally and cannot be considered as representative of actual views.
7.1.47	CSAG (Page 142, Para. 7.4.19)	Comment noting that the effect at viewpoint 30 would be higher than the moderate adverse and significant effects concluded during the operation (including maintenance) phase along viewpoints along the Outer Aylesbury Ring.	The Applicant has undertaken a detailed assessment of effects with regard to the Outer Aylesbury Ring in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** which takes into account, amongst other factors, the regional value of the view and the scale and extent of the Proposed Development in distant panoramic views.
7.1.48	CSAG (Page 143, Paras. 7.5.3 and 7.5.7)	Comment noting that some residential amenity effects would be higher than predicted because many views are elevated meaning that screening cannot take effect and such other screening would be uncharacteristic of the wider landscape. Further comment noting that the levels of effects experience by receptors should be higher since the RVAA categorises all residential receptors as high	The Applicant notes that, at page 57, CSAG acknowledge that an RVAA has not been undertaken by the group. A detailed assessment of visual effects on residential receptors/settlements is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and in the RVAA provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. With regard to visual receptors within settlements, none have been assessed as experiencing significant adverse effects. With regard to individual properties, the residents of 4-7 Catherine Cottages, Bernwood Farm and Sion Hill Farm would experience significant visual effects during Year 1. By Year 10, residual significant

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		sensitivity and because the effects would be experienced over long durations.	effects would remain for just Bernwood Farm and Sion Hill Farm; their more elevated location is noted as a factor in this assessment.
7.1.49	CSAG (Page 320)	Comment requesting clarity on the sensitivity of LCA 5.7 Hogshaw Claylands given different categories given in the LVIA.	As set out in the detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4]** [APP-112] LCA 5.7 is assessed to be of medium/low sensitivity and is referred to as such throughout all reporting. Assessment of sensitivity within different LVIA are specific to each Proposed Development and small differences in assessment levels are not unexpected.
7.1.50	CSAG (Page 320)	Comment that it is not clear what differentiates LCA 5.7 from the mother LCT 5 (Medium – Low), and sister LCA 5.4 Twyford Vale (Low). Clarification requested.	This point has been addressed at **Ref. 7.1.3** above.
7.1.51	CSAG (Page 320)	Comment requesting assessments of effects on LCAs 7.1, 7.2 and 7.4 are added to the LVIA, and for levels of landscape value, susceptibility and sensitivity recorded in the same way as for other LCAs.	This point has been addressed at **Ref 7.1.5** above.
7.1.52	CSAG (Page 321)	Comment requesting clarity given it is unclear why LCA 7.3's level of sensitivity (Medium in the LVIA) is the same as that of LCA 9.1 Finemere Hill and 9.2 Quainton Hill, when large parts of these LCAs are within a designated AAL which is of higher value.	This point has been addressed at **Ref 7.1.6** above.
7.1.53	CSAG (Page 321)	Comment requesting clarity given it is unclear why the LVIA's highest level of landscape sensitivity within the study area is only Medium, ie LCT 9 Low Hills and Ridges, and LCAs 9.1 Finemere Hill and 9.2 Quainton Hill.	This point has been addressed at **Ref 7.1.7** above.
7.1.54	CSAG (Page 321)	Comment requesting the viewpoint from the Outer Aylesbury Ring long-distance trail is included in the future Accompanied Site Visit (ASI).	The Applicant notes that interested parties were able to comment on the **Applicant's Draft Itinerary for the Accompanied Site Inspection (ASI) [EN010158/APP/8.10]** [REP1-110] with any suggested locations and request to join the Accompanied Site Inspection at Deadline 2. Those comments will be taken into consideration by the Examining Authority when it decides the final itinerary for the Accompanied Site Inspection.
7.1.55	CSAG (Pages 321 and 322)	Comment requesting clarification on levels of adverse effects on character being lower than between Years 1 and 10 of operation, whereas they are often at their highest. Further comment that the overall level of effect should be reported and the period during which it would be experienced noted separately.	This point has been addressed at **Ref 7.1.13** above.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
7.1.56	CSAG (Pages 322)	Comment requesting the Applicant state the fabric's levels of landscape value and susceptibility to change in the LVIA.	This point has been addressed at **Ref 7.1.17** above.
7.1.57	CSAG (Pages 322)	Comment requesting the Applicant explain why the LVIA concludes that the landscape 'fabric' is of a higher level of sensitivity than the landscape character receptors.	This point has been addressed at **Ref 7.1.17** above.
7.1.58	CSAG (Pages 322)	Comment requesting the Applicant provides a summary of effects on receptors at each viewpoint identified.	A detailed analysis of the scale of effect for each viewpoint is provided in **ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113].** As noted on page 11 in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]:** "*Representative viewpoints are used in the LVIA as 'samples' on which to base judgements of the scale of change on visual receptors. The wider extent of the effect and its duration are not captured in the viewpoint analysis (as a viewpoint cannot capture these factors for an entire route or area). As duration and extent are necessary considerations in determining magnitude of effect, judgements concerning magnitude and significance are provided for visual receptors and not for representative viewpoints. The only exception to this rule would be a specific viewpoint – where people visiting that location to look at the view are assessed as a visual receptor group in its own right.*"
7.1.59	CSAG (Pages 322)	Comment requesting additional photomontages from viewpoints along PRoWs crossing the Site.	The Applicant disagrees that additional photomontages are required. As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** the locations for viewpoint photography and photomontages, including those crossing the Site, were agreed with Buckinghamshire Council Landscape Officers.
7.1.60	CSAG (Pages 322)	Comment stating that it would be helpful to know whether the LVIA's Moderate Adverse level of magnitude is an average, or only experienced at certain VPs	This point has been addressed at **Ref 7.1.35** above.
7.1.61	CSAG (Pages 322)	Comment requesting confirmation of whether conclusions on significant effects apply to the whole of a route or specific VPs (Bernwood Jubilee Way referenced as an example).	This point has been addressed at **Ref 7.1.35** above with Bernwood Jubilee Way referenced as an example.
7.1.62	CSAG (Pages 323)	Comment requesting clarification on whether equestrians' higher eye-level was accounted for in the Glint and Glare Assessment.	The eyeline of horse riders is higher than that of pedestrians or car drivers. However, the effects of glint and glare on bridleways have not been considered in the glint and glare assessment because no guidance currently exists to assess glint and glare effects on either horses or horse riders. It is also generally considered that significant effects upon riders are not possible. The British Horse Society '*Advice on Solar Farms near routes used by equestrians*' (2025) states that '*any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a*

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			bright day.' It also states that the British Horse Society '*has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses*.' The Applicant can confirm that an anti-reflective coating will be used on the solar panels to increase panel efficiency and reduce the potential for glint and glare.
		Good Design	
7.1.63	CSAG (Page 16, Para. 72)	Comment that many of the fields are bordered by woodland or include in-field trees and that, whilst these provide important habitat, these features also shade panelled areas creating pressures for removal.	Buffers around existing woodland areas are secured by the **Design Commitments [EN010158/APP/5.9.4]** to protect the woodland and allow wildlife corridors, and would be 30m from ancient woodland and existing statutory and locally designated wildlife sites, with 20m from all other woodland, including HS2 planting. There would be a further 5m buffer between the fence line and the edge of the Solar PV modules. This would minimise the potential for existing woodland to provide over-shading of the Solar PV modules. Existing individual trees would also be protected by avoiding development within their Root Protection Areas (RPAs), with the fence line located outside the RPA and the additional 5m before the start of the Solar PV modules, which would minimise the potential for overshading.
		Adequacy of the Assessments and Surveys	
7.1.64	CSAG (Page 91, Para. 2.4 and Page 148, Para. 9.2)	Comment noting general agreement with the Landscape and Visual Chapter's conclusions of significant effects with general comments in disagreement with the levels of such effects, including their extent and duration, have been underestimated, and beneficial effects have been overstated.	The Applicant notes the agreement with the LVIA's conclusions regarding significant effects. The Applicant disagrees with the comment regarding under assessment of magnitude and maintains that the analysis as set out in **Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** follows best practice as set out in relevant guidance document. The point regarding beneficial effects has been addressed at **Ref 7.1.17** above.
7.1.65	CSAG (Page 96 and 97, Paras. 4.1.17, 4.1.18 and 4.1.19)	Comment noting agreement that there are distinct differences between the three host Landscape Character Types (LTCs), though there is raised disagreement with the Landscape and Visual Chapter's ascribing of levels of sensitivity. Further comment noting that the sensitivity levels have been underestimated and that Buckinghamshire Council agrees with this judgement.	Differences in sensitivity levels of LCT/LCA have been addressed at **Refs. 7.1.13, 7.1.15 to 7.1.17** above.
7.1.66	CSAG (Page 98, Paras. 4.2.8 and 4.2.9)	Comment noting that the Landscape and Visual Chapter fails to recognise that LCA 5.6 forms part of the setting for nationally significant heritage assets (notably the Grade I Winslow Hall, which is intervisible with the Site). Further comment noting that the Chapter therefore understates potential effects on such assets. Further comment that the Chapter fails to identify the Grade II* Church of St	This point has been addressed at **Ref. 7.1.12** above.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Lawrence and Winslow Conservation Area which are listed in LCA 5.6's profile.	
7.1.67	CSAG (Page 102 and 103, Paras. 4.3.6 and 4.3.7 and Page 112, Para. 5.4.8)	Comment noting that it is not clear whether the Claydon House and Park factored in the Landscape and Visual Chapter's judgement of sensitivity. Further comment requesting clarification of how and if the Claydon House and Park factored in sensitivity analysis of other parts of LCA 7.3	Claydon House and Park have been included as a factor affecting the landscape value of LCA 7.3 as set out in the detailed assessment of landscape sensitivity in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4]** [APP-112].
7.1.68	CSAG (Page 103, Paras. 4.4.3)	Comment noting that the Landscape and Visual Chapter does not differentiate between the areas of LCT 9 which fall within and beyond the AAL.	This point has been addressed at **Ref. 7.1.7** above.
7.1.69	CSAG (Page 95, Paras. 4.1.4, 4.1.5 and 4.1.6 and Page 103, Para. 4.4.5 and Page 108, Para 5.2.2 and Page 153, Para. S1.24)	Comment that the Landscape and Visual Chapter's use of a three point 'landscape susceptibility to change and sensitivity' approach is too blunt a tool for granular analysis and that a five point scale ranging from Very High to Very Low, with split categories, is much better. Further comment in Paras. 4.1.5 and 4.1.6 provide examples of why the three point system is considered a blunt tool.	The Applicant disagrees with the comment and maintains that a detailed review of sensitivity, informed by susceptibility and value tables, is provided for each relevant landscape character area as set out in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4]** [APP-112]. This fine-grained study of landscape sensitivity follows the principles set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, and the Technical Guidance Note 02-21 - Assessing Landscape Value Outside National Designations, both published by the Landscape Institute.
7.1.70	CSAG (Page 95, Paras. 4.1.7 and 4.1.8)	Comment that ES Volume 4 Appendix 10:3: Landscape Sensitivity Appraisal should replace 'sensitivity' with 'value' and that 'susceptibility to change' ought to factor as the level of sensitivity is derived from sensitivity and susceptibility to change.	The Applicant considers that this comment appears to stem from a mis-reading of the table headings. The reference to sensitivity in the primary table heading identifies that the overall purpose of this table is to provide a judgement on sensitivity. Sub-headings at the start of each section then identify whether the table is judging value or susceptibility as illustrated below for value: Table A10.3.1: Landscape Sensitivity Appraisal for LCA 5.6: Claydon Valley Host Landscape: LCA 5.6 – Claydon Valley Factors affecting sensitivity / Indicators of Lower Sensitivity to Solar PV development / Indicators of Higher Sensitivity to Solar PV development / Explanation **Value attached to Landscape**
7.1.71	CSAG (Page 105, Paras. 4.5.2 and 4.5.3)	Overarching comment that the CSAG believe the stated levels of sensitivity within the Landscape and Visual Chapter ought to be raised. Specific examples are given in Paragraph 4.5.3 on Page 105 of CSAG's WR.	Sensitivity levels of LCT/LCA have been addressed at **Refs. 7.1.13, 7.1.15 to 7.1.17** above.
7.1.72	CSAG (Page 108 and 109, Paras. 5.2.3 and 5.2.5)	Comment that the four point scale in Table 10.8 of the Landscape and Visual Chapter means that a moderate effect is not in the middle of the effects range and that an	The methodology for the assessment is clearly set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110] and the Applicant maintains that this approach is consistent with best practice guidance as set out in

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		odd numbered scale ought to be used. Further comment that the four point scale means that there is only one full-step category that is significant and two that are non-significant with the moderate level being subject to professional judgement. Further comment that the moderate level ought to attract a significant weighting, with professional judgement applied to determine whether a Moderate - Minor effect is significant or not.	the Guidelines for Landscape and Visual Impact Assessment, Third Edition, and the Technical Guidance Note 02-21 - Assessing Landscape Value Outside National Designations, both published by the Landscape Institute. As has been used in the Applicant's LVIA, these guidance documents confirm that, "*Word scales with ideally three or four but a maximum of five categories, are preferred as the means of summarising judgements for each contributing criteria."* As identified in the guidance (GLVIA3 para 3.34) it is noted that for a four-point scale: "*Descriptions should be provided for each of the categories to make clear what they mean, as well as clear explanation of which categories are considered to be significant and which are not."* The key is to provide a clear and consistent approach to identifying which effects are significant or not and it is not necessary to establish a specific threshold of significance at a median point, such as between minor and moderate.
7.1.73	CSAG (Page 109, Para. 5.2.6)	Comment requesting the Applicant to confirm why the approach in Table 10.8 of the Landscape and Visual Chapter was adopted and whether this skews the results of the assessment	The Applicant does not acknowledge any inconsistency in the combination of factors to produce an overall level of effect Table 10.8 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The same Table 10.8 has been used in the Springwell Solar DCO, (EN010149) consented in April 2026 and forms part of a consistent approach to assessment. For instance, combining a slight magnitude with a high sensitivity would result in a moderate effect, whilst combining a substantial magnitude with a low sensitivity would likewise result in a moderate effect. It is acknowledged that the column referencing negligible magnitude of effects provides a further, lower category of effects. However, this is not unexpected and does not skew results as this low level of categorisation is primarily used to filter out those aspects of the assessment where likely significant effects are least likely to occur. This can be seen in the Table 10.14 summary in the LVIA where relatively few effects are identified as minor/negligible and only two receptors are assessed as receiving negligible effects.
7.1.74	CSAG (Page 109, Para. 5.2.7 and Page 114, Para. 5.6.3 and Page 154, Para. S1.31)	Comment noting surprise that the Landscape and Visual Chapter has adopted Years 1 and 10 as the operation (including maintenance) phase assessment lens, clarity is sought on this approach. Further comment noting that, for such projects, Year 15 is the norm, with 25 years being preferred by some ExA's. Further comment noting disagreement with the Applicant's assessment that mitigation planting would have become effective visual screening by Year 10.	As set out at RR-049, Year 10, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** a Year 10 establishment for mitigation measures is based on the assumptions for plant growth as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** It is considered that hedgerow heights generally greater than 3m would not further reduce residual effects. Whilst it is acknowledged that proposed planting, notably tree planting, would continue to grow in height over the 40-year life of the Proposed Development, a further 5 years of tree growth would not further reduce residual effects. As noted in the **Outline LEMP [EN010158/APP/7.6.3]** early planting would provide additional time for establishment and restocking where proposed planting is particularly strategic in developing mitigation screening. It is acknowledged that by Year 10, particularly in winter, a 3m height hedgerow would not be suitably dense to afford year-round screening and this has been taken into account in the preparation of photomontages (showing winter views) and in the assessment of effects at Year 10.
7.1.75	CSAG (Page 111, Paras. 5.2.28 – 5.2.29 and Page 148,	Comment noting that the Landscape and Visual Chapter fails to account for the causes and nature of many	The Applicant disagrees that the LVIA provides a limited analysis of non-visual aspects of amenity, albeit no specific examples of omissions are given by the CSAG. As described in **ES**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
	Para. 9.3, Pages 152 and 153, Para. S1.10 – S1.1.13)	Proposed Development related impacts, leading it to underestimate adverse effects on landscape character and associated views. Further comment providing examples such as: • Little consideration of natural and cultural heritage; • Lack of identification of critical landscape and visual functions; • Lack of analysis of aesthetic and perceptual qualities; and • No analysis of glint and glare impacts.	**Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** the assessment of landscape value takes into account factors related to natural and cultural heritage (for example ecological, geological or heritage matters), landscape condition, cultural associations (in terms of connections with people, arts or events), distinctiveness (i.e. a sense of unique identity in the landscape), recreational opportunities, perceptual aspects (including scenic quality, wildness and tranquillity) and landscapes with a clearly identifiable role or function. The potential for glint and glare effects on local residents have been addressed with regards to PRoWs and dwellings in Sections 8.2 and 9.4 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082].** No significant residual effects are identified. It should also be noted that **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has considered potential impacts on biodiversity from reflected polarised light and no significant impacts have been identified.
7.1.76	CSAG (Page 112, Paras. 5.4.1, 5.4.2, 5.4.6 and 5.4.7)	Comment noting that the Landscape and Visual Chapter is not clear in how it differentiates direct and indirect effects on character. Further comment that the indirect effects on LCTs and LCAs should be a degree higher than as it is report in the Chapter. Further comment that the highest level of indirect effect on LCA 9.1 which sits within the AAL should sit between moderate - major and moderate adverse (significant).	Host landscapes which would experience direct effects are clearly identified in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** whilst **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** clearly identifies whether effects would be direct or indirect on each LCT/LCA. The comment that Table 10.14 does not make this explicit is incorrect as a key is provided at the start of the table. Sensitivity levels of LCT/LCA have been addressed at **Refs. 7.1.13, 7.1.15 to 7.1.17** above.
7.1.77	CSAG (Page 112, Paras. 5.4.3)	Comment disagreeing with the Landscape and Visual Chapter's conclusion that the high (significant) levels of direct adverse effects that would occur throughout the Proposed Development's operation (including maintenance) phase 'would quickly diminish to small and negligible outside of Parcel 2', and that 'any effects on landscape character beyond this tract of LCA 9.1: Finemere Hill would be not significant'.	A detailed description of effects on landscape character during the operation (including maintenance) phase within LCA 9.1 is provided on pages 147-149 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. As presented in the LVIA, effects diminish quickly outside of this part of Parcel 2 due to screening by intervening topography and mature woodland. This effect is illustrated on Figure 10.9c in **ES Volume 3, Figure 10.7d: ZTV of Solar PV Modules Parcel 3 – Bare Earth [EN010158/APP/6.3] [APP-069]** and viewpoint visualisations 16 and 17 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-117]**.
7.1.78	CSAG (Page 114, Para. 5.6.7)	Comment that landscape 'fabric' is the same as landscape 'elements' and, in accordance with the GLVIA3 glossary, watercourses ought to be included.	There are relatively few surface water features within the Order Limits as illustrated in **ES Volume 3, Figure 10.2: Topography and Land Cover [EN010158/APP/6.3] [APP-069]**. Surface water features noted in the descriptions of the LCT/LCA as, aquatic habitats associated with brooks, are included in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** as features of Natural Heritage and/or Functional value.
7.1.79	CSAG (Page 130 and 131, Paras. 7.3.11 and 7.3.13 and Page 141, Paras. 7.4.1 and 7.4.2)	Comment noting that 11 of the 42 viewpoints have photomontages which illustrate the Proposed Development during the operation (including maintenance) phase but that only three of these are from the Site's periphery and none are taken from within the	As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** the locations for viewpoint photography and photomontages were agreed with Buckinghamshire Council Landscape Officers. Photomontages for Viewpoints 1, 9 and 18 illustrate views from the periphery of the Order Limits whilst two photomontages for Viewpoint 11 illustrate views from the Bernwood Jubilee Way

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Site. Further comment requesting additional photomontages from along PRoWs that cross the Site should be produced. Further comment noting the Chapter does not report or summarise effects on receptors at each identified viewpoint but instead assesses effects on views along the roads and PRoWs where those viewpoints are located, with visual receptors on each route categorised into 'receptor groups'.	within the Order Limits. In addition, visualisations 15, 19, 25 and 42 illustrate additional views to within the Order Limit. The point regarding assessment of effects at each viewpoint has been addressed at **Ref 7.1.58** above.
7.1.80	CSAG (Page 132, Paras. 7.3.15 and 7.3.16)	Comment noting disagreement with the Landscape and Visual Chapter's criteria for visual receptor susceptibility, as set out in Paragraph 2.5.2 of the Chapter. Further comment noting it includes value factors which should be separate considerations. Further comment that the Chapter does not appear to recognise the difference in approach required to assesses visual effects and character.	The factors influencing landscape value and susceptibility are clearly identified in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112],** whilst those affecting visual sensitivity are set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The Applicant disagrees that paragraph 2.5.2 **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** conflates value and susceptibility for visual receptors. As per GLVIA3 para. 6.33, the methodology clearly identifies that it is the degree of appreciation or focus on views that is material to defining the level of susceptibility and not the value of the view itself. For instance, visual receptors would have a high appreciation of views from a local picnic area or beauty spot, but the value of either could range from community to national.
7.1.81	CSAG (Page 132, Para. 7.3.18)	Comment noting disagreement with the conclusion that all road users have a medium sensitivity and that a medium rating means higher sensitivity users may experience higher levels of adverse visual effects.	The Applicant disagrees that users of public roads should be assigned a high level of visual sensitivity. Their potential recreational use has not been discounted, however, as is most often the case where the local road network is primarily used for vehicle journeys, their susceptibility has been judged to fall between the most and least susceptible receptors as per para. 6.33 of GLVIA3.
7.1.82	CSAG (Page 135, Paras. 7.3.29 and 7.3.30)	Comment noting that the Landscape and Visual Chapter does not make clear whether the effects reported at Year 10 of operation would be during winter or summer. Further comment requesting clarification and that winter scenarios are used to reflect the worst-case.	The worst-case winter scenario is set out, where relevant, in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and the Applicant can confirm that it is this scenario which is assessed at Year 1 and Year 10; hence new hedgerow planting is not assumed to fully screen views even where it is of sufficient height.
7.1.83	CSAG (Page 91, Para. 2.7)	Comment that the Landscape and Visual Chapter does not adequately consider or assess effects on recreational/social amenity, nor does it appear to have considered glint and glare effects.	The Applicant has undertaken a detailed assessment of landscape and visual effects on recreational receptors within the study area as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** considers where connectivity of recreational PRoW in terms of journey distance is changed as a result of the Proposed Development, in the context of replacement and alternative access during the construction, decommissioning and operation (including maintenance) phases. A further consideration was given where the Proposed Development affects existing (or provides new) strategically important

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			links identified by policy, designation, stakeholder feedback or where there are substantively new routes that provide an improvement to the network in-line with wider plans and policies. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** assesses effects related to users of PRoW as follows: • Severance of communities (for example, as a result of changes in traffic flows on roads crossed by PRoW); • Pedestrian delay (for example, where this relates to changes in traffic flows interacting with paths used by walkers, cyclists and horse riders); • Non-motorised user amenity (for example, where users of the highway including walkers, cyclists and horse riders may experience change in journey time or amenity as a result of a change in traffic flows); and • Fear and intimidation (for example, where changes in traffic flow, heavy vehicle composition, the speed at which vehicles are passing and the proximity of traffic to people discourages walkers, cyclists and horse riders from using PRoW). **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** considers changes in environmental amenity relating to noise experienced by users of PRoW. The potential for glint and glare effects has been addressed **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]**. No significant residual effects are identified.
7.1.84	CSAG (Pages 92 and 93, Para. 3.5)	Comment noting that Para. 10.6.21 of the Landscape and Visual Chapter wrongly treats the product of receptor sensitivity and effect magnitude as the 'significance of effect', where it is their combination that yields the overall level of effect. Further comment that once the overall level of effect is established, judgements of significance are based on a pre-set significance threshold.	This confusion appears to have arisen from a similar wording used only once for the heading of section 10.6.21 and its related Table 10.8 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** The table titled, 'Significance of effect criteria' provides a tool to illustrate typical outcomes in combining sensitivity and magnitude. As set out in para 5(9) of TGN 02/21, it is stated that, once individual assessments of sensitivity and magnitude have been made "*…magnitude and sensitivity can then be combined to assess overall significance*." It should be further noted that at no point in the assessment of effects is the combining of sensitivity and magnitude referred to as the 'significance of effect'. The level at which effects are considered significant or not has been addressed at **Ref 7.1.58** above.
7.1.85	CSAG (Page 93, Para. 3.8 and Pages 120 and 121, Para. 6.28)	Comment noting that direct effects cannot be mitigated, while many indirect effects can be. Further comment noting that the Landscape and Visual Chapter does not adequately consider non-visual effects, including how the Proposed Development would affect blind and partially sighted people.	The Applicant notes the request to include the experience of blind and partially sighted people and understands this to mean the inclusion of primarily non-visual effects. These effects have been addressed at **Ref. 7.1.18** above.
7.1.86	CSAG (Page 111, Paras. 5.2.24 – 5.2.27)	Comment recognising that different elements of the Proposed Development will be temporary (but are assumed to be permanent for the purposes of the	As noted, the paragraph 2.5.11 in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** refers to effects lasting up to 40 years as long term. The Applicant therefore disagrees that effects during the 40-year operation

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Landscape and Visual Chapter) and other elements would remain post-decommissioning. Further comment noting that it is not considered that the Chapter has assessed effects on the basis of them being permanent. Comment requesting clarity on how effects on receptors (being either temporary or permanent in nature) affect the magnitude of effect and why landscape 'fabric' is assumed to be a permanent effect.	(including maintenance) phase should be described as permanent; the assessment at no point refers to such effects as permanent. Paragraphs 2.5.11 to 2.6.3 together with Plate A10.1 in the methodology describe how the duration of change is taken into consideration in the judgement of magnitude. Those elements of planting that could remain following decommissioning, and potentially for many decades to follow, are considered as having a permanent effect on landscape fabric.
7.1.87	CSAG (Page 129, Paras. 7.1.5)	Comment noting that the Landscape and Visual Chapter does not report or summarise effects on receptors at each identified viewpoint but instead assesses effects on views along the roads and PRoWs where those viewpoints are located. Further comment noting that no single plan showing the highlighted routes and viewpoints could be found and it is requested that the Applicant provides a consolidated plan.	The point regarding assessment of effects at each viewpoint has been addressed at **Ref. 7.1.58** above. Viewpoints locations are shown in **ES Volume 3, Figure 10.6: Viewpoint locations [EN010158/APP/6.3]** [APP-069] which uses an Ordnance Survey 'Pathfinder' for its base mapping. Should the reader require further clarification of receptors, these are available in **ES Volume 3, Figure 10.5a-d: Visual Receptors within 2km – Overview [EN010158/APP/6.3]** [APP-069].
7.1.88	CSAG (Page 129, Paras. 7.2.2 and 7.2.3)	Comment agreeing with the Landscape and Visual Chapter's conclusion that, at the majority of public viewpoints, significant adverse visual effects would be experienced across all phases of the Proposed Development. Disagreement in that the CSAG believe the levels of adverse visual effects have been underestimated.	This point has been addressed at **Ref. 7.1.64** above.
7.1.89	CSAG (Page 133, Paras. 7.3.19 and 7.3.20)	Comment noting that people on horseback will have a higher eyeline than pedestrians and cycling and that there is disagreement with the Applicant's statement that hedgerow heights would mean that these users would all experience the same degrees of visibility.	As agreed with Buckinghamshire Council on page 10 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** the same viewpoints were used for all receptors using PRoW. With hedgerows considered as established to 3m by Year 10, there would be no increase in views for horse mounted riders over pedestrians. The British Horse Society states a standard height of 2.55m above ground for a mounted rider would not be sufficiently high for a rider to view over the 3m hedgerows.
7.1.90	CSAG (Page 142, Para. 7.4.12)	Comment requesting clarification from the Applicant as to whether the operation (including maintenance) phase major/moderate adverse effect on views from the Bernwood Jubilee Way applies to the whole route or from specific viewpoints.	This point has been addressed at **Ref. 7.1.35** above. In summary, the assessment has been undertaken for the section of trail where views are available within the study area and does not describe an effect upon its entire length.
7.1.91	CSAG (Page 135, 136 and 137, Paras. 7.3.36 – 7.3.41 and 7.3.44 and Page 149, Paras. 9.19 – 9.23)	Comment noting that the Landscape and Visual Chapter should assume that there is no screening of views by baseline vegetation coverage and that a bare earth model should be used to draw the worst-case scenario, in	As presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** each receptor is assessed at winter in Year 1 without consideration for the screening effects of mitigation planting. The Applicant assumes that this in line with the comment from CSAG in proposing the LVIA consider a worst-case scenario, when visibility is at its maximum following the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		accordance with GLVIA3. Further comment noting scenarios within which landscape planting might be felled and that existing short-lived coniferous forestry and broadleaved plantations may be felled. Further comment that it is still necessary to factor existing vegetation into assessment but the vegetations nature should be noted for its likely permanence.	autumn leaf fall; GLVIA3 does not advocate a theoretical scenario where even the potential screening effects of existing winter vegetation are removed. Consideration of a worst-case with regard to the future baseline, such as wholesale loss of existing mature vegetation due to climate change, are difficult to predict with any accuracy and the future baseline has been taken to be the same as the current baseline. Existing vegetation within the study area is well established and generally managed for longevity. The Applicant is not aware of any plans to fell areas of established woodland that would affect potential visibility of the Proposed Development and reiterates their position that the assessment assumptions with regard to views in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** are realistic and that, as per the assumptions regarding future baseline, it would be difficult to predict the potential for every unplanned eventuality.
7.1.92	CSAG (Page 143, Para. 7.5.2)	Comment noting that Table 10.14 in the Landscape and Visual Chapter describes major – moderate adverse effects at Bernwood Farm and Sion Hill Farm as being not significant. Comment requesting clarification to this.	The Applicant acknowledges that this is a typo and effects should be noted as significant; the LVIA has been updated accordingly at Deadline 2.
7.1.93	CSAG (Page 145, Para. 8.9)	Comment noting that the Applicant's Landscape and Visual Chapter does not appear to consider the effects of glint and glare on character or visual and other amenity, as glint and glare is not mentioned. Further comment noting that it appears the Landscape and Visual Assessment was undertaken first and then the Glint and Glare assessment was based from this Assessment.	The potential for glint and glare effects on local residents have been addressed with regards to PRoWs and dwellings in Sections 8.2 and 9.4 of **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082].** No significant residual effects are identified hence glint and glare has not been considered further in the LVIA.
7.1.94	CSAG (Page 320)	Comment requesting clarity given it is not clear whether the sensitivity judgements factored in that Claydon House and Park and associated landscapes of higher value and susceptibility than other parts of LCA 7.3.	As presented in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112]** the cultural heritage value of Claydon House and Park is one factor in the assessment of a regional value for LCA 7.3. A separate sensitivity has not been applied to the landscape of the park as it has not been separately assessed in the LVIA, but is assessed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]**.
7.1.95	CSAG (Page 321)	Comment requesting the Applicant explain their approach to adopting split categories in some parts of LVIA Table 10.8 but not others. Further comment requesting consistency, and that the table title should be 'level' and not 'significance' of effect.	This point regarding categorisation of effects has been addressed at **Ref. 7.1.73** above. The second point regarding the title of Table 10.8 is addressed at **Ref. 7.1.84** above.
7.1.96	CSAG (Page 321)	Comment disagreeing with the approach in the LVIA to report levels of operational effects on landscape character at Years 1 and 10, suggesting that Year 15 is the norm for projects such as this for hedges at least and noting that	This point has been addressed at **Ref. 7.1.74** above.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		for woodland some Examining Authorities have preferred 25 years.	
7.1.97	CSAG (Page 321)	Comment requesting clarity on whether the LVIA has actually assessed effects on the basis of them being 'permanent'.	This point has been addressed at **Ref. 7.1.86** above.

Table 7-2: Landscape and Visual (including Design) (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Landscape Character	
7.2.1	Hogshaw Farm & Wildlife Park LTD (Summary, Page 1)	Comment noting concerns on the wider impact on the rural and natural setting of Hogshaw Farm & Wildlife Park which is an ecologically rich and sensitive landscape.	The Applicant has acknowledged in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** that there would be significant landscape effects to LCA 5.7 and LCA 9.1 within which Hogshaw Farm & Wildlife Park sits.
7.2.2	Hogshaw Farm & Wildlife Park LTD (Biodiversity and Conservation Identity, Page 7)	Comment that the Proposed Development has an industrial character that will conflict the ecologically rich landscape and conservation story of Hogshaw Farm & Wildlife Park.	This point has been addressed at **Ref. 7.1.11** above.
7.2.3	Grendon Underwood Parish Council (Page 2)	Comment noting the significant loss of open countryside which would result in harmful effects on the character of this area. Further comment that the landscape would be harmed contrary to local policies.	The Applicant recognises the concerns regarding the impact on rural setting and has undertaken a detailed landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. It is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development resulting in some significant adverse effects on landscape character. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site. Table 6 of the Policy Compliance Assessment Tables at **Appendix 4** to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] provides an assessment of the Proposed Development against the relevant planning policies in the Vale of Aylesbury Local Plan 2013-2033 and concludes that the Proposed Development is compliant with these policies.
		Effects on Visual Amenity	
7.2.4	Hogshaw Farm & Wildlife Park LTD (Summary of the Applicant's Assessment, Page 4)	Comment noting that despite acknowledgement of moderate adverse visual effects on Hogshaw Farm & Wildlife Park, there is no site-specific analysis of the impact on the business and that the significant visual impact will have a longer term impact on the viability of the business.	The assessment set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** concludes that it is likely that some tourist sector receptors (e.g. local recreational attractions including Hogshaw Farm and Wildlife Park) would experience significant effects on visual amenity, but there would be no other significant environmental effects, and no change in land or access to land used by Hogshaw Farm and Wildlife Park. An assessment of the potential for change to business viability (including driven by access and environmental amenity) has been undertaken within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** where there may be the potential to affect the viability of businesses as a result of significant changes Effects are limited geographically and not significant, with the exception of moderate adverse effects relating to visual amenity at Hogshaw Farm and Wildlife Park. By way of mitigation, all of the hedgerows would be retained as per design principles C7 and D1 of the **Design Commitments [EN010158/APP/5.9.4]**. Appendix 2C Landscape and Ecological Mitigation and Enhancements - Parcel 2 of the **Outline LEMP [EN010158/APP/7.6.3]** indicates an area of 'potential to provide ecological enhancement/ screening through provision of tree belts or

			woodland blocks' along the field boundary to the south of Fields D8, D9, D19 and D26. In addition, paragraph 5.2.16 of the **Outline LEMP [EN010158/APP/7.6.3]** requires a detailed survey of all hedgerows within the Order Limits and identifies lengths of hedgerow which require infilling of gaps or increasing in density to provide a reasonable degree of screening to mitigate the visual effects of the Proposed Development. Mitigation has therefore been applied to reduce the significance of effects as far as reasonably practicable, and it is not considered that following the application of mitigation, the Proposed Development would~~this would~~ affect the viability of the business concerned given its diverse attraction and business model.
7.2.5	Hogshaw Farm & Wildlife Park LTD (Battery Energy Storage Systems, Page 6)	Comment noting that the Landscape and Visual assessment records that views of activity associated with BESS in Fields D8 and D9 may be experienced from parts of the attraction.	The Applicant can confirm that this observation is as reported in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and has been factored into the assessment of effects.
7.2.6	National Trust (Landscape and Visual Impact, Page 1)	Comment noting that there would be a moderate/minor adverse effect on views from the PRoW MCL/10/2 at Claydon during the construction phase.	The Applicant can confirm that this observation is as reported in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].**
7.2.7	Grendon Underwood Parish Council (Page 2)	Comment noting the significant loss of open countryside which would result in adverse landscape and visual impacts. Further comment on views being spoiled.	This point has been addressed at line 8.2.3 above.
7.2.8	Grendon Underwood Parish Council (Page 2)	Comment that the Proposed Development would be intrusive and highly visible from a large number of nearby heritage assets such as Claydon House.	The Applicant has undertaken assessment for people using PRoW within visitor assets in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and it is acknowledged that this would result in significant visual effects for users of Bridleway MCL/17/1 to Claydon House and Park.
7.2.9	East Claydon Parish Council (Page 2, Para. 7)	Comment noting that the Solar PV modules would be visible for many residents from their homes and gardens, and to anyone driving into and through villages or visiting local attractions and businesses.	The Applicant has undertaken a detailed assessment of visual effects in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** and it is noted that no users of local roads or residents of nearby settlements would experience significant visual effects. As described in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** development free buffers have been increased resulting in reduced visibility of the Proposed Development from settlement/residential receptors. These measures, together with the management and reinforcement of existing green infrastructure, as described in the **Outline LEMP [EN010158/APP/7.6.3],** have enabled the majority of potentially significant effects to residential receptors to be mitigated. Significant visual effects would be limited to two private residencies the users of PRoW within two local visitor attractions for the operation (including maintenance) phase of the Proposed Development.
Adequacy of the Assessments and Surveys			

7.2.10	Hogshaw Farm & Wildlife Park LTD (Nature of the Business, Page 3)	Comment noting difficulty in understanding the level of sensitivity of the Proposed Development on the landscape and business when their previous application to enlarge the onsite café was refused given the landscape impact.	The point relating to landscape sensitivity has been addressed at **Ref. 8.1.3** above. The Applicant notes this comment and wishes to clarify that the decision-maker in what the Applicant assumes to be the referenced '22/00562/APP' planning application was Buckinghamshire Council. Since the Proposed Development is a Nationally Significant Infrastructure Project and is applying for permission via a DCO, the SoS is responsible for determining whether to grant a DCO for the Proposed Development, not Buckinghamshire Council.
7.2.11	Hogshaw Farm & Wildlife Park LTD (Summary, Page 1)	Comment noting that the Applicant's assessment of visual amenity does not properly assess how visual impacts would affect the business and stating that no weight is given to the likely effects on visitor behaviour, numbers, educational visits, or the wider attractiveness of the Park.	Effects on the value and volume of the tourist economy and its components are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** in accordance with NPS EN-1 (2023). The Applicant recognises that there are residual significant adverse landscape and visual effects on one receptor within the tourist economy - 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 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 business concerned given their diverse attraction and business model.
7.2.12	Hogshaw Farm & Wildlife Park LTD (Summary of the Applicant's Assessment, Page 4)	Comment noting that other receptors in the area such as Claydon House received more detailed visualisation and design-focused consideration within the ES, but Hogshaw Farm & Wildlife Park was not afforded equivalent business-specific analysis of consequences of impacts to visual amenity.	The Applicant considers that the Type 1 visualisation in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116]**, which illustrates the outline of the Proposed Development on the panoramic photograph at Viewpoint 43a and 43b from within Hogshaw Farm & Wildlife Park, is sufficient for the assessment of views.
7.2.13	Hogshaw Farm & Wildlife Park LTD (Conclusion, Page 9)	Comment noting that the Applicant does not provide meaningful business-specific analysis on how operation of the business will be impacted despite recognising significant adverse visual effects.	In the case of Hogshaw Farm and Wildlife Park, as set out at **Ref. 7.2.4** above, a substantial woodland tree buffer is proposed to the eastern boundary of Fields D8, D9, D19 and D26. An assessment of the potential for change to business viability (including driven by access and environmental amenity) has also been undertaken where there may be the potential to affect the viability of businesses as a result of significant changes. These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity at Hogshaw Farm and Wildlife Park. Mitigation has been applied to reduce the significance of these effects as far as reasonably practicable, and it is not considered that this would affect the viability of the businesses concerned given their diverse attraction and business model. During the pre-application stage, consultation feedback was sought and considered, resulting in the evolution of design changes and embedded mitigation measures which are proposed to limit adverse effects.

Table 7-3: Landscape and Visual (including Design) (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Effects on Landscape Character	
7.3.1	REP1-120, REP1-137, REP1-141, REP1-143, REP1-145, REP1-146, REP1-150, REP1-152, REP1-154, REP1-159, REP1-165, REP1-166, REP1-168, REP1-169, REP1-175, REP1-187, REP1-188, REP1-189, REP1-191, REP1-193, REP1-197, REP1-201, REP1-202, REP1-204, REP1-209, REP1-212, REP1-213, REP1-217, REP1-219, REP1-222, REP1-225, REP1-229, REP1-233, REP1-234, REP1-236, REP1-240, REP1-244, REP1-246, REP1-247, REP1-249, REP1-250, REP1-253, REP1-254, REP1-257, REP1-259, REP1-262, REP1-263, REP1-265, REP1-267, REP1-269, REP1-271, REP1-273, REP1-279, REP1-282, REP1-284, REP1-289, REP1-293, REP1-297, REP1-298, REP1-300	**Impact on landscape character** Comment that the Proposed Development would industrialise the rural character of the local area.	The Applicant reiterates their position as set out at RR-026, General Comment, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** that the Proposed Development would not result in the creation of an industrialised landscape. Whilst it is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development the Proposed Development would be underlain by a vegetative ground cover throughout the majority of the Site. Together with a substantial increase in hedgerow and tree planting, the Applicant does not consider that these changes would result in the industrialisation of the countryside.
7.3.2	REP1-297	**Impact on Aylesbury Vale** Comment that there would be a negative visual impact on views over the Vale of Aylesbury toward the Chilterns.	The assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** 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 LCA 9.1: Finemere Hill. However, the Applicant disagrees that this would extend to have an adverse effect on the wider Vale of Aylesbury extending towards the Chilterns. In terms of views, effects have been assessed as significant for the duration of the operation (including maintenance) phase from a section of the Swan's Way/Outer Aylesbury Ring from Quainton Hill and Conduit Hill. However, these views would be to the north and west of the viewer, rather than to the south in conjunction with views towards the Chilterns National Landscapes. As agreed with Buckinghamshire Council, the Chilterns was scoped out as it is situated over 18km to the south of the Order Limits and there would be no intervisibility at this distance.
7.3.3	REP1-139, REP1-146, REP1-182, REP1-186, REP1-286	**BESS** Comment that the BESS element of the Proposed Development would dominate the landscape.	The Applicant disagrees that the BESS would dominate the landscape. The BESS has been located in a lower lying, flatter area of the Site with strong existing field boundary vegetation resulting in generally reduced visual impacts, particularly for people with views from more elevated locations. The BESS and any security or acoustic fencing would be located at a distance no closer

Ref	WR	Summary Position	Applicant's Response
			than 50m from the nearest footpath users, with potential for further mitigation hedgerow planting as set out in the **Outline LEMP [EN010158/APP/7.6.3]**; any such detailed design is most appropriately dealt with at discharge of requirements stage, as it would depend on the detailed BESS design. In addition, a substantial woodland tree buffer is proposed to the southern boundary of Fields D8 and D9 and existing vegetation will be largely retained and managed to achieve taller heights, as set out in the **Outline LEMP [EN010158/APP/7.6.3]** to reduce visual impacts from the Proposed Development.
7.3.4	REP1-178, REP1-225, REP1-296, REP1-288	**Security infrastructure** Comment that the security measures embedded into the design of the Proposed Development such as CCTV and high fencing would have a negative visual impact.	There would be no permanent (continuous) lighting for security purposes except for at emergency exits. Security lighting would use infra-red which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.4]** and the **Outline CEMP [EN010158/APP/7.2.3]**. The CCTV technology type utilises infra-red and therefore Solar PV would not be continuously lit by visible lighting. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation (including maintenance) phases, the use of motion detection or manually operated lighting would be used to avoid constant lighting **Outline CEMP [EN010158/APP/7.2.3]**. Fencing to the perimeter of Solar PV development would be agricultural deer-proof fencing located at least 10m from footpaths which is not considered as incongruous in an agricultural setting. Perimeter fencing around other elements of the Proposed Development, such as the Rosefield Substation and BESS, would comprise metal palisade fencing or metal mesh with pulse monitoring. The effects of all such fencing, including the acoustic screen fencing, have been considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**.
7.3.5	REP1-225	**Security infrastructure** Comment that CCTV is inappropriate in a rural setting and will create a sense of monitoring that is incompatible with rural life.	This point has been addressed in **Ref. 7.3.4** above.
		Effects on Visual Amenity	
7.3.6	REP1-136, REP1-146, REP1-150, REP1-152, REP1-155, REP1-158, REP1-168, REP1-181, REP1-189, REP1-197, REP1-198, REP1-204, REP1-209, REP1-211, REP1-212, REP1-214, REP1-218, REP1-219, REP1-221, REP1-224, REP1-225, REP1-226, REP1-228, REP1-229, REP1-230, REP1-233, REP1-234, REP1-240, REP1-251, REP1-257,	**PRoW and permissive footpaths** Comment that there would be negative visual effects from footpaths which would affect their amenity and therefore their use. Specific references made to footpaths including: • Routes near Granborough • Bernwood Jubilee Way • Splash Lane • The route to Runt's Wood • Granborough via Sion Hill Farm	The experience of users of PRoW has been considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** During the construction phase, users of PRoW will experience: • Non-significant effects relating to visual amenity (negligible or minor/minor to moderate adverse) for seven PRoWs (including NCN Route No. 51, PRoW between Three Points Lane and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); and • Significant effects relating to visual amenity (moderate or moderate/major adverse) for six PRoW (including North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW

Ref	WR	Summary Position	Applicant's Response
	REP1-261, REP1-263, REP1-266, REP1-271, REP1-284, REP1-298, REP1-300	• Muxwell Farm to Botolph Claydon • Romer Wood • Claydon Lawn to Hogshaw to Quainton Hill • Sion Hill towards Granborough Road along the North Bucks Way • Fields and footpaths via Weir Lane • Footpath that eventually leads to Muxwell Farm. • Across the fields from Muxwell House to Claydon House, Middle Claydon and East Claydon • Runts Wood to Finmere House to Hogshaw Farm	between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3). Following the consideration of embedded mitigation, during the operational (including maintenance) phase, users of PRoW will experience: • Non-significant effects relating to visual amenity (negligible or minor/minor to moderate adverse) for eight PRoWs (including North Buckinghamshire Way/Midshires Way, NCN Route No. 51, PRoW between Three Points Lane and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon Road/Parcel 3 and Granborough/Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); and • Significant effects relating to visual amenity (moderate or moderate/major adverse) for five PRoW (including Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3).
7.3.7	REP1-159, REP1-181, REP1-184, REP1-256	**Dark skies** Comment that the Applicant asserts that sympathetic lighting schemes would be adopted, but the illuminated parts of the Proposed Development would be in prominent positions, seen from the ridge-top settlements around the Site and dark skies would be lost.	Please see response to **Ref. 7.3.4** above.
7.3.8	REP1-178, REP1-181, REP1-184, REP1-185, REP1-199, REP1-222, REP1-241, REP1-247, REP1-253, REP1-254, REP1-256, REP1-275, REP1-293, REP1-294	**Lighting** Comment that lighting would impact rural character of the local area during both construction and operation.	Please see response to **Ref. 7.3.4** above.
7.3.9	REP1-143, REP1-154, REP1-158, REP1-164, REP1-168, REP1-169, REP1-185, REP1-208, REP1-209, REP1-212, REP1-217, REP1-219, REP1-227, REP1-229, REP1-240, REP1-250, REP1-267, REP1-271, REP1-276, REP1-297	**General comment** Comment that there would be a negative visual impact from the Proposed Development.	The Applicant has acknowledged that there would be large-scale change to the landscape in the Order Limits as set out at RR-275, Landscape and visual, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** which would result in some significant adverse landscape and visual effects for the duration of operation. 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 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.
7.3.10	REP1-150, REP1-165, REP1-168, REP1-185, REP1-187, REP1-191, REP1-199, REP1-	**Residential properties**	A detailed assessment of visual effects on residential receptors/settlements is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and in the RVAA provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment**

Ref	WR	Summary Position	Applicant's Response
	203, REP1-218, REP1-235, REP1-263, REP1-269, REP1-272, REP1-282, REP1-290, REP1-300	Comment that there would be a negative impact on visual amenity from residential properties, including properties in Botolph Claydon.	**[EN010158/APP/6.4] [APP-114]**. With regard to visual receptors within settlements, none have been assessed as experiencing significant adverse effects. With regard to individual properties, the residents of 4-7 Catherine Cottages, Bernwood Farm and Sion Hill Farm would experience significant visual effects during Year 1. By Year 10, residual significant effects would remain for just Bernwood Farm and Sion Hill Farm.
7.3.11	REP1-168	**Mushroom Shelter** Comment that the Proposed Development would have a negative effect on views from the Mushroom Shelter.	The **ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113]** provides a detailed analysis of the scale of change that would be experienced at the Mushroom Shelter (viewpoint 40). This information is summarised in Table 10.12 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** as at most medium/small. The LVIA then provides a narrative description of how this receptor would experience the Proposed Development along with other receptors in Botolph Claydon (pages 106-107 and pages 158-160) which concludes that effects on views would be not significant.
7.3.12	REP1-185	**Impact on villages** Comment that the Applicant admits that 'Likely significant adverse visual effects on local settlements are anticipated on Steeple Claydon, Botolph Claydon and Granborough'.	Please see response to **Ref. 7.3.10** above.
7.3.13	REP1-282	**Roads** Comment that the Proposed Development will be highly visible from local visitor attractions.	As set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** it is acknowledged that Claydon House and Hogshaw Farm Wildlife Farm would experience moderate adverse effects which would be significant effects for the duration of the operational (including maintenance) phase of the Proposed Development. However, as set out in the **Outline LEMP [EN010158/APP/7.6.3]** the planting of additional avenue (poplar) trees along Three Points Lane, as agreed with National Trust, and illustrated in **ES Volume 4, Appendix 10.6: LVIA Visualisations Claydon House [EN010158/APP/6.4.3]**, would provide additional visual screening of the Proposed Development to the lower levels of Parcel 1, including the Satellite Collector Compound, whilst avoiding obstruction of the views towards Knowl Hill. In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting, as set out in the **Outline LEMP [EN010158/APP/7.6.3]**, in the form of a new 15m width belt of structural native woodland (early) planting along southern boundary of Fields D8, D9, D19 and D26, would provide some screening and filtering of views to the lower levels of the Proposed Development. Nevertheless, the Applicant acknowledges that the significant effects will remain for the duration of the operational (including maintenance) phase of the Proposed Development.
7.3.14	REP1-282	**Visitor attractions** Comment that the Proposed Development will be highly visible from local visitor attractions.	Please see response to **Ref. 7.3.14** above.
7.3.15	REP1-229, REP1-230	**Quainton Hill** Comment that there would be a negative visual impact on views to Quainton Hill.	As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018],** the Applicant has developed the design of the Proposed Development to protect wider views towards Quainton Hill where practicable. Along the Bernwood Jubilee Way this has included offsetting the Solar PV development by 55m, rather than 10m, to allow continued views over the Solar PV panels towards

Ref	WR	Summary Position	Applicant's Response
			Quainton Hill and its landscape context. This would minimise the potential visual effects on users of the footpath and ensure no views of towards Quainton Hill and its landscape context would be interrupted by the Proposed Development.
7.3.16	REP1-145, REP1-261	**Quainton Hill** Comment that there would be a negative visual impact on views from Quainton Hill.	The assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** acknowledges that significant effects would be experienced by walkers for the duration of the operation (including maintenance) phase from a section of the Swan's Way/Outer Aylesbury Ring on Quainton Hill.
7.3.17	REP-197	**Sion Hill** Comment that there would be a negative impact on views from Sion Hill across the valley towards Granborough, North Marston and Hogshaw	A detailed assessment of visual effects on residential receptors/settlements is included in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and in the RVAA provided in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**. The RVAA acknowledges that residents of Sion Hill Farm would experience major effects at Year 1 which would reduce to major/moderate at Year 10. However, these effects are not considered overbearing as they would be viewed at distances of at least 280m, retain undeveloped land between the property and the Proposed Development and would be viewed in the context of the existing large overhead lines and glimpses of the National Grid East Claydon Substation. Any views of the proposed National Grid East Claydon Substation Extension would be limited to oblique first floor views by intervening local topography, outbuildings and barns with no notable increase in the scale of change.
		The Adequacy of Landscape and Visual Mitigation	
7.3.18	REP1-173, REP1-224, REP1-274	**Adequacy of screening** Comment that proposed visual screening is inadequate, for reasons including the amount of time it will take screening to mature.	The Applicant has used a Year 10 establishment for mitigation measures based on the assumptions for plant growth as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** It is acknowledged that by Year 10, particularly in winter, a 3m height hedgerow would not be suitably dense to afford year-round screening and this has been taken into account in the preparation of photomontages (showing winter views) and in the assessment of effects at Year 10.
7.3.19	REP1-136, REP1-145, REP1-188	**Topography** Comment that the sloped topography of the Site makes the Proposed Development more visible from villages and not suitable for solar.	Please see response to **Ref. 7.1.1** above.
7.3.20	REP1-154	**Principle** Comment that the visual effects of the Proposed Development cannot be mitigated.	The Applicant reiterates their position as set at RR-049, Direct impacts, of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors through the process of design development. Nevertheless, the assessment in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** reports that there would be a number of significant adverse landscape and visual effects. It is acknowledged that residual effects cannot always be mitigated and such residual effects will be weighed in the planning balance.

Ref	WR	Summary Position	Applicant's Response
7.3.21	REP1-146, REP1-173	**Impact of screening** Comment that mitigation measures would interrupt and fragment open views which are currently enjoyed. Specific reference to screening of views along Bernwood Jubilee Way.	Please see response to **Ref. 7.3.13** above.
		Good Design	
7.3.22	REP1-203, REP1-274, REP1-272, REP1-290	**Proximity to homes** Comment that the solar panels are too close to residential properties.	All of the residential properties in the vicinity of the Proposed Development have been considered when designing the Proposed Development. Areas were removed from the Order Limits following Stage One Consultation to move the Proposed Development further from Botolph Claydon, as described in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** considered each residential property within 200m of any Solar PV modules; 400m of any siting zones for structures up to 6m (i.e. Satellite Collector Compounds, Main Collector Compound and BESS); and 800m from any siting zones for structures up to 15m (i.e. Rosefield Substation). Many of these properties were visited, as described in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]**, and bespoke offsets from properties were designed to respond to the outlook from the properties and reduce visual impacts for the properties.
7.3.23	REP1-159	**Good design** Comment that the Proposed Development does not meet the standards for good design set out in EN-1.	The Applicant disagrees that the Proposed Development does not meet the standards for good design set out in NPS EN-1 (2023). The **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** sets out the design approach taken to the Proposed Development, including the vision and design principles established at the outset of the Proposed Development, how the design applies the design principles and how the design complies with the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design. **Appendix 4: Policy Compliance Assessment Tables** of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out how the Proposed Development complies with the standards for good design set out in NPS EN-1 (2023).
7.3.24	REP1-274	**Design evolution** Changes during pre-application consultation demonstrate that the development could operate at a smaller scale without affecting the homes surrounding East Claydon and Botolph Claydon. There is no clear need to cover all the fields behind these villages with solar panels.	As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the design of the Proposed Development has evolved from the initial Stage One Consultation to take account of many factors, including consultation feedback, results from environmental surveys, updated technical information, targeted engagement with statutory consultees and stakeholders, technical design workshops and increasing input from National Grid on the National Grid East Claydon Substation. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location.

Ref	WR	Summary Position	Applicant's Response
7.3.25	REP1-274	**BESS location** Comment that there is no need to position the BESS facility by East or Botolph Claydon.	Sections 6.11 and 7.9 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** set out how need for BESS and the benefits of including BESS within the Proposed Development, as supported by the Clean Power 2030 and NPS EN-3 (2023). NPS EN-3 (2023) states that the government is supportive of solar that is collocated with other functions (for example, storage) to maximise the efficiency of land use (Para 2.10.10). The proposed BESS will support the operation of the Proposed Development by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Proposed Development, being the level of carbon free energy sent to the grid, as explained in Section 7.9 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]**. As set out in the **Design Approach Document [EN010158/APP/5.8.2]** **[REP1-018]**, parts of Parcel 2 were initially identified as potential locations for the BESS for a variety of reasons, including but not limited to: • Close proximity to Claydon Road to facilitate access and avoid traffic passing through the local villages. • The scale and topography of the landscape. • Relatively few sensitive visual receptors, such as individual properties, settlements and PRoW, compared to other areas of the Site. Following the Stage Two Consultation, the **Design Approach Document [EN010158/APP/5.8.2]** **[REP1-018]** sets out the reasons for the option of BESS being removed from Parcel 3. These included feedback on the operation of existing tenants and views from Botolph Claydon and East Claydon.
7.3.26	REP1-150	**BESS location** Query why the proposed battery storage is located close to Hogshaw Farm and Wildlife Park and other residential properties, when alternative locations appear to exist that would have far less impact on residents and local businesses?	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 the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]**.
7.3.27	REP1-138, REP1-182, REP1-193, REP1-213, REP1-257, REP1-266, REP1-274	**BESS location** Comment that the BESS is proposed too close to residential properties and villages due to fire safety risks.	A site-specific **BESS Plume Assessment Summary [EN010158/APP/7.13.2]** **[REP1-098]** assessment has been carried out for the Proposed Development including atmospheric dispersion modelling and this was submitted at Deadline 1. This demonstrates that the risk to the population remains very low. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2]** **[REP1-098].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst-case scenario. The results of this assessment show no exceedances of any Acute Exposure

Ref	WR	Summary Position	Applicant's Response
			Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. As outlined in the Applicant's **Outline BSMP [EN010158/APP/7.9.3]**: *As a minimum, the battery system will have completed unit or installation level UL 9540A (5th Edition) testing (Ref), the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026 revision) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc.* The Applicant has engaged with Buckinghamshire Fire Authority throughout the pre-application phase to ensure that all Fire & Rescue Service emergency response requirements for the Scheme are fulfilled. Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.2]**. Buckinghamshire and Milton Keynes Fire Authority (BMKFA) intervention to a BESS incident, in worst case scenarios would typically be limited to boundary cooling of adjacent BESS units to prevent the fire from spreading. The fire would be allowed to burn out. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling: *provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.*
7.3.28	REP1-265	**Height** Comment that the height of the Proposed Development is unacceptable.	The maximum heights of all of the proposed infrastructure are outlined in **ES Volume 3, Figure 3.1: Height Parameters [EN010158/APP/6.3.2] [AS-021]** and secured in the **Design Commitments [EN010158/APP/5.9.4]**. The Solar PV modules and mounting structures would be no greater than 3.5m above ground level, except within flood areas where the height would be no greater than 4.5m. The heights of the Solar PV modules are determined by the standardly available panel dimensions from commercial suppliers of Solar PV modules, allowing for a tilt of between 10 to 30 degrees from horizontal to optimise daylight absorption, as shown in **ES Volume 3, Figure 3.2: Indicative Solar PV and String Inverter Cross-Sections [EN010158/APP/6.3] [APP-063]**. Main and Satellite Collector Compounds and the BESS would be no greater than 6m above ground level. The Rosefield Substation would be no greater in height than 15m above ground level.

Ref	WR	Summary Position	Applicant's Response
			The design of the Proposed Development has been informed by technical landscape and visual analysis. As set out in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047], alternative solar technologies such as tracker panels were discounted as a result of the technology's landscape and visual impacts due to the increased height in comparison to fixed panels. Further detail on the landscape and visual effects is presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and is supported by several figures presented in **ES Volume 3, Figure 10.1 – 10.26 [EN010158/APP/6.3]** [APP-069], including Zone of Theoretical Visibility (ZTV) analysis to show the extent of visibility for Solar PV with and without proposed mitigation planting. The assessment has been undertaken based on the worst-case scenario maximum heights and the actual heights of equipment will be confirmed at the Discharge of Requirement stage. Heights will be no higher than the maximum heights secured and are likely to be lower in many cases. The design also incorporates landscape planting to mitigate and screen views of the Proposed Development. The landscape planting proposals are detailed and secured in the **Outline LEMP [EN010158/APP/7.6.3].**
7.3.29	REP1-120, REP1-150, REP1-152, REP1-211, REP1-217, REP1-222, REP1-234, REP1-252, REP1-254, REP1-258, REP1-266, REP1-284, REP1-291, REP1-298, REP1-300	**Scale** Comments on the scale of the Proposed Development including that the Proposed Development is too large.	The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] sets out the reasoning for the Proposed Development, including its size and location. The Applicant is bringing forward the Proposed Development to support the government's aim to deliver a clean power system by 2030 and keep it clean beyond 2030 on the way to achieving its legally binding net zero target by 2050. The **Statement of Need [EN010158/APP/5.6]** [APP-036] provides further information on the urgent need for an unprecedented capacity of new solar schemes, including large-scale schemes for which there is a critical national priority (CNP) because of the decarbonisation, energy security, and affordability benefits that they deliver. The Statement of Need explains that, to deliver the government's 2035 FES-derived capacity range for solar generation (Clean Power 2030 Action Plan Annex (update), Table 1), the equivalent of approximately one project the size of this Proposed Development would need to be switched on each and every month (upper range) or every other month (lower range) between the end of 2024 and the middle of 2035. 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.
		Adequacy of the Assessments and Surveys	
7.3.30	REP1-192, .REP1-263	**Approach to assessment** The LVIA underplays the harm of the Proposed Development which would be visible from numerous	The Applicant disagrees with the comment and maintains that the methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4]** [APP-110] and the analysis, as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**, follows best practice as set out in the Guidelines

Ref	WR	Summary Position	Applicant's Response
		PRoWs, residential properties and the wider landscape for many miles.	for Landscape and Visual Impact Assessment, Third Edition, published by the Landscape Institute.
7.3.31	REP1-185	**Approach to assessment** Comment that the visual impact on properties situated cannot be adequately evaluated by a series of visualisations from selected fixed locations around the Site as landscape views are enjoyed also by moving within the area.	The Applicant agrees with this statement and can confirm that the overall assessment of effects for each receptor is not based solely on an assessment at each viewpoint. As set out on page 11 of **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** each viewpoint is used as a 'sample' on which to base judgements of the scale of change on visual receptors. As noted, a static view does not convey all of the information required to understand the magnitude of effect as the wider extent of the effect and its duration are not captured in the viewpoint analysis. Therefore, judgements concerning magnitude and significance are provided for visual receptors and not for representative viewpoints as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**.
7.3.32	REP1-225	**Visualisations** Comment that images of the Site do not accurately represent the area and/or the Proposed Development's potential visual impacts, as they minimise apparent height and massing, and do not reflect how a person standing at the landscape viewpoints would actually experience the view.	The preparation of the photomontage follows best practice guidance as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** illustrating effects at Year 1 (without mitigation) and Year 10 (with mitigation). It should be noted that, as illustrated in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-117],** the printing size of the image should be at paper size A1 width of 840mm.

Table 8-1: Noise and Vibration (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Receptors During Construction and Operation	
8.1.1	CSAG (Page 37, Para. 164)	Comment that the Applicant's assessment cannot rule out significant noise and vibration effects because the assessment is provisional and the proposed technology has not been identified and noise impacts from inverters and vibration impacts of piling are omitted altogether.	Within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040],** it is acknowledged that the noise emitting equipment will be refined as part of the detailed design, which introduces potential uncertainty to the assessment. This uncertainty is managed through the commitment within the **Draft DCO [EN010158/APP/3.1.4]** to achieve defined rating level limits at receptors. Rating levels account for the predicted noise level from the Proposed Development, plus any relevant rating penalties for acoustic characteristics such as tonality. Noise from BESS inverters have been accounted for as part of the assessment; they have not been omitted as suggested. Construction-induced vibration from the proposed piling works are not significant. Please refer to response to **Ref. 8.1.2** below.
8.1.2	CSAG (Page 248, Para. 2.2.6)	Comment noting that a vibration impact assessment has not been provided for piling which depending on piling methodology has the potential to generate high levels of vibration. Either an assessment of piling vibration impact or robust substantiation for omitting this assessment should be provided.	Piling works for the PV frames will be a highly transient activity, with each pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s peak particle velocity (PPV) criterion at the surrounding receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1200 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has the potential to be exceeded when works are taking place within approximately 50m of sensitive human receptors. The proposed piling works are not intended within this distance. If ground-borne vibration adversely affects livestock in adjacent fields, alternative rotary bored piling techniques could be adopted in specific locations, depending on the proximity of livestock and time of year. 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 and vibration levels, where appropriate. This is captured within the **Outline CEMP [EN010158/APP/7.2.3].**
8.1.3	CSAG (Page 250, Para. 3.1.3)	Comment noting that BS 4142 suggests that the highest rating noise level for operational noise to be classified as 'low' magnitude of impact should be equivalent to the existing background level whereas the criteria in Table 13.10 of Volume 2 Chapter 13: Noise and Vibration permits a level 5dB above the background level to be classified as 'low'.	BS 4142 provides three categories when describing potential impacts ("low", "adverse" and "significant adverse"). These are not directly interchangeable with the magnitude criteria within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** ("negligible", "low", "medium", "high"). BS 4142 identifies a potential significant adverse impact where the rating level is around 10dB above the background level, prior to the consideration of context such as the absolute level of sound. The assessment for the Proposed Development adopts a threshold of >5dB above the background level as potentially significant, prior to the consideration of context. This therefore represents a precautionary approach which provides a greater level of protection to residents.
8.1.4	CSAG (Pages 253 and 254, Paras. 3.2.4, 3.2.5 and 3.2.6)	Comment noting that the Noise Assessment mentions that inverters will be situated in the BESS compound but there is no reference or noise data provided in the assessment.	BESS inverters have been included as part of the operation (including maintenance) phase assessment set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		The considered sound data for the battery container and auxiliary transformer may be underestimated, and the absence of Inverter/PCS data may be a significant omission considering that this is typically a dominant noise source in BESS compounds.	**[REP1-040]**. The current design solution that has been used to inform the operation (including maintenance) phase noise assessment incorporates string inverters that are housed within the BESS generic containers, therefore, the noise emissions from BESS units incorporate noise contributions from the inverters. The approach taken by Environoise to derive sound power levels from the proposed equipment, for the purposes of a comparison with other similar developments, is based on an over-simplified assumption that the noise emitting equipment has been modelled as point sources. As noted in Table 13.8 of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, the noise emitting equipment has been modelled as 3D emitting objects, and as such, the resultant sound power levels are higher than the approximated values used by Environoise to inform the comparison. This demonstrates that the adopted values are appropriate.
8.1.5	CSAG (Page 254, Para. 3.2.7)	Comment noting that the BESS containers have been modelled with 'noise emitting from one side and one end' and with 'noise emitting faces orientated inwards'. It is typical for two sides to emit greater noise than the other two and roof due to discharging of cooling fans. However, the differential between the higher noise emitting sides, and lower noise emitting sides has not been confirmed. If the differential is less than 10dB then these sides should also be considered; particularly as these lower noise emitting sides are facing outwards, assumedly towards receptors in some instances.	This is noted. Based on the current design data, the noise from one side and one end are dominant.
8.1.6	CSAG (Page 254, Para. 3.3.2)	Comment noting that the residual noise levels at some of the receptors are very close to the adopted LOAEL limit, with predicted noise levels of 35dB(A) at two receptors and a total of eight receptors having noise levels of within 3dB of the limit (i.e. 32 - 35dB(A)). This does not consider the Statera Battery Energy Storage System development which is approved on land immediately adjacent to the north-east edge of the Proposed Development. As the aforementioned development is permitted, the assessment should consider the cumulative effects of the two developments operating simultaneously.	Cumulative noise effects are considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044]**, which includes the Statera Battery Energy Storage System. No exceedance of the LOAEL is predicted considering cumulative developments. No significant noise effects are predicted.
		The Adequacy of Mitigation	
8.1.7	CSAG (Page 249, Para. 2.4.1)	Comment noting that whilst a list of potential mitigation measures is proposed, the submitted material does not identify which mitigation measures are likely to be appropriate for specific construction noise sources and which receptors will benefit.	A range of mitigation measures have been presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and secured within the **Outline CEMP [EN010158/APP/7.2.3]** to address potential short-term significant adverse noise effects associated with the construction phase, at a limited number of receptors. The listed measures represent industry best practice and would be refined when a Principal Contractor is involved. At this stage, it is appropriate to identify potential mitigation measures that can be used to control noise levels so that significant adverse effects do not occur, however, the mitigation measures should not be fixed, so that the most effective solution can be adopted on a case-by-case basis.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
8.1.8	CSAG (Page 249, Paras 2.4.2 and 2.4.3)	Comment noting that in Volume 4 Appendix 13.2: Construction Noise Plant Tables and Results, calculations are not provided for the residual level of noise impact once mitigation is implemented. Furthermore, in Section 13.10.1 of Volume 2 Chapter 13: Noise and Vibration, the following is stated: 'By adopting the additional control measures outlined above, it is considered that noise levels from all construction activities would not exceed the daytime threshold criterion of 65dB LAeq,T at any of the receptors considered.' The lack of assigning construction noise mitigation measures to specific works and the omission of corresponding residual noise impact calculations prevents verification of this statement at this design stage within this review.	Please refer to response to the Applicant's response to **Ref. 8.1.7** above.
8.1.9	CSAG (Page 254, Para. 3.4.2)	Comment noting that a 5dB reduction at source is required for the main transformers through 'refinement of the engineering requirements'. This approach is vague and indicates that the LOAEL is not met with the current design. The design of the transformer, and other plant, the noise level of which has potentially been underestimated, needs to be developed further before targets can be demonstrated to be met.	The Applicant is satisfied that the lower transformer noise emissions are attainable and therefore appropriate for use in the assessment. A higher noise emission value for the transformers had initially been used to provide flexibility.
8.1.10	CSAG (Page 255, Para. 4.1.2)	Comment noting that it has not been demonstrated in the reports that noise from construction plant will achieve a 'negligible' or 'low' impact at all receptors once mitigation measures have been implemented. In lieu of this, the assessment demonstrates that without noise mitigation measures, the 'low' magnitude of impact threshold of 65dB LAeq,T will be exceeded by up to 10dB which is a 'medium' impact in accordance with the adopted criteria.	A range of mitigation measures have been presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** to address potential short-term significant adverse noise effects associated with the construction phase, at a limited number of receptors. The listed measures represent industry best practice and would be refined when a Principal Contractor is involved as part of the detailed Construction Environmental Management Plan(s). At this stage, it is appropriate to identify potential mitigation measures that can be used to control noise levels so that significant adverse effects do not occur, however, the mitigation measures should not be fixed, so that the most effective solution can be adopted on a case-by-case basis.
8.1.11	CSAG (page 320, Row 2)	Comment requesting assessment of potential risks of the development to TCS Biosciences, Hogshaw Wildlife Park, Claydon Park. This should include noise and vibration.	Please refer to the Applicant's responses provided below at **Ref. 8.1.12**, which address these receptors.
8.1.12	CSAG (page 323, Row 26)	Comment requesting either an assessment of piling vibration impact, or robust substantiation for omitting this assessment should be provided.	Piling works for the PV frames will be a highly transient activity, with each small pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s PPV criterion at the surrounding receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1200 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has the potential to be exceeded when works are taking place within approximately 50m of sensitive human receptors. The proposed piling works are not intended within this distance.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			If ground-borne vibration adversely affects livestock in adjacent fields, alternative rotary bored piling techniques could be adopted in specific locations, depending on the proximity of livestock and time of year. 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 and vibration levels, where appropriate. This is captured within the **Outline CEMP [EN010158/APP/7.2.3].**
8.1.13	CSAG (page 323, Row 28)	Comment that a contextual discussion regarding the character of proposed noise sources in relation to the existing noise environment has not been included.	Contextual factors have been accounted for as part of the significance criteria adopted for the noise assessment presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. This includes consideration of low baseline sound levels, the absolute level sound and the receptor facade insulation (open windows). The character and level of the residual sound has been compared to the character and level of the specific sound has been used to inform the application of rating corrections.
8.1.14	CSAG (page 323, Row 29)	Comment requesting details of mitigation measures as an unspecified measure for reducing transformer noise by 5dBA was included and is insufficient in demonstrating compliance with LOAEL targets.	The Applicant is satisfied that the lower transformer noise emissions are attainable and therefore appropriate for use in the assessment. A higher noise emission value had initially been used to provide flexibility.

Table 8-2: Noise and Vibration (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Receptors During Construction and Operation	
8.2.1	Hogshaw Farm & Wildlife Park LTD (Summary, Page 1)	Comment noting concern over BESS and associated infrastructure having an impact on the quiet rural spaces in the Park including the wildlife trail and areas which may be used for camping in the future. Further comment that the Applicant hasn't properly assessed how the loss of tranquillity would affect Hogshaw Farm and Wildlife Park.	The predicted specific noise levels during the operation (including maintenance) phase of the Proposed Development at Hogshaw Farm & Wildlife Park are very low at approximately 30 dB(A), which is lower than ambient sound levels measured by Sharps Acoustics in their targeted quiet monitoring locations **[REP1-129]**. The predicted noise levels would be expected to be significantly lower than other external areas of the park, based on the external amenities at the park (e.g. children's play areas, sand/water play, buggy tracks, seating areas, animal displays, car park movements). Furthermore, the noise prediction model assumes downwind propagation from each item of noise-emitting equipment towards the receptor, regardless of their respective positions within the Order Limits; this represents a precautionary approach in terms of noise predictions at receptors within the study area. As a result, it is not considered that the predicted operation (including maintenance) noise levels are sufficient to result in significant adverse effects at Hogshaw Farm & Wildlife Park. Temporary construction phase noise and vibration levels are not predicted to give rise to significant adverse effects at Hogshaw Farm & Wildlife Park based on the threshold criteria set out in BS 5228:2009+A1:2014. Please refer to response to **Ref. 8.2.8** below which provides further commentary regarding the tranquillity appraisal.
8.2.2	Hogshaw Farm & Wildlife Park LTD (Summary of the Applicant's Assessment, Page 4)	Comment noting that Hogshaw Farm & Wildlife Park is close to the proposed BESS site which is highlighted as the nosiest infrastructure component within the Proposed Development, yet the overall effect on tourism is not significant.	Please refer to response to **Ref. 8.2.1** above.
8.2.3	Hogshaw Farm & Wildlife Park LTD (Summary of the Applicant's Assessment, Page 4)	Comment noting the lack of site-specific analysis of how the significant noise impact will have a longer-term impact on the viability of the business.	Please refer to response to **Ref. 8.2.1** above.
8.2.4	Hogshaw Farm & Wildlife Park LTD (Battery Energy Storage Systems, Page 6)	Comment noting that the ES concludes operational noise impacts would be minor adverse, however there is no site specific analysis of current noise levels or evidence that the change would not affect visitor experience or general characteristics of Hogshaw Farm & Wildlife Park. Further comment noting that there may be perceptual implications of a large-scale BESS so close to a family attraction.	Please refer to responses **Ref. 8.2.1** and **Ref. 8.2.8**.
8.2.5	Hogshaw Farm & Wildlife Park LTD (Noise, Tranquility and Visitor Experience, Pages 6 and 7)	Comment noting the use of the Site as a quiet rural space by visitors including families and schools, which the report in the Annex of the response states does not include quieter parts of the Site in baseline conditions used by the Applicant. Further comment that the report states operational noise could become noticeable and intrusive	Please refer to response to **Ref. 8.2.8** below.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		which would alter the existing experience and reduce the sense of tranquillity.	
8.2.6	Hogshaw Farm & Wildlife Park LTD (Noise, Tranquillity and Visitor Experience, Page 7)	Comment on further development of the business including plans for onsite camping, which would not be viable if the rural setting were replaced with operational noise from industrial infrastructure. Further comment that the Applicant has not adequately assessed the effect of the Proposed Development on tranquillity and wider visitor experience.	Please refer to response to **Ref. 8.2.1** above.
8.2.7	Hogshaw Farm & Wildlife Park LTD (Page 18, Para. 3.8)	Comment noting that no attempt has been made to consider whether the Proposed Development might have an impact on the use and enjoyment of quiet places.	Please refer to response to **Ref. 8.2.1** above.
8.2.8	Hogshaw Farm & Wildlife Park LTD (Page 18, Paras. 3.9 – 3.12)	Comment noting that the assessment fails to account for the existing noise environment at Hogshaw Farm & Wildlife Park, given that the survey location (MP3) is closer to Claydon Road than the quieter areas of the site. Further comment that the baseline measurements and observations in the ES don't adequately characterise the true baseline therefore the quiet and tranquil areas have not been accounted for.	The Applicant considers that the initial approach taken by Sharps Acoustics **[REP1-129]** to establish tranquility at Hogshaw Farm & Wildlife Park is not considered to be representative or suitably robust. Sharps Acoustics adopted three monitoring locations at the extremities of Hogshaw Farm & Wildlife Park and note that they were specifically selected for their quietness, however, no further measurements were taken elsewhere to provide an appropriate understanding of the acoustic conditions across the Site as a whole. The lack of additional measurement positions in areas that would be expected to be dominated by man-made sounds is a clear omission, given the potential prominence of these external sources (e.g. children's play areas, sand/water play, buggy tracks, seating areas, animal displays, car park movements, corona discharge from overhead lines that bisect the site). Despite the 'quiet' locations selected for the tranquility appraisal, Sharps Acoustics note that the tranquility level may be affected to some degree if there were more visitors in the vicinity of the measurements, noting that with more people, the area may be reduced to a neutral or fair tranquility rating. If further measurements had been taken at other locations within the Hogshaw Farm & Wildlife Park to provide a better representation of spatial conditions, it would be expected that lower tranquility scores would be evident, given the quantity of annual visitors to the Site at over 70,000. It is noted within the Hogshaw Farm & Wildlife Park representation that the annual visitor numbers to Hogshaw Farm & Wildlife Park are anticipated to increase from over 70,000 to 150,000 over the next five years, which would be expected to have a detrimental effect on the tranquility of the site, for the reasons set out by the Natural Tranquillity Method. The predicted specific noise levels during the operation (including maintenance) phase of the Proposed Development at Hogshaw Farm & Wildlife Park are very low at approximately 30 dB(A) at the selected monitoring locations, which is lower than ambient sound levels measured by Sharps Acoustics in their targeted monitoring locations. Furthermore, the noise prediction model assumes downwind propagation from each item of noise-emitting equipment towards the receptor, regardless of their respective positions within the Order Limits; this represents a precautionary approach in terms of noise predictions at receptors within the study area. As a result, it is not considered that the predicted operation (including maintenance) noise levels are sufficient to result in significant adverse effects at Hogshaw Farm & Wildlife Park.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
8.2.9	Hogshaw Farm & Wildlife Park LTD (Page 20, Paras. 4.5 and 4.6)	Comment noting that the noise values adopted for the threshold of significance (65db for construction noise and construction vibration of 1mm/s) don't account for the impact on a quiet area.	The adopted threshold criterion of 65 dB $L_{Aeq,T}$ is considered to be appropriate in line with the recommendation of BS5228-1. In reality, the predicted construction induced noise levels at Hogshaw Farm & Wildlife Park would be significantly lower than this threshold value due to the considerable distances between the works and the receptor. The vibration criterion is not affected by the baseline noise levels at a site and therefore the adoption of a lower criterion accounting for tranquillity is not applicable. Notwithstanding this, it is anticipated that the construction-induced vibration would be imperceptible at the Hogshaw Farm & Wildlife Park due to the considerable distances between the works and the receptor.
8.2.10	Hogshaw Farm & Wildlife Park LTD (Page 20, Paras. 4.7 - 4.9)	Comment that guidance in NANR45 should be consulted for operational noise assessment as it is more suitable than just BS4142 for low frequency.	The use of NANR45 to inform the assessment of low-frequency noise from the Proposed Development is not appropriate, in line with the statement provided within introductory section of the NANR45 publication: *"The procedure is intended to assist in the evaluation of existing problems. It is not intended as a means of predicting when disturbance might occur, for example in a planning situation, and would not be reliable to use as such. This is because disturbance by LFN depends on a number of factors, such as the character of the sound, whose effects are neither well understood, nor readily predictable. Levels of sound above criteria based on the average threshold of hearing are frequently found to be acceptable and levels falling marginally below can occasionally cause disturbance, so no generic approach to prediction of disturbance appears to be possible."* Sound referred to as low frequency in NANR45 is energy within the 10 – 160 Hz frequency range. The Association of Noise Consultants Working Group considered that BS 4142 does not necessarily exclude such a wide range and note that it would be reasonable to use the BS 4142 methodology down to 50 Hz and possibly lower as part of a tonality assessment. With reference to the comments about low-frequency tones from inverters, previous measurements that have been taken by the Applicant within the 50-10kHz third-octave frequency range do not contain tonal components, and therefore low-frequency tones are not considered applicable when assessing the resultant emissions.
8.2.11	Hogshaw Farm & Wildlife Park LTD (Page 20, Paras. 4.10 and 4.11,)	Comment noting that given the low ambient noise levels, the value applied need to be checked for validity, as well a further justification to demonstrate that these penalties are reasonable.	Within the scope of BS 4142:2014+A1:2019, rating corrections to account for perceived tones within sources of noise can be applied on a variable scale. This ranges from just perceptible at the receptor, clearly perceptible and highly perceptible. In the case of Proposed Development, where installations are yet to be installed and measured, it is necessary to make a reasonable judgement based on professional experience as to the likelihood that tones will be audible at receptor locations. Based on the acoustic modelling and assessment undertaken, it is considered that should tones from specific items of plant be audible at receptors, these are unlikely to be more than "just perceptible". This is due to the low specific sound level predicted at receptors, which regularly falls below the level of residual sound experienced at receptors (that resulting from existing sources of noise) as presented in **ES Volume 4, Appendix 13.1: Baseline Noise Survey [EN010158/APP/6.4] [APP-127]**. It is acknowledged that the approach adopted introduces potential uncertainty to the assessment. This uncertainty is managed through the commitment within the **Draft DCO [EN010158/APP/3.1.4]** to achieve defined rating level limits at receptors. Rating levels account for

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			the predicted noise level from the Proposed Development, plus any relevant rating penalties for acoustic characteristics such as tonality. Compliance with the limits will be verified through post-completion monitoring, as secured in the **Outline OEMP [EN010158/APP/7.3.3].** Should it be identified during the detailed design or compliance stages that tonality (or other characteristics) would be more perceptible than expected, the resulting specific sound level from the Site would be reduced to account for the higher penalty, such that the total rating limit would be met. As a result, the impact of noise from the development would not be higher than that presented.
8.2.12	Hogshaw Farm & Wildlife Park LTD (Page 21, Para. 5.2)	Comment that given the location of where the measurements were taken, the assessment fails to identify the presence of quiet areas and doesn't evaluate the impact of noise from the Proposed Development on the enjoyment of visitors to Hogshaw Farm & Wildlife Park.	The Applicant considers that the initial approach taken by Sharps Acoustics **[REP1-129]** to establish tranquility at Hogshaw Farm & Wildlife Park is not considered to be representative or suitably robust. Sharps Acoustics adopted three monitoring locations at the extremities of Hogshaw Farm & Wildlife Park and note that they were specifically selected for their quietness, however, no further measurements were taken elsewhere to provide an appropriate understanding of the acoustic conditions across the Site as a whole. The lack of additional measurement positions in areas that would be expected to be dominated by man-made sounds is a clear omission, given the potential prominence of these external sources (e.g. children's play areas, sand/water play, buggy tracks, seating areas, animal displays, car park movements, corona discharge from overhead lines that bisect the site). Despite the 'quiet' locations selected for the tranquility appraisal, Sharps Acoustics note that the tranquility level may be affected to some degree if there were more visitors in the vicinity of the measurements, noting that with more people present, the area may be reduced to a neutral or fair tranquility rating. If further measurements had been taken at other locations within the Hogshaw Farm & Wildlife Park to provide a better representation of spatial conditions, it would be expected that lower tranquility scores would be evident, given the quantity of annual visitors to the Site at over 70,000. It is noted that the annual visitor numbers to Hogshaw Farm & Wildlife Park are anticipated to increase from over 70,000 to 150,000 over the next five years, which would be expected to have a detrimental effect on the tranquility of the site, for the reasons set out by the Natural Tranquillity Method. The predicted specific noise levels during the operation (including maintenance) phase of the Proposed Development at Hogshaw Farm & Wildlife Park are very low at approximately 30 dB(A) at the selected monitoring locations, which is lower than ambient sound levels measured by Sharps Acoustics in their targeted monitoring locations. Furthermore, the noise prediction model assumes downwind propagation from each item of noise-emitting equipment towards the receptor, regardless of their respective positions within the Order Limits; this represents a precautionary approach in terms of noise predictions at receptors within the study area. As a result, it is not considered that the predicted operation (including maintenance) noise levels are sufficient to result in significant adverse effects at Hogshaw Farm & Wildlife Park.
8.2.13	Hogshaw Farm & Wildlife Park LTD (Page 21, Para. 5.3)	Comment noting that due to the methodological shortcomings identified, a more robust assessment is needed which evaluates tranquillity, considers all relevant	Please refer to response to **Ref. 8.2.12** above.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		noise characteristics, and ensures that adverse and significant adverse effects are minimised or avoided.	
8.2.14	Preston Farms and TCS Biosciences Ltd (Page 7, Para. 47)	Comment noting a lack of consideration or assessment of impacts to livestock from noise in the Environmental Statement which inappropriately suggests that the sensitivity of a receptor such as Preston Farms is 'negligible'.	As acknowledged in the Sharps Acoustics document **[REP1-133]**, there are no reliable studies which enable an adverse effect to be linked to a measured level or metric. Given the uncertainty in terms of relevant criteria to be applied for horses in terms of threshold values, metrics and weighting corrections, communication with Preston Farms/TCS Biosciences throughout the works is considered to be the most appropriate solution to minimise potential impacts on their livestock (as recommended by Sharps Acoustics). The Applicant has carried out its own appraisal as set out in a Noise and Vibration Technical Study (**Annex A** to **Appendix 1** to this document)**,** which recognises the uncertainties to this receptor. The Noise and Vibration Technical Study (**Annex A** to **Appendix 1** to this document) sets out a summary of all relevant mitigation and design measures related to addressing the potential for effects on Preston Farms Ltd and TCS Biosciences Ltd. These measures note the importance of ongoing liaison with Preston Farms to agree steps to design, implement, monitor and manage measures that are bespoke to managing effects on Preston Farms Ltd and TCS Biosciences Ltd. This liaison is embedded within the assumptions made in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, where the following commitment was made within the Community Liaison section: *"Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. This typically serves to understand concerns from local residents and enable them to be addressed where feasible, thereby reducing the likelihood of complaints. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works."* As part of Deadline 1, the **Outline CEMP [EN010158/APP/7.2.3],** and **Outline DEMP [EN010158/APP/7.4.3]** were updated to include the following commitment in respect of this within Section 2.9 (Control of Noise): *"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 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."* In addition, the following statement is included with Section 2.10 of the **Outline CEMP [EN010158/APP/7.2.3]**: *"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."* The specific mitigation measures that are implemented will depend on the timing of the works and the location of the livestock at that time.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The **Outline OEMP [EN010158/APP/7.3.3]** as updated at Deadline 1, provides commitments to operational noise monitoring and communication and engagement with stakeholders. As part of Deadline 2, a Noise and Vibration Technical Study (**Annex A** to **Appendix 1** to this document) has been prepared to provide further information regarding the effects of noise and vibration on livestock (horses and sheep). The document presents a summary of available research and guidance on the impacts of noise and vibration on livestock, and sets out the mitigation measures proposed to avoid or reduce adverse effects.
8.2.15	Preston Farms and TCS Biosciences Ltd (Page 7, Para. 51)	Comment noting that insufficient detail is provided in the Environmental Statement as to how disturbance from construction and operation will be avoided including in terms of the visual and acoustic separation of livestock from infrastructure such as the substation, associated plant and the BESS.	Please refer to response to **Ref. 8.2.14** above.
8.2.16	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Paragraph 41)	Comment noting that an equine receptor assessment has not been undertaken. A behavioural assessment of livestock response has not been carried out, and a Preston Farms specific noise assessment has not been presented.	Please refer to response to **Ref. 8.2.14** above.
8.2.17	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Paragraph 57)	Comment noting that the Environmental Statement does not demonstrate that construction noise, vibration, lighting and activity levels in these areas as well as the ongoing operation of the infrastructure will remain compatible with the welfare and operational requirements of the animals.	Please refer to response to **Ref. 8.2.14** above.
8.2.18	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Paras. 3.11 and 3.12)	Comment noting that no non-residential receptors including equine receptors have been identified as needing to be included within the scope of the assessment.	Please refer to response to **Ref. 8.2.14** above.
8.2.19	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Paras. 4.1, 4.2 and 4.3)	Comment noting that the source levels for plant used in the Noise Assessment are lower than are typical for a development of this nature and size. No information has been provided in relation to tonal noise from plant, particularly from the proposed inverters. The assumptions underlying the assessment appear incomplete.	Within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, Section 13.7 sets out the measures that have been 'embedded' into the design of the Proposed Development to avoid or reduce potential significant effects as far as practicable. One of the measures is to utilise equipment with low noise emissions, where feasible. As a result, the Applicant has sought equipment which generates lower noise levels at source, utilising the latest information on equipment specifications from the supply chain. Within the scope of BS 4142:2014+A1:2019, rating corrections to account for perceived tones within sources of noise can be applied on a variable scale. This ranges from just perceptible , clearly perceptible and highly perceptible at the receptor. In the case of the Proposed Development, where installations are yet to be installed and measured, it is necessary to make a reasonable judgement based on professional experience as to the likelihood that tones will be audible at receptor locations. Based on the acoustic modelling and assessment undertaken, it is considered that should tones from specific items of plant be audible at receptors, these are unlikely to be more than "just perceptible". This is due to the low specific sound

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			level predicted at receptors, which regularly falls below the level of residual sound experienced at receptors (that resulting from existing sources of noise). It is acknowledged that the approach adopted introduces potential uncertainty to the assessment. This uncertainty is managed through the commitment within the **Draft DCO [EN010158/APP/3.1.4]** to achieve defined rating level limits at receptors. Rating levels account for the predicted noise level from the Proposed Development, plus any relevant rating penalties for acoustic characteristics such as tonality. Compliance with the limits will be verified through post-completion monitoring, as secured in the **Outline OEMP [EN010158/APP/7.3.3]**. Should it be identified during the detailed design or compliance stages that tonality (or other characteristics) would be more perceptible than expected, the resulting specific sound level from the Site would be reduced to account for the higher penalty, such that the total rating limit would be met. As a result, the impact of noise from the Proposed Development would not be higher than that presented.
8.2.20	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Para. 4.5)	Comment noting that the Noise and Vibration ES Chapter directs the reader to the Biodiversity Chapter for consideration of noise on ecological receptors, however, the chapter does not consider of the impact of noise on horses. The adopted thresholds do not enable an assessment of the impact of construction noise and vibration on equine receptors to be made.	Please refer to response to **Ref. 8.2.14** above.
8.2.21	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Para. 4.6)	Comment noting that considering sudden noises are most likely to have a significant impact on horses, a metric which considers short term 'spikes' of noise which can occur (such as the Lmax metric) to assess impacts is necessary alongside the $L_{eq,T}$, which averages noise over a particular time period, T. It is noted that no such metric is currently proposed by the Applicant.	Please refer to response to **Ref. 8.2.14** above.
8.2.22	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Para. 4.7)	Comment noting that the metrics referred to for human receptors are all "A weighted". This A weighting adjusts the sounds measured to allow for the way in which humans perceive sound at different frequencies. Horses (and other animals) do not respond in the same way, so an A weighted metric would provide an indication of the sound that they are hearing. When assessing noise impacts on different species, this must be accounted for.	Please refer to response to **Ref. 8.2.14** above.
8.2.23	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Para. 4.8)	Comment noting that the impact of vibration from piling has not been considered and no reason has been given for excluding it from the scope of assessment. This is a particular concern when considering the impact on horses, given that this has the potential to generate sudden, high levels of both noise and vibration.	Piling works for the PV frames will be a highly transient activity, with each pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s PPV criterion at the surrounding residential receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1200 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			the potential to be exceeded when works are taking place within approximately 50m of sensitive receptors. The proposed piling works are not intended within this distance. There are no provided vibration thresholds which indicate the onset of adverse effects in horses. Therefore, as part of the consultation with the landowner, if ground-borne vibration is shown to adversely affect livestock in adjacent fields, alternative rotary bored piling techniques could be adopted. 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 and vibration levels, where appropriate. This is captured within the **Outline CEMP [EN010158/APP/7.2.3]**: As part of Deadline 2, a Noise and Vibration Technical Study (**Annex A** to **Appendix 1** of this document) has been prepared to provide further information regarding the effects of noise and vibration on horses and sheep. The document presents a summary of available research and guidance on the impacts of noise and vibration on livestock, and sets out the mitigation measures proposed to avoid or minimise adverse effects.
8.2.24	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Paras. 4.9, 4.10 & 4.11)	Comment noting that the assessment of operational noise is proposed to be made using the approach suggested in BS4142. This is considered to be valid, except in relation to low frequency sound. The response continues that, given that some proposed plant (i.e. inverters) will produce low frequency tones, they consider that these should be considered separately, taking into account the potential for standing waves at the frequencies likely to be present.	The use of NANR45 to inform the assessment of low-frequency noise from the Proposed Development is not appropriate, in line with the statement provided within introductory section of the NANR45 publication: *"The procedure is intended to assist in the evaluation of existing problems. It is not intended as a means of predicting when disturbance might occur, for example in a planning situation, and would not be reliable to use as such. This is because disturbance by LFN depends on a number of factors, such as the character of the sound, whose effects are neither well understood, nor readily predictable. Levels of sound above criteria based on the average threshold of hearing are frequently found to be acceptable and levels falling marginally below can occasionally cause disturbance, so no generic approach to prediction of disturbance appears to be possible."* Sound referred to as low frequency in NANR45 is energy within the 10 – 160Hz frequency range. The Association of Noise Consultants Working Group considered that BS 4142 does not necessarily exclude such a wide range and note that it would be reasonable to use the BS 4142 methodology down to 50Hz and possibly lower as part of a tonality assessment. With reference to the comments about low-frequency tones from inverters, previous measurements that have been taken by the Applicant within the 50-10kHz third-octave frequency range do not contain tonal components, and therefore low-frequency tones are not considered applicable when assessing the resultant emissions.
8.2.25	Preston Farms and TCS Biosciences Ltd (Sharps Acoustics Review of Noise Assessment, Para. 4.12)	Comment noting that the submitted assessment of operational noise applies either a 2 or 3dB penalty to account for tones (or other intrusive sounds). Given the low ambient noise levels present, tonality is likely to be more than "just perceptible" in some locations. As a result, they consider the penalties applied likely to be too low. The impact of the noise may therefore be higher than that presented.	Please refer to response to **Ref. 8.2.19** above.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
8.2.26	Edgcott Parish Council (Page 2)	Concerns raised about noise pollution in relation to the large amount of plant and machinery present within the Proposed Development. Further comment raising concerns about the potential impact on wildlife resulting from noise pollution from the large amount of plan and machinery present within the Proposed Development.	Sources of noise and vibration associated with the Proposed Development have been assessed in accordance with the requirements of local and national planning policy, as presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. The assessment concludes that the effects from noise and vibration are not significant following adoption of appropriate mitigation measures. As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** impacts arising from noise and vibration have been fully considered on all applicable ecological receptors, and no significant adverse effects have been concluded. As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] **(RR-208 page 373)** which was submitted at Deadline 1, the Applicant submitted an assessment of the risk of disturbance to bats from construction noise generated by elements of the Proposed Development in a Technical Note (see **Bat Technical Study [EN010158/APP/8.5]** [REP1-105]). This also summarises a high-frequency unweighted noise study that had been carried out at an operational solar farm (using a template which has been accepted by Natural England in other licence applications). In summary, neither construction nor operation (including maintenance) phases are considered to represent a significant source of noise disturbance (however, some pre-construction assessments may be required depending on haul route layout and programme) of noise disturbance; however, some pre-construction assessments may be required depending on haul route layout and programme. Disturbance to ecological (wildlife) receptors may come about through noise, with respect to ecological receptors including birds, otter and badgers. A full assessment has been undertaken within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and **Outline DEMP [EN010158/APP/7.4.3]** details and secures the control measures to mitigate potential construction and decommissioning phase related effects to noise and vibration.
		The Adequacy of Assessment and Mitigation	
8.2.27	Preston Farms and TCS Biosciences Ltd (Page 7, Paras. 49 and 50)	Comment noting that the Applicant's assessment and proposed mitigation are deficient by reference to the requirements of the EIA Regulations, national policy and guidance.	This concluding comment has been addressed in the responses provided to other comments within the main body of the Applicant's responses to Preston Farms and TCS Biosciences Ltd (**Refs. 8.2.14 to 8.2.25** presented above).

Table 8-3: Noise and Vibration (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Effects on Receptors During Construction and Operation	
8.3.1	REP1-159, REP1-223	**Assessment** Request that the Applicant clarify the full range of receptors considered for noise impacts, including whether farm livestock, bats or other wildlife have been included and the extent of their susceptibility to noises of different types. Comment that this should also apply to children, adults, elderly populations.	Ecological (wildlife) receptors considered within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** include birds, otter and badgers**.** Human receptors (incorporating children, adults and elderly populations) have been accounted for within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** Consideration of noise and vibration impacts to livestock has been included within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, as part of the community liaison. As part of Deadline 1, the **Outline CEMP [EN010158/APP/7.2.3]** was updated to include further commitments for livestock. **Appendix 1** to this document has been prepared to provide further information regarding the effects of noise and vibration.
8.3.2	REP1-168	**Assessment** Comment that the likely operational noise impacts on residential properties have been significantly understated.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** The assessment methodology adopts a pessimistic approach to the prediction of noise levels from the Proposed Development. The prediction of noise is based on the assumption that all noise generating items of plant throughout the Site will operate at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, due to darkness and temperature fluctuations resulting in lower cooling demands. The assessment also assumes that all sources will propagate downwind to a given receptor, regardless of the relative location; this is likely to result in a further overestimation to the predicted noise level at receptors. Using this approach and appropriate mitigation measures, no noise effects of the Proposed Development are identified as being significant.
8.3.3	REP1-159, REP1-197, REP1-217, REP1-278, REP1-287	**BESS** Comment that there would be noise from the BESS which would be intrusive for nearby residential properties.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** No noise effects are identified as being significant following the adoption of appropriate mitigation measures.
8.3.4	REP1-159, REP1-246, REP1-250,	**Biodiversity** Comment that noise from the BESS and substation has the potential to be intrusive for farm livestock and other species such as bats and owls.	As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** impacts arising from noise and vibration have been fully considered on all applicable ecological receptors including owls, and no significant adverse effects have been concluded. The Applicant has undertaken an assessment of the potential for high frequency noise from electrical infrastructure and BESS to disturb commuting and roosting bats species with the conclusion that any disturbance effects are not likely to be significant. As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see RR-208 page 373)** which was submitted at Deadline 1, the Applicant submitted an assessment of the risk of disturbance to bats

Ref	WR	Summary Position	Applicant's Response
			from construction noise generated by elements of the Proposed Development in a Technical Note. This note also summarises a high-frequency unweighted noise study carried out at an operational solar farm (using a template which has been accepted by Natural England in other licence applications). In summary, neither construction nor operation (including maintenance) phases are considered to represent a significant source of noise disturbance (however, some pre-construction assessments may be required depending on haul route layout and programme) as detailed within **Bat Technical Study [EN010158/APP/8.5] [REP1-105]**. Disturbance to ecological (wildlife) receptors may come about through noise, with respect to ecological receptors including birds, otter and badgers. A full assessment has been undertaken within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. The **Outline CEMP [EN010158/APP/7.2.3]** and **Outline DEMP [EN010158/APP/7.4.3]** details and secures the control measures to mitigate potential construction and decommissioning phase related effects to noise and vibration.
8.3.5	REP1-177, REP1-246, REP1-250, REP1-282	**Biodiversity** Comment that noise during the construction period will impact wildlife.	Noise effects during the construction phase have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. No noise effects are identified as being significant following the adoption of appropriate mitigation measures. As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (RR-208 page 373)** which was submitted at Deadline 1, the Applicant submitted an assessment of the risk of disturbance to bats from construction noise generated by elements of the Proposed Development in a Technical Note (see **Bat Technical Study [EN010158/APP/8.5] [REP1-105]**). This note also summarises a high-frequency unweighted noise study carried out at an operational solar farm (using a template which has been accepted by Natural England in European protected species licence applications). In summary, neither construction nor operation (including maintenance) phases are considered to represent a significant source of noise disturbance (however, some pre-construction assessments may be required depending on haul route layout and programme). Disturbance to ecological (wildlife) receptors has been assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].** The **Outline CEMP [EN010158/APP/7.2.3]** and **Outline DEMP [EN010158/APP/7.4.3]** details and secures the control measures to mitigate potential construction and decommissioning phase related effects to noise and vibration.
8.3.6	REP1-137, REP1-150, REP1-151, REP1-152, REP1-162, REP1-168, REP1-177, REP1-178, REP1-181, REP1-183, REP1-187, REP1-189, REP1-197, REP1-199, REP1-201, REP1-202, REP1-204, REP1-209, REP1-212, REP1-217, REP1-218, REP1-221, REP1-226, REP1-228, REP1-230, REP1-240, REP1-244, REP1-	**Construction** Comment that noise of construction would cause disruption for local communities and affect residential amenity. Specific reference made to disruption to outside work, sleep quality (inc. for shift workers) and quality of life as well as noise from construction traffic.	Noise effects during the construction phase, including traffic flows have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044].** The assessment of construction noise has been undertaken in line with the Buckinghamshire Council guidelines for construction sites and British Standard 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites'. No noise effects are identified as being significant following the adoption of appropriate mitigation measures.

Ref	WR	Summary Position	Applicant's Response
	248, REP1-249, REP1-250, REP1-251, REP1-257, REP1-266, REP1-269, REP1-273, REP1-278, REP1-281, REP1-282, REP1-283, REP1-284, REP1-287, REP1-299, REP1-300		
8.3.7	REP1-159	**Construction** Comment that the Applicant has underestimated noise impacts during construction.	A construction phase noise assessment has been undertaken in accordance with BS 5228-1:2009+A1:2014 as presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. No noise effects are identified as being significant following the adoption of appropriate mitigation measures. The range of mitigation measures are set out in the **Outline CEMP [EN010158/APP/7.2.3].**
8.3.8	REP1-137, REP1-150, REP1-155, REP1-158, REP1-162, REP1-168, REP1-179, REP1-182, REP1-183, REP1-185, REP1-186, REP1-187, REP1-193, REP1-201, REP1-204, REP1-207, REP1-209, REP1-213, REP1-217, REP1-226, REP1-228, REP1-230, REP1-237, REP1-241, REP1-244, REP1-247, REP1-249, REP1-253, REP1-263, REP1-266, REP1-275, REP1-278, REP1-273, REP1-281, REP1-282, REP1-287, REP1-293, REP1-294, REP1-299	**Operation** Comment that there would be noise from the Proposed Development during operation which would disturb residents, especially at night. Specific reference to inverters, transformers and BESS cooling.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** An assessment of the inter-project cumulative effects with other existing and/or approved developments is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044].** The assessment methodology adopts a pessimistic approach to the prediction of noise levels from the Proposed Development. The prediction of noise is based on the assumption that all noise generating items of plant throughout the Site will operate at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, due to darkness and temperature fluctuations resulting in lower cooling demands. The assessment also assumes that all sources will propagate downwind to a given receptor, regardless of the relative location; this is likely to result in a further overestimation to the predicted noise level at receptors. Using this approach and appropriate mitigation measures, no noise effects of the Proposed Development are identified as being significant.
8.3.9	REP1-159, REP1-211, REP1-237, REP1-250, REP1-298	**PRoW** Comment that noise from the BESS and substation has the potential to be intrusive for users of PRoW and local footpaths.	Regarding PRoW, **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 the Proposed Development would be significantly lower than that generated during the construction phase and the proposed sources of noise would be heavily mitigated, including low-noise equipment and use of 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. PRoWs by their nature are 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.

Ref	WR	Summary Position	Applicant's Response
8.3.10	REP1-150, REP1-181, REP1-190, REP1-241, REP1-247, REP1-253, REP1-275, REP1-293, REP1-294	**Residential properties** Comment that there are concerns about operational noise in summer evenings when the windows are open and in gardens.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** This includes consideration of audible characteristics such as hums and takes into account the existing sound levels within the rural environment. The assessment has been undertaken in accordance with British Standard methods and in accordance with National Planning Policy, the Noise Policy Statement for England and Planning Practice Guidance for noise. The assessment considers the impact on external and internal locations when windows are open. No noise effects are identified as being significant following the adoption of appropriate mitigation measures.
8.3.11	REP1-263	**Residential properties** Comment that residents within 500–800 metres of the Proposed Development will experience unacceptable disturbance.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** This includes consideration of audible characteristics such as hums and takes into account the existing sound levels within the rural environment. No noise effects are identified as being significant following the adoption of appropriate mitigation measures. This includes residents within 500-800 metres of the Proposed Development.
8.3.12	REP1-142, REP1-148, REP1-190	**Vibration** Comment that properties in the local area do not have foundations and this makes any vibration impacts concerning.	An assessment of construction vibration is presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** Vibration from on-site construction activities would not exceed thresholds where complaints often occur. This is well below a magnitude where damage would occur to structures, regardless of the foundations. Construction traffic has been routed to avoid existing villages and towns as far as possible, with the intention of minimising potential disturbance experienced by occupants of sensitive roadside receptors. Significant levels of vibration from vehicle movements can occur when defects in the road surface are present. Prior to the works commencing, a condition survey of the proposed roads used for construction traffic will be undertaken. Where defects in the road surface in the vicinity of residential properties may give rise to excessive vibration from HGV movements, this would be identified to Buckinghamshire Council so that appropriate remedial works could be undertaken to minimise significant adverse effects. The road condition would subsequently be subject to interim reviews and maintenance in line with the Wear and Tear agreement secured by the **Outline CTMP [EN010158/APP/7.5.3]**.
The Adequacy of Mitigation			
8.3.13	REP1-197	**Topography** Comment that the topography of the Site means that sound carries clearly up hill.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** The assessment is informed by modelling and calculations which account for the topography of the area surrounding the Proposed Development.
Adequacy of assessments and surveys			

Ref	WR	Summary Position	Applicant's Response
8.3.14	REP1-159	**Assessment** Comment that the Applicant should consider the degree of disturbance from noise, light and dust even where it does not breach the threshold to be considered statutory nuisance.	Sources of noise associated with the Proposed Development have been considered and assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** No noise effects are identified as being significant following the adoption of appropriate mitigation measures.
8.3.15	REP1-217	**Assessment** Comment that the potential for 24-hour operational noise must be thoroughly assessed.	Sources of noise associated with the Proposed Development have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** This considers the potential for 24-hour operational (including maintenance) phase noise. The prediction of noise is based on the assumption that all noise generating items of plant throughout the Site will operate at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, due to darkness and temperature fluctuations resulting in lower cooling demands. The assessment also assumes that all sources will propagate downwind to a given receptor, regardless of the relative location; this is likely to result in a further overestimation to the predicted noise level at receptors. Using this approach and appropriate mitigation measures, no noise effects are identified as being significant.
8.3.16	REP1-150	**Assessment** Comment that there has been very little information provided about noise levels, both during construction and once the development is operational.	Sources of noise associated with the construction and operation of the Proposed Development have been detailed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** This document identifies the sources of noise and hours of operation, as well as other pertinent information such as the quantity of HGV movements. The level of noise which would not be exceeded at noise-sensitive receptors within the surrounding area is provided throughout the chapter and supporting appendices, in both tabulated and graphic format.
8.3.17	REP1-164, REP1-274	**Assessment** Comment that the Applicant has not adequately assessed potential impacts from noise. Specific comments raise that the local area is particularly quiet and tranquil, especially at night which means even "acceptable" levels of noise that will have a noticeable effect on local people's quality of life.	Sources of noise associated with the Proposed Development, including BESS, Collector Compounds and inverters have been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** This includes consideration of audible characteristics such as hums and takes into account the existing sound levels within the rural environment. The assessment has been undertaken in accordance with British Standard methods and in accordance with National Planning Policy, the Noise Policy Statement for England and Planning Practice Guidance for noise. No noise effects are identified as being significant following the adoption of appropriate mitigation measures.
		Other matters	
8.3.18	REP1-143	**Solar panels** Concern that the solar panels will emit noise.	Sources of noise associated with the Proposed Development have been considered and assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** No noise effects are identified as being significant following the adoption of appropriate mitigation measures.

Table 9-1: Population (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Businesses, Including Agricultural Businesses	
9.1.1	CSAG (Page 8, Para. 33 and Page 52, Para. 10 and Page 133, Paras. 7.3.22 and 7.3.23)	Comment noting that the fields occupied by Preston Farms in support of TCS Biosciences could have been excluded from the Order Limits with the BESS relocated to avoid noise and vibration and fire/smoke impacting the highly sensitive horses.	Fields occupied by Preston Farms in support of TCS Biosciences have not been excluded from the Order Limits as the Applicant considers that the forms of development proposed within these fields are appropriate following the assessment within the ES and following principles of good design as described in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**. Throughout the design process of the Proposed Development the Applicant has responded to feedback from concerned non-agricultural business, including TCS Biosciences, to help avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. As set out in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, some of the amendments to the design to reduce noise and other impacts, based on this feedback, include the removal of the Rosefield Substation from Field E23 (now only proposed for Solar PV development) to reduce noise, and incorporating suitable livestock movement corridors through the Solar PV development fields for TCS Biosciences livestock to access surrounding adjacent grazing fields. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at **Appendix 1** to this document 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 (**Annex A** - 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. Factors such as the proximity to Sion Hill Farm, offset requirements from overhead lines and pylons and presence of areas of higher flood risk led to the discounting of fields in Parcel 3 as being suitable for the BESS, combined with feedback from the Phase Two Consultation including in relation to views from Botolph Claydon and East Claydon and TCS Biosciences Ltd noting that BESS in Field E23 would cause disruption to the organisation, which resulted in the removal of the option for BESS in Field E23. The thorough design development process is detailed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** and **Design Approach Document [EN010158/APP/5.8.2] [REP1-018].** A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk people and animals remains very low. An air quality assessment, including atmospheric dispersion modelling, has been undertaken and was submitted at Deadline 1 as an addendum to the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius).

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			The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. Given a potential BESS fire would be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against Acute Exposure Guidance Levels (AEGLs), which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population could experience, including susceptible individuals and can also be assumed for horses or livestock: • Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure; • Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and • Level 3 - Life-threatening health effects or death. The closest receptor to the BESS (proposed to be located in Fields D8/D9) is Borshaw Farm 400m to the south (outside of the Order Limits), where the effects are judged to be very low within the Plume Assessment Summary. Borshaw Farm is closer to the BESS than the fields where horses from Preston Farms could be located. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Borshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. The Applicant has investigated emission levels in the field closest to the BESS where horses from Preston Farms could be located. HF emission levels within the fields are below the AEGL Level 1 threshold and are below the EAL threshold at 55m (173ug/m3 / 0.2 PPM) from the worst-case BESS fire position (approx. 35m from the field line boundary adjacent to the BESS). The levels reported within these fields are below the EAL and AEGL limits, which are set considering all human health receptors including people with severe respiratory issues or vulnerable babies. This is considered to pose no significant risk to human receptors and no evidence has been presented to suggest these levels would pose a significant risk to horses. The probability of fire emissions impacting the location is also very low because horses are not located downwind of the prevailing wind direction from the BESS site. It is also expected that should a BESS fire occur then horses would move away from the northern end of the field, away from the fire. Emission levels at the far sides of the field are lower, less than 0.1 PPM. The UKHSA is a Statutory Consultee for the Proposed Development and has declared in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** that the Applicant's BESS fire emission risk analysis and consequence modelling: "*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low".*

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9.1.2	CSAG (Page 14, Para. 60)	Comment that the majority of the land within the Order Limits is tenanted and that the Proposed Development will cause distress and disruption to tenants and will require them to relinquish multi-generational tenancies; including, in one case, a family home. Further comment noting that the Environmental Statement's Population Chapter does not regard this as a significant impact but that the CSAG does.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** sets out the existing freehold and leasehold/tenanted interests within the Order Limits, and identifies the specific changes in land access to be experienced in these cases. The Claydon Estate has negotiated with Tenant/Occupiers to provide Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to each Tenant/Occupier, such that the viability of those agricultural businesses would not be adversely affected. In one case, the Claydon Estate/Applicant has reached a voluntary agreement with the Tenant/Occupier to compensate for the use of the tenanted land instead of providing a land swap. The value (or sensitivity to change) of the agricultural land holdings as a receptor is considered by the assessment within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** to be 'very high', recognising the importance of the land, access and frequency of use is critical to the viability of the tenant businesses. The magnitude of change, due to the duration and compensation in-place referred to above, means that the change is considered to be 'minor' given replacement land is equally productive, of similar size and quality, and accessible. As such, the significance of the effect is considered to be slight adverse (not significant). There is no residential property within the Order Limits.
9.1.3	CSAG (Page 19, Para. 85)	Comment that the Proposed Development would give rise to significant disruption to the local community, biodiversity, tenant and business, adding to the existing disturbances from other projects in the area.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** sets out the approach to assessing impacts, in the context of mitigation, on the existing freehold and leasehold/tenanted interests within the Order Limits, and identifies the specific changes in land access to be experienced in these cases. Effects on agricultural businesses and landholdings within the Order Limits during the construction and operation (including maintenance) phases are reported to be temporary or permanent slight adverse so not significant in light of commercial agreements (including land swap and financial compensation) set to be in place and heads of terms which have been agreed with all relevant tenants and landowners. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** also considers the potential for environmental and access change to affect the viability and operation of other agricultural and non-agricultural businesses in proximity of the Site. Effects on non-agricultural businesses are reported to be temporary or permanent and at most slight adverse during construction and temporary but long-term and at most slight adverse during operation (for Prestons' Farm / TCS Biosciences Ltd, Claydon House and Hogshaw Farm and Wildlife Park), resulting in an overarching non-significant effect. This is also influenced by mitigation via commercial agreements (including land swap - with heads of terms with all relevant tenants and landowners having been agreed), in addition to the implementation of embedded and additional mitigation reported in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049], ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2], ES Volume 2, Chapter 10: Landscape and Visual [EN010158/6.2.2], ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Effects on community access/walkers, cyclists and horse riders are reported to be slight adverse and not significant during construction (taking account of measures outline within the **Outline CTMP [EN010158/APP/7.5.3]** to limit disruption to users of PRoW and permissive paths) and slight beneficial (not significant) during operation due to SCL/12/2 and SCL/13/2 combining to reduce journey length and increase community accessibility and connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west. The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in the **Outline CTMP [EN010158/APP/7.5.3].** The traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access. The full assessment on biodiversity is set out in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** with mitigation detailed and secured by the **Outline LEMP [EN010158/APP/7.6.3]**. Cumulative effects (inter-project effects) have been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044]**, which concludes that overall, cumulative effects relating to air quality, biodiversity, cultural heritage, land and groundwater, population, noise and vibration, and traffic and access and water would not be significant.
9.1.4	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Representation Summary)	Comment noting that the proximity of major infrastructure is a serious concern. The Rosefield Substation, Collector Compounds and BESS are close to sensitive parts of the farm, and the Environmental Statement does not demonstrate compatibility with the welfare and operational requirements of the animals.	The Applicant has taken advice from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. The Applicant's response to **Ref. 9.1.1** in this table sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. 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 also 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

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted at **Appendix 1** to this document 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 (**Annex A** - 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.
9.1.5	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Introduction, Para. 8)	Comment noting concerns regarding the impact the Proposed Development will have on the continued operation of the business, particularly given the compulsory acquisition powers and extensive land rights sought over land that is integral to the operation of Preston Farms and TCS Biosciences Ltd.	The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to 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. The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been provided by the Applicant at **Appendix 1** to this document 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. To address land use changes, Heads of Terms have been agreed for the replacement of land to be used for the Proposed Development, which is considered by the Claydon Estate to be of equal or better quality and offer no disadvantage to the operation of TCS Biosciences Ltd. 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 WRs submitted by Preston Farms. The Applicant agrees that it must comply with the statutory tests for compulsory acquisition, and considers it has satisfied these tests as set out in section 122 of the Planning Act 2008 (PA 2008). Thorough its **Land and Rights Negotiations Tracker [EN010158/APP/8.8.2]** and **Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.2]**, the Applicant has demonstrated that the land (including land within which Preston Farms and TCS Biosciences Ltd has an interest) is required for the Proposed Development, or is necessary to facilitate the development or is incidental to it.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Further, the Applicant has demonstrated that there is a compelling case in the public interest to satisfy the SoS that it can authorise the compulsory acquisition powers as set out in section 5 of the **Statement of Reasons [EN010158/APP/4.1.3] [REP1-010].** The Claydon Estate has negotiated with tenants to provide Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to each Tenant/Occupier, such that effects on viability of those agricultural businesses would not be adversely affected. These far exceed the provisions of compensation under the Agricultural Holdings Act 1986.
9.1.6	CSAG (Page 122, Para. 6.41)	Comment noting that several businesses and enterprises would suffer adverse economic effects from the physical and visual effects of construction and decommissioning phases. Further comment noting that the operation (including maintenance) phase's industrialisation of the countryside would affect resources and result in a loss of trade. Further comment that the in-combination effects with other projects on social and recreational amenity would be significant adverse.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** considers the potential for environmental and access change to affect the viability and operation of other agricultural and non-agricultural businesses in proximity of the Site. The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in response to **Ref. 9.1.3** in this table. The Applicant reiterates their position as set out on pages 50-51 of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** that the Proposed Development would not result in the creation of an industrialised landscape. Whilst it is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development, the Proposed Development would be underlain by a vegetative ground cover throughout the majority of the Site. Together with a substantial increase in hedgerow and tree planting, the Applicant does not consider that these changes would result in the industrialisation of the countryside. Cumulative effects on community access have been assessed within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044]**, which notes that residual inter-project cumulative effects are anticipated to be not significant. Landscape and visual effects on users of recreational routes have also been considered within this assessment: Users of the North Buckinghamshire Way/Midshires Way would experience increased significant cumulative effects over the lifetime of the Proposed Development; the PRoW network between Granborough and East Claydon would experience increased significant cumulative effects prior to mitigation planting reducing effects to not significant by year 10 of the Proposed Development.
9.1.7	CSAG (Page 220, Para. 4.8)	Comment noting that the application material does not address the loss to local farm holdings or an important group of farming operations with good productivity. The area of land taken for the Proposed Development is significant for the local farming community and will have a major impact on the tenants and farmers and their ability to continue in agricultural production due to the loss of flexibility and rotational cropping of certain crops.	The Applicant has undertaken an assessment of the effects on agricultural businesses within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** This sets out that: • The Applicant is in negotiations with Landowners and Tenant/Occupiers to arrange financial compensation for the use of land during construction (and operation) of the Proposed Development such that effects on viability of those agricultural businesses would not be adversely affected. • In some cases the Claydon Estate has negotiated with Tenant/Occupiers to provide Heads of Terms (which are agreed) for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			each Tenant/Occupier, such that effects on viability of those agricultural businesses would not be adversely affected. • In one case, the Claydon Estate/Applicant has reached an agreement with the Tenant/Occupier to compensate for the use of the tenanted land instead of providing a land swap. 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].**
		Effects on Tourism and the Visitor Economy	
9.1.8	CSAG (Page 38, Para. 170)	Comment that the Population Chapter notes that the Hogshaw Wildlife Park would only suffer visual effects and that, whilst these impacts would be significant, the Hogshaw Wildlife Park is grouped with the tourist sector as a whole meaning that a slight adverse residual impact on tourism is concluded.	Effects on the value and volume of the tourist economy and its components are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** in accordance with NPS EN-1. This includes an assessment of the potential for the change in the tourist/visitor economy at an economic scale, driven by changes to facilities and assets that contribute to the draw and experience of tourists in the local area, contributing to the value and volume of the wider tourist economy. This draws on effects reported across the ES, that may influence the tourist economy and its components including: • Visual effects, noise, vibration, air quality effects experienced by people; and • Where activities in the area could reduce accessibility or present physical obstructions to recreational and tourist facilities including accommodation, natural and cultural heritage, PRoW and tourist attractions. The assessment concludes that it is likely that some tourist sector receptors (e.g. local recreational attractions including Hogshaw Farm and Wildlife Park) would experience significant effects on visual amenity, but there would be no other significant environmental effects, and no change in land or access to land used by Hogshaw Farm and Wildlife Park. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited geographically (to six PRoW experiencing significant visual effects) and managed by embedded and additional mitigation as far as reasonably practicable. An assessment of the potential for change to business viability (including driven by access and environmental amenity) has also been undertaken where there may be the potential to affect the viability of businesses as a result of significant changes.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity at Hogshaw Farm and Wildlife Park. Mitigation has been applied to reduce the significance of these effects as far as reasonably practicable, and it is not considered that this would affect the viability of Hogshaw Farm and Wildlife Park given their diverse attraction and business model. During the pre-application period, consultation feedback has been considered, resulting in design changes and embedded mitigation being proposed to seek to limit adverse effects. In the case of Hogshaw Farm and Wildlife Park, a substantial woodland tree buffer is proposed to the eastern boundary of Fields D8, D9, D19 and D26.
9.1.9	CSAG (Page 39, Paras. 173 and 174)	Comment noting that there is no consideration for the risk of a BESS fire in the Population Chapter which could have a highly damaging long-term effect on TCS Biosciences and Hogshaw Wildlife Park. Further comment that the Proposed Development's disruption and/or closures of roads have not been considered.	The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and submitted at Deadline 1 as part of the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The assessment has been undertaken to be deliberately conservative to account for an extreme worst-case scenario. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. The closest receptor to the BESS is Borshaw Farm, where the effects are judged to be very low within the BESS Plume Assessment Summary, and which is closer than both TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Borshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. The Applicant has investigated emission levels in the field closest to the BESS where horses from Preston Farms could be located. HF emission levels within the fields are below the AEGL Level 1 threshold and are below the EAL threshold at 55m (173ug/m3 / 0.2 PPM) from the worst-case BESS fire position (approx. 35m from the field line boundary adjacent to the BESS). The levels reported within these fields are below the EAL and AEGL limits, which are set considering all

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			human health receptors including people with severe respiratory issues or vulnerable babies. This is considered to pose no significant risk to human receptors and no evidence has been presented to suggest these levels would pose a significant risk to horses. The probability of fire emissions impacting the location is also very low because horses are not located downwind of the prevailing wind direction from the BESS site. It is also expected that should a BESS fire occur then horses would move away from the northern end of the field, away from the fire. Emission levels at the far sides of the field are lower, less than 0.1 PPM. It can be concluded that the trace emission levels will be even lower at Hogshaw Wildlife Park and TCS Biosciences Ltd in the event of BESS fire incident meaning that the short term nature of a fire incident combined with trace levels toxic gas emissions would not pose a significant risk. In addition, Hogshaw Wildlife Park and TCS Biosciences Ltd are not downwind of the prevailing wind direction. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** provides an assessment of the potential for change to business viability (including consideration of traffic and access effects, recognising that this may cause changes to accessibility on the local highway network, and this has the potential to affect local businesses should it cause delays to visitor journey times, changes to access, or delivery delays, for example). This draws on **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** which reports that significant residual effects are not anticipated.
9.1.10	CSAG (Page 39, Paras. 175 and 177 and Page 57, Paras. 34 and 35)	Comment that loss or damage to the viability of TCS Biosciences or Hogshaw Wildlife Park could entail job losses, with both businesses employing around 100 people. Further comment that the Proposed Development FTE job creation during the operation (including maintenance) phase reflects a fifth of the employment these two businesses provide. Further comment that an assessment of these businesses should be subject to a separate assessment.	The Applicant recognises the importance and sensitivity of both TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park, but does not agree that as a result of the Proposed Development there would be job losses. The assessment of effects on businesses – including TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park – has been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** drawing on individual topic-specific assessment within the EIA. **TCS Biosciences Ltd:** The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to 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. The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) to provide a clear,

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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 (**Annex A** - 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 WRs submitted by Preston Farms. Based on the assessment and detailed mitigation measures identified, the Applicant does not agree that the Proposed Development would result in job losses at Prestons' Farms and TCS Biosciences Ltd. **Hogshaw Farm and Wildlife Park:** The Applicant's response to **Ref. 9.1.8** sets out the approach to consideration of effects on and mitigation for changes to environmental amenity and traffic / access (where relevant) for viability of Hogshaw Farm and Wildlife Park.
9.1.11	CSAG (Page 39, Para. 176 and Page 57, Paras. 36)	Comment that TCS Biosciences is an important business to the National Health Service as it offers medical testing and is an important exporter of medical technologies.	The Applicant recognises the importance of TCS Biosciences Ltd as a supplier to the NHS. The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to 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. The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex A** - 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.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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 WRs submitted by Preston Farms.
9.1.12	CSAG (page 320, Row 2)	Comment requesting assessment of potential risks of the development to TCS Biosciences, Hogshaw Wildlife Park, Claydon Park. This should include road closures/HGV traffic.	The assessment of effects on businesses – including TCS Biosciences Ltd, Hogshaw Farm and Wildlife Park and Claydon House/Park – has been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** drawing on individual topic-specific assessment within the EIA. **TCS Biosciences Ltd:** The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex 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. The **Outline CTMP [EN010158/APP/7.5.3]** provides specific provisions for Preston Farms and TCS Biosciences Ltd, as discussed with Buckinghamshire Council and includes measures to enable the safe movement of livestock over the pubic road, a feature not currently available. Measure to ensure the safe movement of livestock over internal access tracks are also provided. 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 WRs submitted by Preston Farms. **Hogshaw Farm and Wildlife Park and Claydon House/Park:** The Applicant recognises that there are residual significant adverse landscape and visual effects on Hogshaw Farm and Wildlife Park and Claydon House – however it is noted that mitigation is in place to address these effects and reduce the significance as far as reasonably practicable. The Applicant's response to **Ref. 9.1.8** sets out the approach to consideration of effects on and mitigation for changes to environmental amenity and traffic / access (where relevant) for viability of Hogshaw Farm and Wildlife Park. In terms of road closures and HGV traffic specifically, the Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15:**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Transport and Access [EN010158/APP/6.2] [APP-058] and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** The mitigation provided in **Outline CTMP [EN010158/APP/7.5.3],** including junction enhancements, addresses any significant effects predicted along the construction access route. Following the provision of mitigation, no significant effects are predicted. As such, the disruption to the road users is not significant, will not adversely impact tourist and visitor attractions. For example, no road closures or diversions such as those encountered with HS2 are proposed. Given that this business has continued through a far more intensive project that the Proposed Development, it is considered highly unlikely that the Proposed Development will have any measurable impact on business viability. The Proposed Development does not require road closures during the construction phase. As such, the commercial concerns noted would not result from the Proposed Development's traffic flows.
9.1.13	Hogshaw Farm & Wildlife Park LTD (Nature of the Business, Page 3)	Comment noting disagreement with the ES categorising tourism sensitivity as "medium" given the outdoor nature of Hogshaw Farm & Wildlife Park, making it more sensitive to changes to the landscape than other tourist sites. Further comment noting the planting of trees and work to create a biodiverse landscape around their site.	The sensitivity of the tourist economy is considered to be medium, in-line with the sensitivity criteria set out within Table 14.21 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2],** as it has some capacity to absorb or respond to change and may result in some perceptible socio-economic loss or gain. While there is no standard guidance for the sensitivity for the tourist economy, it has been informed by taking into account relevant legislation, statutory designations or classifications, policy and published data and research for the tourist economy, and informed by the detail of the value, volume, components and diversity of the tourist / visitor economy set out in Section 14.2 and 14.5 in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** The assessment draws on and is influenced by sensitivity criteria relating to individual components of the tourist economy likely to be affected, which may be more or less sensitive depending on the criteria applicable to each assessment, but considered in the context of effects on the tourist economy in-line with the policy requirements of NPS EN-1. It should be noted that the sensitivity of the tourist economy is presented as medium, not the sensitivity of Hogshaw Farm and Wildlife Park as an individual component of the tourist economy. As a non-agricultural business, paragraph 14.10.15 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** makes it clear that the receptor is of high sensitivity.
9.1.14	Hogshaw Farm & Wildlife Park LTD (Nature of the Business, Page 3)	Comment noting the role of Hogshaw Farm & Wildlife Park in education through their programmes and visits from local schools, which would be undermined by large-scale infrastructure.	There is no evidence to suggest that the presence of the Proposed Development would undermine the role of Hogshaw Farm & Wildlife Park in education through their programmes and visits from local schools.
9.1.15	Hogshaw Farm & Wildlife Park LTD (Summary of the Applicant's Assessment, Page 4)	Comment noting that Hogshaw Farm & Wildlife Park is the only identified tourism entity experiencing significant adverse visual effects, and that the conclusion that the overall effects on tourism are not significant is diluted	The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited in scale, with significant effects being limited to those on visual amenity, and would be managed by embedded and additional mitigation.

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		given the significant site-specific effect on Hogshaw Farm & Wildlife Park.	
Effects on Community Access for Recreation and Connectivity Walkers, Cyclists and Horse Riders, including Public Rights of Way and Permissive Paths			
9.1.16	CSAG (Page 3, Para. 9)	Comment noting that the Claydon villages, until recently, enjoyed a tranquil and rural landscape with access to valued PRoWs.	As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018],** the design of the Proposed Development has evolved to consider views from the Claydon villages and their settings. Four fields closest to the southern edge of Botolph Claydon were no longer considered for Solar PV development following Phase One Consultation, to reduce potential effects on residential properties and the setting of Botolph Claydon and the Botolph Claydon Conservation Area. Following Phase Two Consultation these fields were removed from the Order Limits altogether. Following Phase One Consultation Fields D8, D9, D18 and D19 were no longer proposed as an option for the Rosefield Substation, to reduce potential visual effects for residents of Botolph Claydon, and a potential location for the BESS in Parcel 3 was reduced in size from the potential BESS location indicated previously, to take account of landscape and visual assessments. In response to feedback received during Phase Two Consultation, the BESS and Rosefield Substation is no longer proposed in Field E23 of Parcel 3, in part to address feedback in relation to views from Botolph Claydon and East Claydon. The Applicant recognises that concerns remain regarding the impact on rural setting and has undertaken a detailed landscape and visual impact assessment presented in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. It is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development resulting in some significant adverse effects on landscape character and the visual amenity of PRoW. The Proposed Development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site together with a substantial increase in hedgerow and tree planting. Enhancements will be provided to the long-term accessibility of the area in order to promote and enhance access the natural environment in areas that are not currently accessible to the community: **ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]** provides a plan showing the existing PRoW network as well as the recreation and amenity improvements. In terms of new permissive paths, this includes: • A new public route across Parcel 1 by connecting the to-be-rationalised PRoW Footpath (reference 'SCL/13/2') before tracking east to the south of Shrubs Wood, east across Knowl Hill (Field B17) and then tracking north towards Three Points Lane (approximate length 1.9km); • A new public route across Parcel 1 connecting the above permissive path beginning from the intersection between Fields B17, B20 and B21 which then runs north to the west of B21 and B22 to Calvert Road and onwards to PRoW Footpath (reference 'MCL/13/1') (approximate length 0.7km); and

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			• A new public route across Parcel 2 which connects the existing PRoW Footpath (reference 'ECL/8/1') before tracking west along the north of D3 (South) to PRoW Footpath (reference 'ECL/9/2'') and PRoW Bridleway (reference 'ECL/10/2') (approximate length 0.5km).
9.1.17	CSAG (Page 24, Paras. 106 and 107)	Comment noting that the replacements for stopped up and/or diverted PRoWs do not compensate for the large-scale loss of amenity to PRoW users. Further comment that the Applicant has not provided evidence to suggest alternative sites with lesser impacts on PRoWs were available.	The Applicant disagrees. As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW as a result of the Proposed Development. Furthermore, the Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new permissive footpaths within the Site. With regard for the consideration of alternative sites and PRoWs, Paragraph 4.3.9 of NPS EN-1 (2023) 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.
9.1.18	CSAG (Page 99, paras. 4.2.14 and 4.2.15)	Comment noting that the Landscape and Visual Chapter does not factor the value of PRoWs to recreational visitors from outside the area. Further comment that it is not agreeable that LCA 5.7 is concluded as being of a low sensitivity.	Effects on the tourist economy and its components (including the role of PRoW to recreational visitors including those from outside the area) are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** in accordance with NPS EN-1. This includes an assessment of the potential for the change in the tourist / visitor economy at an economic scale, driven by changes to facilities and assets that contribute to the draw and experience of tourists in the local area, contributing to the value and volume of the wider tourist economy. This draws on effects reported across the ES, that may influence the tourist economy and its components including: • Visual effects, noise, vibration, air quality effects experienced by people; and • Where activities in the area could reduce accessibility or present physical obstructions to recreational and tourist facilities including accommodation, natural and cultural heritage, PRoW and tourist attractions. The assessment concludes that it is likely that some tourist sector receptors would experience significant effects on visual amenity, there would be no other significant environmental effects. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited geographically (to six PRoW experiencing significant visual effects) and managed by embedded and additional mitigation as far as reasonably practicable. Table 10.11 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** sets out the value of views dependent on their usage as part of the national, regional or more local PRoW network. As noted in Table 10.10 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** LCA 5.7 is judged to be of medium/low rather than low sensitivity. A detailed assessment regarding sensitivity is provided in **ES Volume 4, Appendix 10.3: Rosefield Landscape Sensitivity Appraisal [EN010158/APP/6.4] [APP-112].**

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9.1.19	CSAG (Page 273)	Comment noting that the Order Limits are covered by a well-connected network of footpaths and bridleways and many of these routes will be affected. The impacts of construction activities, the permanent loss of views and the negative experience for users of the PRoW network will be highly significant.	The Applicant has undertaken a detailed assessment of visual effects on recreational receptors within the study area as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The assessment concludes that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PRoWs between Botolph Claydon and Runts Wood (including Splash Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runts Wood); PRoW between East Claydon Road and Parcel 3; and Swan's Way/Outer Aylesbury Ring. Users of the North Buckinghamshire Way/Midshires Way would also experience significant effects during construction and at Year 1 of operation, but effects would reduce to not significant by Year 10. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** includes an assessment of effects of community access. Effects on community access/walkers, cyclists and horse riders are reported to be slight adverse and not significant during construction (taking account of measures outline within the **Outline CTMP [EN010158/APP/7.5.3]** to limit disruption to users of PRoW and permissive paths) and slight beneficial (not significant) during operation due to SCL/12/2 and SCL/13/2 combining to reduce journey length and increase community accessibility and connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west.
9.1.20	CSAG (Page 273)	Comment noting that in addition to footpaths and bridleways, the following long-distance recreational routes will be impacted by the Proposed Development: • A section of Bernwood Jubilee Way – The Claydons & Claydon Wood Walk - which passes through East and Botolph Claydon. • North Buckinghamshire Way/Midshires Way, and part of the Sustrans National Cycle Network across Fields E21, E22 and E23.	Effects for these long-distance recreational routes are noted in **Ref. 9.1.19** above.
9.1.21	CSAG (Page 278)	Comment noting that it is important not to underestimate the value of route ECL/10/1 & ECL/10/2 (Splash Lane) as it is the single most frequently used footpath/bridleway in the area.	As noted in Table 10.10 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** Splash Lane has been judged as a locally/regionally valued route where people would be highly susceptible to changes in visual amenity. The protection of PRoW are guaranteed in **Outline RoWAS [EN010158/APP/7.8.3].**
9.1.22	CSAG (Page 280)	Comment noting that route ECL/8/1, Botolph Claydon (Part of Bernwood Way) is a frequently used PRoW. The Proposed Development will fundamentally alter the nature of the walk in its entirety. CSAG questions the proposal to install solar panels on north-facing slopes in Fields D13 & D15. Orientation of the panels to face south in order to maximise irradiance means that users of this PRoW	The Applicant has undertaken a detailed assessment of visual effects on recreational receptors using this route as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and illustrated by the accurate visualisations for Viewpoints 9 and 11 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-117]**. Views of the Proposed Development would primarily be of the Solar PV modules set back 50m from the footpath to the east to retain longer distance views to the wider countryside, including Quainton Hill. The Solar PV modules would be enclosed by agricultural deer fencing. The assessment concludes that significant adverse visual effects are likely during construction and at

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		would be faced with walls of supporting structures bounded by security fences as they ascend the hill.	Year 1 of operation. Mitigation hedgerow planting would somewhat reduce effects by Year 10, however significant effects would remain for the duration of operation for users of PRoW ECL/8/1. In Solar PV developments, the orientation of the modules is designed to maximise energy output for a given installed capacity. A south-facing orientation provides the highest annual energy production, which would require a higher number of modules in case a different orientation was adopted.
9.1.23	CSAG (Page 280)	Comment noting that walkers using route EP-A1 to EP-A2 would be faced with a wall of the solar panel supporting structures behind security fencing. The suggestion of planting hedges to minimise the negative visual impact would create a tunnel effect and further destroy the openness of the landscape. CSAG do not agree with the Applicant's assessment that the scale of the change after 10 years would be 'Medium'.	The Applicant has undertaken a detailed assessment of visual effects on recreational receptors using this route, as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. As noted in Appendix 2C Landscape and Ecological Mitigation and Enhancements – Parcel 2 in the **Outline LEMP [EN010158/APP/7.6.3]**, the agricultural deer fencing and Solar PV modules would be set back 30m to the south of the route and a buffer of species rich grassland and scrub developed which would soften views by Year 10. Nevertheless, the assessment concludes that significant adverse visual effects are likely during construction and for the duration of operation for users of this permissive route.
9.1.24	CSAG (Page 280)	Comment noting that the 'industrial infrastructure' would have major adverse effects on the amenity value of Hogshaw Rare Breeds Farm, an important tourist attraction for the area.	The Applicant reiterates their position as set out on pages 50-51 of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** that the Proposed Development would not result in the creation of an industrialised landscape. Whilst it is acknowledged that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale Solar PV development the Proposed Development would be underlain by a vegetative ground cover throughout the majority of the Site. Together with a substantial increase in hedgerow and tree planting, the Applicant does not consider that these changes would result in the industrialisation of the countryside. The assessment set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** concludes that it is likely that some tourist sector receptors (e.g. local recreational attractions including Hogshaw Farm and Wildlife Park) would experience significant effects on visual amenity, but there would be no other significant environmental effects, and no change in land or access to land used by Hogshaw Farm and Wildlife Park**.**
9.1.25	CSAG (Page 281)	Comment noting that the proposed Buckinghamshire Greenway is part of the Council's vision for a continuous walking and cycling route. Request for the Applicant to provide details of proposed mitigation in relation to this initiative.	Discussions have been held between the Applicant and Buckinghamshire Council in relation to the Buckinghamshire Greenway. While the indicative route passes through the Order Limits, with the final route still to be determined, the land that the route 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 current use following construction of the Proposed Development. The provision of the Buckinghamshire Greenway by Buckinghamshire Council and/or the landowner through the Order Limits would therefore not be obstructed by the Proposed Development.
9.1.26	CSAG (Page 282)	Comment noting that CSAG disagree with the following statement at paragraph 14.8.81 in the Population ES Chapter: "It is noted that construction noise may change the experience of users of PRoW across and adjacent to	The construction induced noise levels experienced by users of a PRoW would vary depending upon the type of works being undertaken and the separation distances between the works and the PRoW. It could be expected that users of PRoW within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre-construction ambient noise levels, however, given the nature of the works, the construction activities affecting an individual

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		the construction works. ES Volume 2, Chapter 13: Noise and Vibration reports that: • It could be expected that users of PRoW within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre construction ambient noise levels. • However, the construction activities affecting an individual route would often be localised, and the transitory nature of PRoW users would mean that they are not exposed to construction noise for an extended period of time or length of wider walking route, albeit if users are regular users, then they would be affected more frequently."	route would often be localised. Construction noise which is perceptible may change the experience of users of PRoW, however, it would not give rise to significant adverse effects when considered in line with planning policy.
9.1.27	CSAG (Page 283)	Comment requesting that the Applicant provides clarity regarding exactly which parts of the PRoWs were included in the assessment of non-significant effects and significant effects and confirm what methodology was used to arrive at the impact assessments.	The approach to assessments of potential significant effects on PRoWs and access, and users of those routes/links considered relevant legislation, policy and guidance referred to in various chapters of the ES. In each case, each chapter of the ES sets out the specific approach taken, and regard to legislation, policy and guidance. The approach to the assessment of effects on the connectivity and community access for PRoW, including a detailed explanation of the methodology used, is set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. This includes a link-level assessment was undertaken to assess the changes to each individual link (as determined by the Buckinghamshire Definitive Map) where links interact with or are affected by the Proposed Development for any part of its length. This is considered in the context of embedded mitigation (via diversions, new or alternative links both permanent and temporary) that would be provided as part of the Proposed Development such as diverted/replacement PRoW, and which would be subject to the commitments in terms of delivery, design and maintenance set out in the **Outline RoWAS [EN010158/APP/7.8.3].** The assessment primarily considers where connectivity in terms of journey distance is changed as a result of the Proposed Development, in the context of replacement and alternative access during the construction/decommissioning and operation (including maintenance) phases. A further consideration was given where the Proposed Development affects existing (or provides new) strategically important links identified by policy, designation, stakeholder feedback or where there are substantively new routes that provide an improvement to the network in-line with wider plans and policies identified in that chapter. As set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2],** this draws on guidance including Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health'. It should be noted that the effects assessed by **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** are distinct from those assessed by **ES Volume 2, Chapter 15:**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Transport and Access [EN010158/APP/6.2] [APP-058], which assesses effects related to users of PRoW as follows: • Severance of communities (for example, as a result of changes in traffic flows on roads crossed by PRoW); • Pedestrian delay (for example, where this relates to changes in traffic flows interacting with paths used by walkers, cyclists and horse riders); • Non-motorised user amenity (for example, where users of the highway including walkers, cyclists and horse riders may experience change in journey time or amenity as a result of a change in traffic flows); and • Fear and intimidation (for example, where changes in traffic flow, heavy vehicle composition, the speed at which vehicles are passing and the proximity of traffic to people discourages walkers, cyclists and horse riders from using PRoW). The effects assessed by this chapter are distinct from those assessed by **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** which consider changes in environmental amenity experienced by users of PRoW.
9.1.28	CSAG (Page 283)	Comment requesting that the Applicant provides additional clarity regarding the assessments given to the following aspects for all PRoWs: • Landscape Value: National, Regional or Community • Landscape Susceptibility: High, Medium or Low • Magnitude of Landscape Change: Large, Medium, Small or Negligible • Geographic Extent: Wide, Intermediate, Localised or Limited • Duration and Reversibility: Short Term, Medium Term, Long Term or Permanent • Value of Views: National Regional or Community • Susceptibility of Visual Receptors: High, Medium or Low • Scale of Change: Large, Medium, Small or Negligible • Geographic Extent: Wide, Intermediate, Localised or Limited • Tranquillity, Noise & Vibration	The details requested can be found in Table 10.11 and Table 10.14 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** together with the detailed narrative description of effects in the same document.

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9.1.29	CSAG (Page 286)	Comment noting that the Proposed Development will impact the views and the experience from ECL/4/1, ECL/4/2, the North Buckinghamshire Way/Midshires Way (ECL/5/1) and gentle sloping walk down from East Claydon in the direction of Sion Farm.	The Applicant has undertaken a detailed assessment of visual effects on recreational receptors using these routes as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. It is proposed that PRoW ECL/4/2, be diverted northwards to the field boundary to enable a wildflower buffer between the PRoW and Rosefield Substation. Nevertheless, 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 PRoW ECL/4/1 and ECL/4/2. Users of the North Buckinghamshire Way/Midshires Way would also experience significant effects during construction and at Year 1 of operation, but effects would reduce to not significant by Year 10 as proposed hedgerow planting matures.
9.1.30	CSAG (Page 291)	Comment noting concern with respect to the proposed diversion of the existing PRoW footpath ECL/4/2 to the north of Parcel 3 to align the footpath with the field boundaries of Fields E10 and E11, rather than crossing Field E11. Once the impact of the Statera BESS development is factored in, then the entire experience along this route will be transformed from open countryside into an industrial site. CSAG's preferred solution in this location is to see a reduced amount of land take associated with solar panels in field E11, reshape the Collector Compound to maintain the required compound footprint and retain the existing footpath route. The land between the edge of the Collector Compound and the field boundary should be retained to create an area for BNG/natural habitat enhancement.	As shown on **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3] [APP-063]** and the **Works Plans [EN010158/APP/2.3.3] [REP1-005]**, Fields E10 and E11 are the proposed location of the Rosefield Substation, with the parameters allowing part of the Main Collector Compound to be located within these fields, if space allows around Rosefield Substation in the detailed design. The **Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]** demonstrate one way in which the Proposed Development could be arranged, subject to the final detailed design. This demonstrates that it is unlikely that Rosefield Substation would be able to be designed to allow PRoW footpath ECL/4/2 to be retained on its current alignment. Consequently, the proposed diversion of the PRoW is likely to be required and it will not be possible to reshape the Proposed Development to avoid this. Buckinghamshire Council at paragraph 4.7.52 of the Local Impact Report **[REP1-112]** confirm in relation to this proposed diversion *"the Council's view is the alternative routes are acceptable, and both are required for the development to take place"*. As noted in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** significant inter-project cumulative effects have been assessed at Year 1 and Year 10 in combination with the East Claydon BESS. However, the Applicant does not agree that the whole route would be transformed into an industrial site. From the eastern edge of Parcel 3, the PRoW lies to the northern edge of the proposed East Claydon BESS beyond a mature existing hedgerow. Although the East Claydon BESS LVIA notes temporary significant effects at Year 1, the effects are judged to be reduced to Negligible adverse at Year 10, as mitigation planting creates an effective screen. Any significant (moderate adverse) effects at Year 10 would be as a result of views of the Rosefield Substation in Parcel 3, rather than a continuous experience of renewable energy infrastructure.
9.1.31	CSAG (Page 297)	Comment noting concern with respect to the proposed diversion of footpath ECL/7/2 to the east of Parcel 2 to align the footpath with the field boundary of Field D19. Walking through the middle of a field can feel more scenic with a greater sense of connection with the countryside. Footpaths at the edges of fields may run closer to roads, traffic, fences, hedges and this can create a sense of risk and dilute the enjoyment of the route. CSAG's preference	The diversion of PRoW footpath ECL/7/2 to the eastern edge of Field D19 would not result in users of the route being close to roads or traffic; there would remain a separation of two fields from Claydon Road to the east. Buckinghamshire Council at paragraph 4.7.52 of the Local Impact Report **[REP1-112]** confirm in relation to this proposed diversion, although referencing MCL/17/2 in error, *"the Council's view is the alternative routes are acceptable, and both are required for the development to take place"*. As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the Applicant has developed the design of the Proposed Development to consider views and the experience of people using the local PRoW. This has formed part of the iterative design and EIA process and is

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		would be to retain the route of the existing footpath by reducing the number of solar panels in this location.	assessed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].** The proposed design response includes the diversion of PRoW ECL/7/2 to align the PRoW with the field boundary of Field D19, which would ensure that parts of the route do not have Solar PV development immediately adjacent to both sides of the footpath.
9.1.32	CSAG (Page 298)	Comment noting that the experience and enjoyment of walking the entire route of ECL/7/2 will be significantly negatively impacted by virtue of having to pass in very close proximity to the proposed location of the BESS facility in Field D9. This will be experienced by all walkers that use this route from Botolph Claydon to Hogshaw Rare Breeds Farm as they pass across Fields D10 and D19. CSAG's preferred solution is to relocate the BESS facility to a more suitable location within the Site.	A description of the user experience of footpath ECL/7/2 is provided in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. It is acknowledged that users of the PRoW would experience significant adverse effects as a result of some open views of the Solar PV modules along the route and views of the BESS and acoustic screen walls in Fields D8 and D9. However, the BESS would be located at a distance of some 50m from walkers on land within lower lying fields of Parcel 2 which would help to reduce its prominence. As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the Applicant undertook a thorough assessment of the Site to identify potential locations for all of the elements of the Proposed Development. There are a number of reasons why the proposed BESS has been located in Fields D8 and D9 rather than elsewhere within the Order Limits. These include: • Environmental constraints identified within other areas of the Site for larger elements of the Proposed Development, particularly in Parcel 1 and the southern part of Parcel 2. • Proximity to the road network for ease of access without needing to travel through the surrounding villages. • 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. • 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). • 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.
9.1.33	CSAG (Page 298)	Comment noting that the creation of the new permissive path (PP-A1 to PP-A2) that is to be located along the boundary of field D3 (North) & D3 (South) will enhance the existing connectivity across the PRoW network in this location.	The Applicant welcomes the acknowledgement from CSAG that the proposed permissive footpath will enhance the PRoW network.

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9.1.34	CSAG (Page 309)	Comment noting concern with the Proposed Development of solar panels in Fields D28 and D29. QUA/41/1 is currently a footpath that cuts across open farmland, across Field D28 from Runts Wood and connects to QUA/40/2, connecting Fields D27 and D37. CSAG's preferred solution would be to remove solar panels from Fields D28 and D29 to retain the enjoyment that is currently provided by the numerous PRoW routes that exist in this location. CSAG see no benefit to removing the dead-end bridleway to Coppice Lowhill Farm.	The Applicant is not intending to remove Solar PV development from these fields. 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 from the wider and more visually open parts of the Area of Attractive Landscape within the Order Limits where Solar PV development is not proposed. Whilst the proposed Solar PV development would be visible from PRoW in the vicinity of the fields, several of the routes would be separated from the proposed Solar PV development by existing retained vegetation, including large stretches of QUA/40/2 and QUA/40/3 to the south and QUA/42/2 to the west. The Applicant does not intend to remove bridleway ECL/10/5 to Coppice Lowhill Farm and this is not shown in any of the application documents.
9.1.35	CSAG (Page 311)	Comment noting concern with respect to the proposed diversion of the existing PRoW footpath SCL/13/2 and SCL/13/1 to the south of Parcel 1 (between Shrubs Wood and Decoypond Wood) to align the PRoW footpath with the field boundary of Field B7. CSAG's preferred solution would be to remove the solar panels from Fields B3, B6, B7, B8 & B10 and to retain the existing route of SCL/13/2 across Field B7, connecting to the proposed diverted route for SCL/13/2 in Field B6 at the western end of PP-A4.	The Applicant is not intending to remove Solar PV development from these fields. The proposed design response includes the diversion of PRoW SCL/13/2 to align the PRoW with the field boundary of Field B7, which would ensure that parts of the route do not have Solar PV development immediately adjacent to both sides of the footpath.
9.1.36	CSAG (Page 311)	Comment noting that the creation of the new permissive path (PP-A4, PP-A5, PP-A6 & PP-A7) that is to be located along the southern end of Shrubs Wood and along the boundaries of fields B10, B11, B17, B16 and B20 will enhance the existing connectivity across the PRoW network in this location.	The Applicant welcomes the acknowledgement from CSAG that the proposed permissive footpaths will enhance the PRoW network.
9.1.37	CSAG (page 323, row 32)	Comment requesting clarity on the assessments of impacts on PRoW in relation to the matters listed on Page 11 of CSAG-09. • Landscape Value: National, Regional or Community • Landscape Susceptibility: High, Medium or Low • Magnitude of Landscape Change: Large, Medium, Small or Negligible • Geographic Extent: Wide, Intermediate, Localised or Limited • Duration and Reversibility: Short Term, Medium Term, Long Term or Permanent	This point has been addressed at **Ref. 9.1.28** above.

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		• Value of Views: National Regional or Community • Susceptibility of Visual Receptors: High, Medium or Low • Scale of Change: Large, Medium, Small or Negligible • Geographic Extent: Wide, Intermediate, Localised or Limited • Tranquillity, Noise & Vibration	
9.1.38	CSAG (Page 119, Para. 6.13)	Comment noting that residents have provided comments noting great concern with the Proposed Development's adverse effects on their social and recreational amenity and health and wellbeing.	In terms of health and wellbeing pathways (including access to the natural environment for active recreation), it is noted that users of PRoW are likely to experience in-combination effects as a result of the experience of multiple types of environmental change. It is recognised that experience of the natural environment through recreational and other use of PRoW is an important aspect contributing to mental and physical health and wellbeing. Engagement and consultation has confirmed the understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operational (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing. Access to the natural environment, social mobility and sense of place are important to the consideration of mental health and wellbeing effects. These are considered within the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3])** at Section 5, but are also set out in the context of changes to the landscape and visual environment (Section 7.3) and changes to traffic, transport and access (including access to the natural environment for active recreation (Section 7.4). Enhancements have been provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing. **ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]** provides a plan showing the existing PRoW network as well as the recreation and amenity improvements. In terms of new permissive paths, this includes: • A new public route across Parcel 1 by connecting the to-be-rationalised PRoW Footpath (reference 'SCL/13/2') before tracking east to the south of Shrubs Wood, east across Knowl Hill (Field B17) and then tracking north towards Three Points Lane (approximate length 1.9km); • A new public route across Parcel 1 connecting the above permissive path beginning from the intersection between Fields B17, B20 and B21 which then runs north to the west of B21 and B22 to Calvert Road and onwards to PRoW Footpath (reference 'MCL/13/1') (approximate length 0.7km); and

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			• A new public route across Parcel 2 which connects the existing PRoW Footpath (reference 'ECL/8/1') before tracking west along the north of D3 (South) to PRoW Footpath (reference 'ECL/9/2'') and PRoW Bridleway (reference 'ECL/10/2') (approximate length 0.5km).
9.1.39	CSAG (Page 119, Para. 6.16)	Comment noting that even landscapes with 'low value' because they are despoiled may be of high value to whom it is all they have as a recreational resource.	The Applicant does not refer to any landscapes as 'low value' but makes a clear distinction between what could be considered as regionally and nationally valued landscapes in terms of the NPPF, paragraph 187a, and other landscapes not identified as having sufficient landscape qualities to elevate them above undesignated, everyday landscapes. The value of landscapes as noted in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** therefore identifies the locally designated landscapes of the Area of Attractive Landscape as being of regional value and other undesignated landscapes as being of community value.
9.1.40	CSAG (Page 119, Para. 6.19 and Page 154, Para. S1.34)	Comment noting that the construction of large projects, such as HS2, has increased construction traffic which has had a detrimental effect on people's amenity, health and wellbeing and quality of life. Further comment that many people do not use PRoWs that have become unsafe and that this means those unaffected PRoWs are now more valuable.	The Applicant recognises the importance of maintaining the connectivity and quality of PRoW that may be affected by the Proposed Development. Engagement and consultation has confirmed the understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operational (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing. Access to the natural environment, social mobility and sense of place are important to the consideration of mental health and wellbeing effects. These are considered within the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3])** at Section 5, but are also set out in the context of changes to the landscape and visual environment (Section 7.3) and changes to traffic, transport and access (including access to the natural environment for active recreation (Section 7.4)**.** The protection of PRoW is guaranteed in the **Outline RoWAS [EN010158/APP/7.8.3]**, which also confirms that enhancements will be provided to the long-term accessibility of the area in order to promote and enhance physical and mental wellbeing.
9.1.41	CSAG (Page 120, Para. 6.24)	Comment noting that the Proposed Development would not conserve or enhance Bernwood's environment (or widen public access etc.) and that the Proposed Development would fail to meet the objectives of the Bernwood Ancient Hunting Forest Project. Further comment that the Landscape and Visual Chapter concludes a major/moderate adverse effect on views from Bernwood Jubilee Way and that the non-visual/perceptual effects would be very high too.	Habitats in the post construction 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 The Applicant acknowledges the aims of the Bernwood Ancient Hunting Forest Project to conserve the Bernwood Forest. As stated within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see RR-026 page 38),** pursuant to 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]**, all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from Solar PV development to the security fence which exceeds Natural England

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			and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. The Proposed Development therefore does not impact on any ancient woodlands and therefore will have no impact on the aims of the Bernwood Ancient Hunting Forest Project. The Applicant has undertaken a detailed assessment of visual effects on recreational receptors using this route as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** and illustrated by the accurate visualisations for Viewpoints 9 and 11 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-117]**. Views of the Proposed Development would primarily be of the Solar PV modules set back 50m from the footpath to the east to retain longer distance views to the wider countryside, including Quainton Hill. The Solar PV modules would be enclosed by agricultural deer fencing. The assessment concludes that significant adverse visual effects are likely during construction and at Year 1 of operation. Mitigation hedgerow planting would somewhat reduce effects by Year 10, however significant effects would remain for the duration of operation for uses. As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, the Proposed Development would increase access within the Order Limits and enhance connectivity in the local area through the inclusion of three new permissive footpaths within the Order Limits. The new permissive footpaths would be as follows: • A new public route across Parcel 1 by connecting PRoW west of Pond Farm, via the south of Shrubs Wood and Knowl Hill, to Three Points Lane; • A new public route across Parcel 1 connecting the above permissive path to Calvert Road and onwards to PRoW south of Steeple Claydon; and • A new public route across Parcel 2 which connect Splash Lane/Three Points Lane to the Bernwood Jubilee Way. The proposed permissive footpaths would be implemented during the construction phase, remain open and accessible to the public during the operational (including maintenance) phase and would then be retained or removed at the discretion of the landowner post-decommissioning.
9.1.42	CSAG (Page 120, Para. 6.25)	Comment noting the proposal for the Buckinghamshire Greenway to cross the Order Limits and that, if implemented, users of this route would experience high levels of effects.	Discussions have been held between the Applicant and Buckinghamshire Council in relation to the Buckinghamshire Greenway. While the indicative route passes through the Order Limits, with the final route still to be determined, the land that the route 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 current use following construction. The provision of the Buckinghamshire Greenway by Buckinghamshire Council and/or the landowner through the Order Limits would not be obstructed by the Proposed Development.
9.1.43	CSAG (Page 120, Para. 6.27)	Comment noting that the Illustrative Layout Plans do not show PRoWs in the context of the Proposed Development's layout which makes it difficult to conceptualise the loss, diversion or surrounding of PRoWs by the Proposed Development. Comment noting that the Applicant provided a key plan showing PRoW	The **Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]** do show the existing retained PRoW and permissive routes, and the proposed diverted PRoW and permissive routes. They do not show the stretches of PRoW to be stopped up as those would no longer be present if the layout presented was implemented. The stopped up sections of PRoW are shown **ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]**.

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		amendments but that this has not been entered into the Examination.	
9.1.44	CSAG (Page 121, Paras. 6.34, 6.35, 6.38 and 6.39)	Comment noting that horses and riders using the PRoW network may be impacted by an enclosed nature of a managed PRoW, or be spooked by glint and/or glare. Further comment noting a spooked horse may bolt and this risks danger to personal safety and security. Further comment that it is not clear from the Proposed Development how users of PRoWs' safety and security has been designed in. Further comment that the Proposed Development would significantly adversely affect people's health and wellbeing, and the quality of their lives.	The PRoW corridors would be a minimum of 10m wide, with fence lines offset 10m either side of PRoW. Where the PRoW passes through the Solar PV development areas, the corridor would therefore be 20m wide. Along the Mid Shires Way/North Bucks Way, which is also a bridleway, a 30m offset would be applied. These corridors are therefore designed to be sufficiently wide to avoid being seen as enclosed. This is secured at design commitment F1 of the **Design Commitments [EN010158/APP/5.9.4].** The 'Advice on solar farms near routes used by equestrians' (The British Horse Society, 2025) states that "*any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a bright day.'* It also states that the BHS *'has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses*." The typical density of pedestrians and riders is low in a rural environment. There is little safety hazard associated with reflections towards an observer on a footpath or a bridleway, and any resultant effect is much less serious than, for example, on the road network. Furthermore, pedestrians or horses have more freedom to move beyond the solar reflection with little impact upon safety or amenity. The Applicant's position regarding the approach to assessment and mitigation related to the potential for effects on human health and wellbeing is set out in response to maters raised in **Table 5.2**.
9.1.45	CSAG (Page 133, Para. 7.3.21)	Comment noting that horses are highly sensitive receptors to disturbance and pollution and that they would be sensitive to the Proposed Development and the associated risks (e.g., BESS fire)	Potential disturbance to livestock and horses would be managed through the appropriate consultation with the relevant landowners and/or tenants so that they are aware of the construction works that would be taking place close to particular fields, and that the control measures with regards noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable. The Applicant is committed to ongoing consultation with relevant landowners and/or tenants with regards potential impacts from noise on livestock and horses during construction. These matters are secured through the **Outline CEMP [EN010158/APP/7.2.3].** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010158-000763-7.13.2 BESS Plume Assessment Summary (Clean).pdf A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk to people and animals remains very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and submitted at Deadline 1 as part of the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create

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			notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The assessment has been undertaken to be deliberately conservative to account for an extreme worst case scenario. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. The closest receptor to the BESS is Borshaw Farm, where the effects are judged to be very low within the Plume Assessment Summary, and which is closer than TCS Biosciences Ltd which is known to accommodate horses of high sensitivity. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Borshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. The Applicant has investigated emission levels in the field closest to the BESS where horses from Preston Farms could be located. HF emission levels within the fields are below the AEGL Level 1 threshold and are below the EAL threshold at 55m (173ug/m3 / 0.2 PPM) from the worst-case BESS fire position (approx. 35m from the field line boundary adjacent to the BESS). The levels reported within these fields are below the EAL and AEGL limits, which are set considering all human health receptors including people with severe respiratory issues or vulnerable babies. This is considered to pose no significant risk to human receptors and no evidence has been presented to suggest these levels would pose a significant risk to horses. The probability of fire emissions impacting the location is also very low because horses are not located downwind of the prevailing wind direction from the BESS site. It is also expected that should a BESS fire occur then horses would move away from the northern end of the field, away from the fire. Emission levels at the far sides of the field are lower, less than 0.1 PPM.It can be concluded that the trace emission levels will be even lower at TCS Biosciences Ltd in the event of BESS fire incident meaning that the short-term nature of a fire incident combined with trace levels toxic gas emissions would not pose a significant risk. In addition, TCS Biosciences Ltd is not downwind of the prevailing wind direction. Throughout the design process of the Proposed Development the Applicant has taken feedback from concerned non-agricultural business, including TCS Biosciences Ltd, to help avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. As set out in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, some of the amendments to the design to

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			reduce noise and other impacts, based on this feedback, include the removal of the option for the Rosefield Substation and BESS from Field E23 (now only proposed for Solar PV development). A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex A** - 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.
9.1.46	CSAG (Page 146, Paras. 8.15 and 8.16)	Comment noting that the Glint and Glare Assessment is unreasonable to conclude that the low numbers of people using minor roads and PRoWs warrant being classified as low sensitivity receptors.	The consideration of minor roads and PRoW as low sensitivity receptors in terms of glint and glare is related to the low density of people using them. The probability of a glint and glare episode is higher on motorways with dense traffic and lower on small residential roads, especially in a rural environment. However, probability is not the only parameter. There is little safety hazard associated with reflections towards an observer on a footpath or a bridleway, and any resultant effect is much less serious than on the road network. Glint and glare effects towards receptors on a PRoW are transient, and time and location sensitive, where a pedestrian could move beyond the solar reflection zone with ease and little impact upon safety or amenity. Most solar reflections are likely to be screened by existing and proposed vegetation, and the effectiveness will increase in time as vegetation grows. The effects would typically coincide with direct sunlight. The sun is a far more significant source of glare as it is more intense than reflected sunlight. Observers also have a higher tolerance to glare when their eyes are adapted to direct sunlight. The Solar PV modules would also have an anti-reflective coating to reduce glint and glare, as set out and secured in the **Design Commitments [EN010158/APP/5.9.4].**
9.1.47	CSAG (Page 146, Para. 8.19)	Comment requesting clarification as to whether the Glint and Glare assessment considered the higher eyeline of equestrians versus other receptor groups.	The eyeline of horse riders is higher than that of pedestrians or car drivers. However, the effects of glint and glare on bridleways have not been considered in the glint and glare assessment because no guidance currently exists to assess glint and glare effects on either horses or horse riders. The British Horse Society 'Advice on Solar Farms near routes used by equestrians' (2025) states that "*any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a bright day.' It also states that the British Horse Society 'has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses*."
9.1.48	CSAG (Page 146 and 147, Paras. 8.22 and 8.23)	Comment requesting clarification on the extent to which existing and proposed vegetation has been relied on to avoid and reduce glint and glare effects. Further comment requesting clarification as to whether vegetation screening has been assumed to screen glint and glare effects year round.	Existing large elements in the landscape can act as barriers and block solar reflections from view. In order to provide a reasonable worst-case assessment, only elements of significant size have been included in the detailed technical analyses within **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]**. These comprise woodland and structures (such as barns). The barriers identified are mostly LWS and SSSI, although some other smaller woods of significant mass and density have also been included. These obstructions are assumed

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			to effectively block sunlight all year round. Even in the winter months, when deciduous trees are bare, a dense accumulation of trunks and branches creates a complex physical grid that significantly interferes with light. Low winter Sun angles also mean that sunlight will encounter much more biomass than it would in summer, in spite of trees having no leaves. Existing small elements in the landscape (sheds, fences, lines of trees, isolated trees, hedges, etc.) have not been considered in the technical analyses. However, where the technical analysis has identified potential glint and glare impacts on a specific receptor, the potential of these small elements to block solar reflections has been considered in the overall impact.
		Approach to Assessment	
9.1.49	CSAG (Page 34 and 35, Paras. 150 and 151)	Comment noting that the Population Chapter of the Environmental Statement is not clear about how the categories of receptor were identified and the impacts selected for assessment are cherry-picked in a way that prevents meaningful assessment.	The Applicant does not agree that the categories of receptors or the impacts assessed have been "cherry picked" - the approach to identification of these effects and receptors has drawn on industry standard guidance (where available), and is in compliance with EIA Regulations and the policy framework identified by NPS EN-1 and NPS EN-3 as detailed in Section 14.2 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. For population and socio-economic impacts, the areas for assessment, and the sensitive receptors, were set out within **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]** and developed and agreed through consideration of the comments raised by the Planning Inspectorate and Statutory Consultees within **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]**.
9.1.50	CSAG (Page 35, Paras. 152 to 155)	Comment noting that the assessment of PRoWs is not undertaken in a holistic way and that the Population Chapter, Transport and Access Chapter, Landscape and Visual Chapter and Noise and Vibration Chapter all undertake isolated assessments for PRoWs. Further comment summarising that there is no holistic, in-combination assessment of PRoW-related impacts, inter or intra-project.	The transport impacts on PRoW users is detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]. ** No significant effects are predicted. Access and protection to PRoW routes are provided in **Outline RoWAS [EN010158/APP/7.8.3].** In-combination effects on users of PRoW have been summarised from individual ES assessments within Section 4 of the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3],** as engagement and consultation has resulted in the understanding that members of the community are concerned about the potential for general change in access and environmental amenity of public spaces (PRoW) during both the construction and operational (including maintenance) phases, which may have the potential to cause people to avoid using PRoW or reduce their enjoyment of those PRoW for recreation, leading to a detriment in terms of physical and mental wellbeing. In summary, the assessment sets out that following the consideration of embedded and additional mitigation, during the construction phase, users of PRoW will experience: • Negligible to minor adverse (not significant) effects relating to noise and air quality - changes in amenity of PRoW would be limited spatially, and transitory; • At most negligible adverse (not significant) effects in terms of severance, non-motorised user amenity and fear and intimidation; • Non-significant effects relating to visual amenity (negligible or minor/minor to moderate adverse) for seven PRoWs (including NCN Route No. 51, PRoW between Three Points Lane

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); • Significant effects relating to visual amenity (moderate or moderate/major adverse) for six PRoW (including North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3); and • Slight adverse residual effect on community access (PRoW and Permissive Paths) and their users (WCH), which is considered to be not significant.
9.1.51	CSAG (Page 35 and 36, Paras. 156 and 157)	Comment noting Paragraph 14.6.62 of the Population Chapter which sets out that professional judgment has been used to assess the impact of the Proposed Development on PRoW. CSAG consider such judgement no more than an opinion.	Professional judgement is one aspect of the impact assessment – noting that the context of this statement in full (paragraph 14.6.62 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2])** also sets out that "*effect is then quantified with regard to the nature of the impact, the probability of the impact and the duration, frequency and reversibility of the impact*" and that more detailed consideration of the impact/receptor-specific approach to sensitivity and magnitude informing significance is set out in Tables 14.21 and 14.22 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**, drawing (where available) on approaches set out in guidance listed under paragraph 14.2.35. For effects on PRoW, there is more defined guidance, policy and legislative context that has been applied to identify significant effects – for the approach to community connectivity / access via PRoW (one aspect of effects on PRoW and PRoW users considered across the ES), **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** applies guidance from the Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health' which, as set out in Table 14.22 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** (Magnitude of Change) sets quantitative thresholds applied to the assessment.
9.1.52	CSAG (Page 36, Paras. 158 and 159)	Comment that receptors have been discounted from assessment by placing impossibly high thresholds of significance in advance of scoping such matters out. An example is provided from the Population Chapter and regards the significance for effects on private property being the demolition of or loss of habitability of a property.	Effects on private property and housing have been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** in-line with the approach set out in response to the Scoping Opinion **(ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2])**. The determination of thresholds, sensitivity and magnitude are drawn from Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health' and were not determined by the Applicant.
9.1.53	CSAG (Page 36, Paras. 160)	Comment that the Environmental Statement does not consider the intra-project impacts of the Proposed Development on residents.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** within Section 17.5 includes a detailed assessment of intra-project effects on receptors, which includes residential receptors.
9.1.54	CSAG (Page 37, Paras. 165)	Comment that ES Appendix 5.5: Health and Wellbeing Summary Statement is inadequate. Further comment that there is no assessment of residential amenity, only an	Residential amenity is considered across all topics as residential property is a receptor for assessments relating to (for example) air quality, noise and vibration and landscape and visual amenity.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		assertion that the Proposed Development is designed to limit impacts on properties in accordance with Project Principles set out in the Design Approach Document.	The assessment does not rely solely on an assertion that the Proposed Development is designed to limit impacts on properties – in all cases, the embedded mitigation (in terms of design and location of the Proposed Development and its components) has been managed carefully and would be secured by the **Draft DCO [EN010158/APP/3.1.4]**. Where additional mitigation is set out to avoid, reduce or manage the potential for environmental or transport/access changes to residential amenity, this is secured by the Management Plans. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** draws together assessment on residential amenity where it is a determinant of health and wellbeing, identifying the significance of potential effects on people.

Table 9-2: Population (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Businesses, Including Agricultural Businesses	
9.2.1	Tenant Farmers Association (Paras. 2.1 and 2.2)	Comment noting that the Prime Minister, when leader of the opposition, noted that tenant farmers need a fair deal and that they need to know their futures are secure. Further comment noting that this statement needs to be reflected in decision making with regard for the impact of solar farm developments on tenant farmers.	ISEP Guidance published in December 2025 (*Solar PV on Agricultural Land: Essential Components of Environmental Assessments and Reports*) sets out that the EIA should consider the socio-economic impacts of displacement of tenant farmers, agricultural workers, and the impact on land-take on the continued viability of affected farms and wider local agricultural economy. While this guidance was published after the submission of the DCO Application for the Proposed Development, the Applicant is content that a compliant assessment has been undertaken within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in response to **Ref. 9.1.3** in this table. The Applicant's response to **Ref. 9.1.7** in this table sets out the position regarding the approach to mitigation and compensation for agricultural tenants and landholders including land-swaps, Heads of Terms and financial compensation. The Applicant has developed the Proposed Development iteratively to support the ongoing viability of existing businesses, and has committed to future detailed engagement on the implementation of mitigation measures secured within management plans to support the ongoing continuity of activities in tenanted areas in and around the Site that have the potential to be affected by construction and operational activity.
9.2.2	Tenant Farmers Association (Para. 3.4)	Comment noting that any decision should take account of the impact of the Proposed Development on the personal circumstances of those occupiers who are not party to the DCO Application and that they are properly considered such that, where those impacts are significantly negative, they would be sufficient to deny consent for change of use	The Applicant has worked to ensue that all interested parties have been engaged with and consulted as necessary to fulfil the consultation duty of the DCO application process and to identify occupiers who may be reasonably expected to be affected by the Proposed Development. In terms of transparent consultation, the consultation and Examination process for nationally significant infrastructure projects such as the Proposed Development is open to all. Correspondence and advertisement of both the consultations and the application is issued wider land interests than the Order Limits to ensure any nearby landowners of occupiers are aware of the proposals, and this was done in the case of the Proposed Development. An assessment of the potential for effects on tenant farmers who may be affected by changes to access or scale of land, or indirectly through severance or environmental change, has been considered within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** This draws on guidance for assessing the sensitivity and magnitude of change for both landowners and tenants for the purposes of EIA, and takes account of information available from known tenancy agreements between the affected landholder (the Claydon Estate) and tenants. In some cases, the Applicant has negotiated with landowners and tenants to negotiate financial compensation for the use of land during construction (and operation) of the Proposed

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Development such that effects on viability of those agricultural businesses would not be adversely affected. In other cases, the Claydon Estate has negotiated with tenants to provide Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to each Tenant/Occupier, such that effects on viability of those agricultural businesses would not be adversely affected. These far exceed the provisions of compensation under the Agricultural Holdings Act 1986. In some cases, where land is temporarily required on a short-term basis for construction activity but can then be returned to agricultural use, this land (except for access routes within it) would continue to be farmed after construction, with interim compensation arrangements agreed during the construction phase when that land is inaccessible. Should the voluntary agreements being negotiated with landowners not be entered into, the Applicant has sought powers of Compulsory Acquisition which it would seek to rely on. In this scenario the tenants would be entitled to compensation under the collection of legislation and case law commonly known as the Compensation Code which would consider the actual loss suffered. The Applicant is bringing forward the Proposed Development to support the government's aim to deliver a clean power system by 2030 and keep it clean beyond 2030 on the way to achieving its legally binding net zero target by 2050. The **Statement of Need [EN010158/APP/5.6]** [APP-036] provides further information on the urgent need for an unprecedented capacity of new solar schemes, including large-scale schemes for which there is a critical national priority (CNP) because of the decarbonisation, energy security, and affordability benefits that they deliver.
9.2.3	Tenant Farmers Association (Paras. 4.1 and 4.2)	Comment noting that the provisions for compensation under the Agricultural Holdings Act 1986 are inadequate and that landlords should provide levels of compensation which properly reflect a tenant's actual loss. Further comment noting the Act's provisions are regarded as setting the minimum levels of compensation and that it should be agreed to compensate to a tenant's actual loss.	Claydon Estate, as landowner, has negotiated and agreed HoT's that far exceed the provisions of compensation under the Agricultural Holdings Act 1986. Notwithstanding this, the Applicant's approach has been to proactively seek to minimise private loss (including through consultation and subsequent mitigation and design changes) to understand the impacts on tenants and seek to minimise them. This includes securing measures within the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Design Commitments [EN010158/APP/5.9.4].**
9.2.4	Tenant Farmers Association (Para. 4.4)	Comment noting that if compensation payable to displaced tenant farmers is not sufficient, the Examining Authority should refuse consent for the DCO Application.	Where powers of compulsory acquisition are exercised, owners of the relevant land or rights in land such as tenant farmers may be entitled to compensation under the Compensation Code, where a valid claim is made out. Any dispute in respect of the compensation payable would be referred to and determined by the Lands Chamber of the Upper Tribunal. The **Statement of Reasons [EN010158/APP/4.1.3]** [REP1-010] includes reference to helpful information which is available free of charge in respect of compulsory purchase and compensation, relevant in this instance 'Booklet No. 3 - Compensation to Agricultural Owners and Occupiers' (available here). The Applicant's **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7]** [REP1-107] includes a note at Appendix 1 on the Applicant's approach to minimising private loss, and sets out in detail how the Applicant

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			has sought to reduce impacts on key tenant interests (and their businesses, where relevant) in the Proposed Development's main development area. The Applicant's approach has been to proactively seek to minimise private loss (including through consultation and subsequent mitigation and design changes) to understand the impacts on tenants and seek to minimise them. This includes securing measures within the **Outline CEMP [EN010158/APP/7.2.3]**, **Outline OEMP [EN010158/APP/7.3.3]** and **Design Commitments [EN010158/APP/5.9.4]**. Both tenant farmers who will be 'displaced' have reached heads of terms agreements with the Claydon Estate which will provide them with replacement land of equal size to the land they are displaced from and contiguous to their existing holdings. Other terms of the agreements are confidential but seek to secure the future of both tenants in this location.
9.2.5	Preston Farms and TCS Biosciences Ltd (Page 7, Para. 46)	Comment noting that the Population Environmental Statement Chapter gives passing consideration to businesses, however, does not adequately assess the threat the Proposed Development presents to businesses and does not adequately consider alternatives and mitigation.	There is no single, standard guidance for undertaking population assessments (including assessments on business viability) within EIA. As such, the approach undertaken in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** reflects industry standards, best practice and information informing the approach to identifying effects, receptors, and their sensitivity in-line with the **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]**. For effects on businesses, this includes guidance from the Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health' – noting that following submission of the application new guidance has been produced by ISEP for the assessment of socio-economic effects relating to solar, but that this new guidance provides little additional information that would not materially change the assessment approach agreed through scoping. The circumstances of the individual businesses involved have been investigated via discussions with the landowners and tenants as appropriate up to finalisation of the application to inform the baseline position. Limited information has been published by the Applicant relating to TCS Biosciences Ltd to date due to a non-disclosure agreement, and concerns about the sensitivity of operations. Nonetheless, the Applicant has progressed negotiations directly with the landowners on the Site, and working with the Claydon Estate which is progressing negotiations with all its tenants in order to demonstrate to the SoS that although the agricultural (and non-agricultural) capacity of the Order Limits is reduced, that where appropriate, impacts on businesses as tenants are mitigated and/or compensated such that significant impacts on their operation are avoided. The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to 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. The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex 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. To address land use changes, Heads of Terms have been agreed for the replacement of land to be used for the Proposed Development, which is considered by the Claydon Estate to be of equal or better quality and offer no disadvantage to the operation of TCS Biosciences Ltd. 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 WRs submitted by Preston Farms.
9.2.6	Preston Farms and TCS Biosciences Ltd (Page 8, Paras. 56 and 57)	Comment noting that the impact on Preston Farms and TCS Biosciences Ltd falls within paragraph 4.2.15 of EN-1 as an 'unacceptable risk to, or unacceptable interference with, human health and public safety', given the critical nature of the product for the NHS and UK medical sector generally. View that the Proposed Development should not be permitted to threaten businesses' operation.	The Applicant notes that the policy text quoted by Preston Farms and TCS Biosciences Ltd corresponds to paragraph 4.2.28 of NPS EN-1 (2023) which discusses non-HRA and non-MCZ residual impacts of CNP infrastructure. The Applicant recognises the importance of the operation undertaken by TCS Biosciences, has taken advice from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses, which is reported in the ES. This has resulted in the assessments within the Environmental Statement not concluding a significant residual impact on Preston Farms Ltd and TCS Biosciences Ltd, or the National Health Service (by implication) – and therefore the Applicant does not consider that the Proposed Development represents (as determined by paragraph 4.2.15 of NPS EN-1) an 'unacceptable risk to, or unacceptable interference with, human health and public safety'. The Applicant has taken various actions taken to avoid, reduce and/or minimise potential effects on these businesses and does not consider that the Proposed Development's potential impact on these businesses would give rise to or pose unacceptable interference with human health and public safety, defence, irreplaceable habitats or poses an unacceptable risk to the achievement of net zero, as stated in the **Planning Statement [EN010158/APP/5.7.3] [REP1-016].** Accordingly, the Applicant considers that the CNP presumption applies to the Proposed Development.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in the Applicant's response to **Ref. 9.1.3** above.
9.2.7	East Claydon Parish Council (Page 1, Para. 3)	Comment stating that the Proposed Development would damage local businesses dependent on horses, sheep and wildlife (e.g. Preston Farm, TCS Biosciences and Hogshaw Farm and Wildlife Park)	The Applicant has taken advice from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. Engagement with Preston Farm and TCS Biosciences Ltd is ongoing in order to seek to review and amend the approach to managing the effects of the Proposed Development where practicable. 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 and TCS Biosciences Ltd, which includes reference to this point. Field margins will remain as open corridors for animals to disperse and mammal gates will be installed within fences to allow badgers access into fields for foraging, as secured in the **Design Commitments [EN010158/APP/5.9.4]**. As well as this, clearance gaps under fences to allow animals such as badgers and brown hare access to areas under Solar PV modules will allow for foraging and dispersal across the area. Paragraph 5.4.38 of the **Outline LEMP [EN010158/APP/7.6.3]** sets out that there will be a 10m wide buffer zone between fences and hedgerows/field margins, which will also allow animals to disperse along the buffer through the wider landscape. As indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, a number of the outline management plans were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on the Prestons' businesses. 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. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex A** - 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.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			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 WRs submitted by Preston Farms and TCS Biosciences Ltd.
9.2.8	East Claydon Parish Council (Page 1, Para. 3)	Comment listing local businesses as well as Claydon House and its associated business, and stating that they could all be adversely affected.	The Applicant has assessed effects on the local economy related to loss of land occupied by businesses, and changes in environment and access, within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. The assessment concludes that there are no likely significant residual effects on businesses referenced by this WR. Claydon House (an 18th Century country house) is a National Trust property and visitor attraction located north of the Order Limits. There are a number of supporting businesses adjacent to Claydon House, within the Claydon Estate, that offer refreshments and leisure opportunities to visitors. The venue is managed by the National Trust and open to the public to visit the house and gardens and is host to events such as the annual Towersey Festival. An assessment of the potential for change to access and environmental amenity has been undertaken where there may be the potential to affect the viability of businesses as a result of significant changes. These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity during the operational (including maintenance) phase. However, it is noted that for Claydon House, effects related to cultural heritage drawing on visual effects on setting and amenity are reported as slight adverse (not significant) in terms of operation (including maintenance) activity in the setting of Claydon House and Claydon Grade II Registered Park and Garden.
Effects on Community Access for Recreation and Connectivity Walkers, Cyclists and Horse Riders, including Public Rights of Way and Permissive Paths			
9.2.9	East Claydon Parish Council (Page 2, Para. 9)	Comment on walks and users' enjoyment of the rural setting being disrupted by construction and changed by the introduction of Solar PV modules.	The experience of users of PRoW on some routes within the wider area would be changed as a result of construction activity and the presence of the Proposed Development during the operation phase. However, the Environmental Statement confirms that this is limited to significant effects on visual amenity on a limited number of routes, with other environmental effects unlikely to be significant. Following the consideration of embedded and additional mitigation, during the construction phase, users of PRoW will experience: • Negligible to minor adverse (not significant) effects relating to noise and air quality - changes in amenity of PRoW would be limited spatially, and transitory; • At most negligible adverse (not significant) effects in terms of severance, non-motorised user amenity and fear and intimidation; • Non-significant effects relating to visual amenity (negligible or minor/minor to moderate adverse) for seven PRoWs (including NCN Route No. 51, PRoW between Three Points Lane and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Road/Parcel 3 and Granborough/ Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); • Significant effects relating to visual amenity (moderate or moderate/major adverse) for six PRoW (including North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3); and • Slight adverse residual effect on community access (PRoW and Permissive Paths) and their users (WCH), which is considered to be not significant. Several measures will be in place that would help to minimise disruption to community access across and within the Order Limits during construction, in addition to proposed temporary and permanent diversions. These include measures within Section 6 of the **Outline CTMP [EN010158/APP/7.5.3]** (On-Site Access Management Proposals) to limit disruption to users of PRoW and permissive paths, provide information and correct any damage caused by construction activity, and ensure safety of users. New signage and/or waymarking will be provided along diverted PRoW and permissive footpaths. Following the consideration of embedded and additional mitigation, during the operational (including maintenance) phase, users of PRoW will experience: • Negligible to minor adverse (not significant) effects relating to noise and air quality; • Negligible effects in terms of severance, non-motorised user amenity and fear and intimidation) (operational (including maintenance) phase were scoped out of the assessment as a result of being unlikely to give rise to greater than negligible effects); • Non-significant effects relating to visual amenity (negligible or minor/minor to moderate adverse) for eight PRoWs (including North Buckinghamshire Way/Midshires Way, NCN Route No. 51, PRoW between Three Points Lane and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon Road/Parcel 3 and Granborough/Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); • Significant effects relating to visual amenity (moderate or moderate/major adverse) for five PRoW (including Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3); and • Slight beneficial effects on community access (PRoW and Permissive Paths) and their users (WCH), which is considered to be not significant - the creation of new permissive paths would also increase community accessibility and recreational opportunities in an area that is currently inaccessible. The routes would improve community connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west.

Table 9-3: Population (Other Interested Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Businesses, Including Agricultural Businesses	
9.3.1	REP1-159	**Approach to assessment** Comment that the consequences for local agriculture, tenant farmers and businesses critically dependent on agriculture do not appear to have been considered in appropriate detail or with the seriousness they deserve.	The Applicant has undertaken an assessment on the scale of indicative land use and employment capacity change in the agricultural economy, and effects on agricultural and non-agricultural businesses, **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** The Applicant's response to **Ref. 9.1.7** in this table sets out the position regarding the approach to mitigation and compensation for agricultural tenants and landholders including land-swaps, Heads of Terms and financial compensation. 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].**
9.3.2	REP1-171	**Approach to assessment** Comment that long term effects on the community, countryside, business and rural economy with regards to young people and young adults have not been assessed.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** includes a detailed assessment of effects on both construction/decommissioning and operational employment, workforce spending and contribution to overall output (GVA), in addition to the effects on agricultural economy and landholdings, effects on agricultural and non-agricultural businesses, effects on tourism and the tourist economy and effects on community access. Relevant effects on young people and young adults are considered indirectly through the assessment of effects on the employment, the local labour market, community and recreational facilities and the wider socio-economic context, which inherently include young people and young adults as part of the population baseline. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** considers long-term effects on young people and young adults, drawing together relevant effects from across the Environmental Statement and adopting a health determinants and pathways approach.
9.3.3	REP1-159	**Agricultural businesses** Disagreement with the Applicant's assessment that the impact of the Proposed Development on the agricultural economy of Buckinghamshire would not be significant due to the magnitude of impacts on agricultural businesses within the Order Limits.	The Applicant has undertaken an assessment on the scale of indicative land use and employment capacity change in the agricultural economy, effects on agricultural and non-agricultural businesses within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** The Applicant's response to **Ref. 9.1.7** in this table sets out the position regarding the approach to mitigation and compensation for agricultural tenants and landholders including land-swaps, Heads of Terms and financial compensation. **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 *indicative capacity* for up to around 10 FTE jobs" (emphasis added).

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			It is further noted, to contextualise this, that (paragraph 14.8.20) "*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*". 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].**
9.3.4	REP1-214	**Agricultural businesses** Comment that there would be a probable collapse of local specialist Foundation herd of pedigree Red Devon cattle, based at Knowl Hill due to reduction in suitable grazing land available that is properly fenced and close to farmhouse and farm buildings.	Where the Order Limits overlap with grazing tenancies, Heads of Terms are in place for replacement land of similar size and quality, with no impact on the viability of agricultural businesses, as set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** As replacement land is available, the Applicant is confident that the Proposed Development should not result in the collapse of the cattle herd. The Applicant has consulted directly with affected businesses and will continue to engage with them to ensure that the Proposed Development does not result in the collapse of their herds. In addition, some cattle grazing is proposed in the areas set aside for landscape and ecological mitigations and enhancements as set out in the **Outline LEMP [EN010158/APP/7.6.3].** There will therefore be some grazing opportunities for local cattle and sheep herds within the Proposed Development once operational.
9.3.5	REP1-159	**Agricultural businesses** Comment that the Applicant has not appropriately considered the socio-economic importance of agriculture to the area local to the Proposed Development.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** includes a detailed assessment of effects on the agricultural economy and agricultural businesses during construction, operation and decommissioning phases. Effects on the agricultural economy are reported to be slight adverse and not significant in both the construction and operation (including maintenance) phases of the Proposed Development, due to the agricultural economy in Buckinghamshire being substantial and subject to annual/seasonal variations that are far greater than the indicative loss of employment capacity. Effects on agricultural businesses and landholdings during the construction and operation (including maintenance) phases are reported to be temporary or permanent slight adverse so not significant in light of commercial agreements (including land swap and financial compensation) set to be in place and heads of terms having been agreed with all relevant tenants and landowners.
9.3.6	REP1-159	**Agricultural businesses** Comment that during the construction phase management of livestock would be compromised due to noise, dust,	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

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		movement of heavy plant, workforce, displacement and biosecurity risks.	bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex A** - 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.
9.3.7	REP1-146	**Agricultural economy** Comment that the UK's wider agricultural economy would also be impacted by the Proposed Development, affecting producers of agricultural machinery, animal feed and other supplies.	Effects on the agricultural economy will be limited. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses. 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]**. **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 *indicative capacity* for up to around 10 FTE jobs" (emphasis added). It is further noted, to contextualise this, that (paragraph 14.8.20) "*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*". Overall, it is anticipated that agricultural tenants are unlikely to be significantly affected by the Proposed Development in terms of their ability to produce economic output. As such, there is likely to be limited change to the employment supported by and activity generated by the local or regional agricultural economy, or the national agricultural economy.
9.3.8	REP1-159	**Agricultural land holdings** Disagreement with the Applicant's assessment that the magnitude of impact to agricultural land holdings would be	The magnitude of change to agricultural landholdings and tenant operations is considered minor following the application of embedded and additional mitigation, including land-swaps, compensation and mitigation.

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		minor and therefore with the assessment that the overall impact would not be significant.	The Applicant's response to **Ref. 9.1.7** in this table sets out the position regarding the approach to mitigation and compensation for agricultural tenants and landholders including land-swaps, Heads of Terms and financial compensation. **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 *indicative capacity* for up to around 10 FTE jobs" (emphasis added). It is further noted, to contextualise this, that (paragraph 14.8.20) "*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*".
9.3.9	REP1-145, REP1-183, REP1-191, REP1-217, REP1-218, REP1-220, REP1-250, REP1-251, REP1-300	**Agricultural land** Comment that there would be a negative socioeconomic impact from the loss of agricultural land as it will affect the viability of farming businesses. Specific reference made to Preston Farms.	The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in response to **Ref. 9.1.3** in this table.
9.3.10	REP1-180, REP1-189, REP1-191, REP1-218, REP1-300	**General comment** Comment that farms and local businesses employ a lot of the local community and therefore any impacts to their viability will affect local residents. Specific reference made to Preston Farms, TCS Biosciences and Hogshaw Farm and Wildlife Park.	The Applicant acknowledges the importance of local businesses and has worked throughout the Application and Examination process to understand the sensitivities of the operations identified within these WRs. In bilateral discussion and consideration of feedback gained through consultation, the Applicant has iteratively designed the Proposed Development where practicable to avoid or reduce significant adverse effects, and to amend the scheme and create bespoke additional mitigation commitments within management plans that are specific to individual sensitive businesses where it has been raised that viability is perceived to be at risk. The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in response to **Ref. 9.1.3** in this table. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock and horses.
9.3.11	REP1-151, REP1-152, REP1-162, REP1-177, REP1-192, REP1-224, REP1-261, REP1-266, REP1-288	**General comment** Comment that there would be impacts on existing businesses.	The Applicant has assessed effects on the local economy related to loss of land occupied by businesses, and changes in environment and access, within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. The assessment concludes that there are no likely significant residual adverse effects on existing business.

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9.3.12	REP1-228	**General comment** Comment that adverse impact on residents of Botolph Claydon should be taken into account and given due weight when considering the proposal.	The impacts on residents of Botolph Claydon from a landscape perspective, considering Residential Visual Amenity and visual impact on PRoW, has been considered in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The impacts on residents from an air quality, noise and traffic and access perspective have also been considered and are detailed in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049], ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** An assessment on the interaction between residents (community), facilities, social infrastructure and commercial land and property has been undertaken and is detailed in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** which includes a Health Effects Report has been provided which considered the effects of the Proposed Development on human health and wellbeing. Measures to mitigate effects on receptors, including local residents, are detailed and secured in the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline DEMP [EN010158/APP/7.4.3]** and **Outline CTMP [EN010158/APP/7.5.3].**
9.3.13	REP1-170, REP1-178, REP1-189, REP1-191, REP1-220, REP1-250, REP1-251, REP1-257	**Jobs** Comment that a lot of local jobs will be lost due to reduced revenues and operational areas of farms.	Effects on the agricultural economy will be limited. **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 *indicative capacity* for up to around 10 FTE jobs" (emphasis added). It is further noted, to contextualise this (at paragraph 14.8.20) that "*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*". Overall, it is anticipated that agricultural tenants are unlikely to be significantly affected by the Proposed Development in terms of their ability to produce economic output. As such, there is likely to be limited change to the employment supported by and activity generated by the local or regional agricultural economy, or the national agricultural economy.
9.3.14	REP1-170	**Jobs** Comment that there will be fewer job opportunities for young people.	Young people will have access to a significant proportion of the 180 FTE jobs generated by the [construction phase of the] Proposed Development, which are likely to be drawn from within the Construction Labour Market Area Focus Area during construction (see **ES Volume 3, Figure 14.3: CLMA Focus Area [EN010158/APP/6.3] [APP-073]**). The aim to ensure that young people access opportunities to gain and sustain employment directly at the Site of the Proposed Development, through the supply chain or as a result of other activities to be delivered by the Applicant and/or its contractors, is one of the underpinning principles of the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3]**. Two of its five objectives, set out in the Section 2.4, directly address this. These are:

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- Promote opportunities for people who are unemployed or currently employed to access employment and skills development opportunities. This includes young people who are Not in Education, Employment or Training; and
- Harness the potential of the Proposed Development to motivate and encourage young people to stay in Buckinghamshire and pursue careers here, benefitting all employers.

Key elements of the Outline ESSCP, which would contribute to employment opportunities for young people are:

- Access to a suite of skills and work opportunities, which could include work experience placements, entry level jobs and joint Apprenticeships across industry partners. Training and upskilling opportunities would be provided and could extend to employability support like interview training and CV support for those wishing to access entry level jobs. Additionally, access to wider employment and skills opportunities within the Applicant organisations would be provided, including Apprenticeships and Graduate Entry;
- A communications campaign to raise awareness on jobs and skills opportunities, using appropriate local networks and communications media. Key local partners that the applicant would work with to connect with job seekers, including schools, Further and Higher Education Colleges, the Department for Work and Pensions and Bucks Business First, are set out in Section 2.5 of the Outline ESSCP. Job readiness support, including sector-focused initiatives like the Department for Work and Pensions Sector Based Work Academy Programme, would be available to job seekers. The Applicant has already sponsored Buckinghamshire Business First and the activities of the Bucks Skills Hub 2025/26 to begin to raise the profile of opportunities that will become available through the Proposed Development and develop links with stakeholders with good reach into job seeker communities, to translate these job opportunities into benefits for local people. The Applicant has already been contacted by schools and young people about upcoming opportunities as a result of participation in the Bucks Skills Show 2026;
- Attendance at job fairs, careers days in schools and colleges, and other jobs and careers awareness events, promoting the opportunities for jobs and careers in solar and other renewable energy;
- Provision of knowledge, experience and advice to test the feasibility, and enable the roll out, of Destination Renewables in Buckinghamshire. Destination Renewables was developed through a collaboration between DP Energy, Pembrokeshire College and EDF Renewables, supported and welcomed by the Welsh Government. It provides a comprehensive introduction for young people, aged 16 - 18, to the opportunities that a career in renewable energy can open up for them. This has potential not only to influence decisions on future careers, but also to provide a practical mechanism to make direct connections between young people and potential future employers; and
- Provision of an Education and Skills Fund to increase opportunities in the renewable and sustainable development sector. The Education and Skills Fund would support the priorities set out in the detailed Employment, Skills and Supply Chain Plan. A payment of £50,000 would be payable, annually, until the date of decommissioning.

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			If the Proposed Development receives consent, a detailed Employment, Skills and Supply Chain Plan will be developed, which would be subject to the approval of Buckinghamshire Council pursuant to the terms of the DCO. This would be a more detailed articulation of the principles and suggested actions set out in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3]**. Although the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3]** 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, with revisions to respond to contemporary circumstances. Thus, there will be a continuous programme of activity designed to deliver jobs and skills opportunities for young people that extends approximately 42 years beyond completion of construction.
9.3.15	REP1-191, REP1-214, REP1-218, REP1-250, REP1-251, REP1-257, REP1-300	**TCS Biosciences Limited** Comment that there would be a negative effect on TCS Biosciences Ltd. Other comments noted the potential for wider impact on the NHS and dependent industries.	The Applicant recognises the importance of TCS Biosciences Ltd as a supplier to the NHS. The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to 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. The Applicant's response to **Ref. 9.1.1** sets out the approach to iterative design development (including the movement of components such as the Rosefield Substation and BESS) informed by engagement to help avoid, reduce and/or minimise the potential for noise and accessibility effects. The Applicant's response to **Ref. 9.1.4** sets out the approach to consideration of engagement/feedback from TCS Biosciences Ltd and Prestons' Farm in updating management plans with bespoke mitigation, and providing further information relating to environmental effects on livestock. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1** to this document) 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 (**Annex A** - 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 WRs submitted by Preston Farms.
9.3.16	REP1-183, REP1-188 , REP1-189, REP1-191, REP1-197, REP1-198, REP1-214, REP1-217, REP1-218, REP1-236, REP1-240, REP1-281, REP1-	**Tenant farmers** Comment that there will be a negative socioeconomic impact on tenant farmers.	The Applicant's overarching position regarding the assessment of and mitigation / compensation for effects on agricultural landholdings and tenants, and non-agricultural businesses within and adjacent to the Order Limits is set out in response to **Ref. 9.1.3** in this table.

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	250, REP1-252, REP1-265, REP1-286, REP1-287, REP1-289, REP1-299		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].**
9.3.17	REP1-214	**Tenant farmers** Comment that the ExA should review the arrangements for land swaps with Tenants to ensure that Tenants' rights are secured without unacceptable pressure being applied by the landowners under Farm tenancy law.	Both remaining tenants are taking their own independent surveying and legal advice in respect of negotiations in respect of the land swap arrangements. The Applicant does not feel it is right to comment on the commercially confidential terms of any agreement.
9.3.18	REP1-136	**Tenant farmers** Comment that a tenant farmer was forced to leave a farm, and it was not a surrender as claimed by the Applicant.	As per the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** a tenant farmer surrendered their interest by agreement. No tenant farmer has been forced to leave.
		Effects on Tourism and the Visitor Economy	
9.3.19	REP1-177	**Impact on tourism** Comment that local tourism would be affected.	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]**). The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited and managed by embedded and additional mitigation.
9.3.20	REP1-220	**Impact on tourism** Comment that farm businesses which rely on tourism will face a general downturn in visitors due to the impact on the local road network.	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]**). There are no farm businesses that have been identified that rely on tourism in the local area. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited and managed by embedded and additional mitigation.
9.3.21	REP1-150, REP1-170, REP1-180, REP1-218, REP1-300	**Impact on local businesses** Comment that the proposed siting of infrastructure close to Hogshaw Farm and Wildlife Park is particularly concerning as its offering depends on visitors enjoying a peaceful countryside environment. Specific reference made to visual intrusion, noise and disruption from	The assessment of effects on tourism businesses – including 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 (including Hogshaw Farm and Wildlife Park) – however it is noted that mitigation is in place to address these effects and reduce the significance

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		construction which could deter visitors and impact the park's long-term viability.	as far as reasonably practicable, and that all other environmental effects on the receptor are not likely to be significant. In terms of the reported significant visual amenity effect experienced at Hogshaw Farm and Wildlife Park, the **Outline LEMP [EN010158/APP/7.6.3]** secures 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.
Effects on Community Access for Recreation and Connectivity Walkers, Cyclists and Horse Riders, including Public Rights of Way and Permissive Paths			
9.3.22	REP1-136, REP1-155, REP1-158, REP1-162, REP1-173, REP1-181, REP1-183, REP1-202, REP1-209, REP1-211, REP1-212 , REP1-226, REP1-234, REP1-247, REP1-253, REP1-254, REP1-259, REP1-263, REP1-266, REP1-267, REP1-271, REP1-275, REP1-283, REP1-288, REP1-293	**Loss of access** Comment that existing footpaths would be lost and that the proposed PRoW diversions would reduce access and enjoyment of the countryside and should not be allowed.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. A detailed assessment of effects on community access/walkers, cyclists and horse riders during construction, operation and decommissioning has been undertaken within the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. The construction of the Proposed Development would result in diversions to ECL/4/2, ECL/7/2, SCL/13/2, SCL/13/1 and SCL/12/2, which would become permanent and be place throughout the operation and decommissioning phases. Despite this, measures outlined in Section 6 of **Outline CTMP [EN010158/APP/7.5.3]** would limit disruption to users of PRoW and permissive paths, provide information and correct any damage caused by construction activity, and ensure safety of users. In light of this, the overall residual effect on community access/walkers, cyclists and horse riders during construction would be slight adverse and not significant. During operation, the combination of SCL/12/2 and SCL/13/2 which would decrease journey length, in addition to the creation of new permissive paths to increase community accessibility and connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon and Calvert would result in an overall permanent, slight beneficial effect (not significant).

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9.3.23	REP1-199	**Loss of access** Comment that there are footpaths and bridleways crossing Parcel 2 of the Site which are used frequently and the new rights of way proposed by the Applicant would not compensate for the loss of the present existing ones.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8.3]**. In addition, as set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**, the Bernwood Jubilee Way has been recognised as a longer distance promoted route. The Applicant has developed the design of the Proposed Development to protect the amenity of the Bernwood Jubilee Way as it runs through Parcel 2, between Botolph Claydon and Runts Wood. This has included offsetting the Solar PV development by 55m, rather than 10m, to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context. This would minimise the potential visual effects on users of the footpath and ensure no views towards Quainton Hill and its landscape context would be interrupted by the Proposed Development. A new permissive footpath is also proposed across Parcel 2, which connects the existing PRoW ECL/8/1 to PRoW ECL/9/2 and ECL/10/2 along the north of D3 (South). This would create a new circular route and offer alternative routes for users within Parcel 2.
9.3.24	REP1-199	**New footpaths** Comment that the new proposed footpaths would be unattractive due to visual intrusion, including lighting, and noise from the Proposed Development and therefore will not be used.	The proposed fenceline would be offset by 10m from the proposed permissive routes, in a similar way to the existing routes. As secured by the **Design Commitments [EN010158/APP/5.9.4]**, the perimeter fencing around the Solar PV development will comprise wooden and/or metal posts and wire mesh 'deer-proof fencing' and be no greater than 2.5m above ground level. The **Design Commitments [EN010158/APP/5.9.4]** also secure that there will be no permanent (continuous) lighting for security purposes, except where necessary to take account of health and safety requirements at emergency exits. This means that the perimeter fencing will not be lit and therefore the proposed footpaths will not be impacted by lighting along them. As set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2],** the construction-induced noise levels experienced by users of a proposed footpath would vary depending upon the type of works being undertaken and the separation distances between the works and the proposed footpath. It could be expected that users of proposed footpath within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre-construction ambient noise levels. However, given the nature of the works, the construction activities affecting an individual route would often be localised. Construction noise which is perceptible may change the experience of users of proposed footpath. However, it would not give rise to significant adverse effects when considered in line with planning policy.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			During the operation (including maintenance) phase, proposed sources of noise would be heavily mitigated, including low-noise equipment and use of perimeter barriers. Perceptible sound from the Proposed Development affecting PRoW and permissive paths would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits. As a result, no significant noise effects would occur.
9.3.25	REP1-146, REP1-152, REP1-241, REP1-254, REP1-267, REP1-282, REP1-283, REP1-293, REP1-294, REP1-298	**Construction** Comment that during the construction phase footpaths would be less accessible/less enjoyable.	A detailed assessment of effects on community access/walkers, cyclists and horse riders during construction has been undertaken within the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. The assessment notes that access to PRoWs would be maintained where practicable, with affected paths not being closed until the replacement has been completed to the satisfaction of the Local Highway Authority and is open for use. It should also be noted that short-term, temporary diversions to footpaths will only be required during track and cable trench construction activities when it will be necessary to form the access track across existing footpath alignments. In terms of construction phase environmental effects, several measures will be in place that would help to minimise disruption to community access across and within the Order Limits during construction, in addition to proposed temporary and permanent diversions. These include measures within Section 6 of the **Outline CTMP [EN010158/APP/7.5.3]** (On-Site Access Management Proposals) to limit disruption to users of PRoW and permissive paths, provide information and correct any damage caused by construction activity, and ensure safety of users. New signage and/or waymarking will be provided along diverted PRoW and permissive footpaths. Following the consideration of embedded and additional mitigation, during the construction phase, users of PRoW will experience: • Negligible to minor adverse (not significant) effects relating to noise and air quality - changes in amenity of PRoW would be limited spatially, and transitory; • At most negligible adverse (not significant) effects in terms of severance, non-motorised user amenity and fear and intimidation; • Non-significant effects (negligible or minor/minor to moderate adverse) for seven PRoWs (including NCN Route No. 51, PRoW between Three Points Lane and Splash Lane, and PRoW between Finemere Hill and HS2/Claydon Road, PRoW between Steeple Claydon and Calvert Road, PRoW, lanes and roads between East Claydon Road/Parcel 3 and Granborough/ Hogshaw Road, Three Points Lane and the PRoW extending to HS2, Swan's Way/Outer Aylesbury Ring); • Significant effects (moderate or moderate/major adverse) for six PRoW (including North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runt's Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3); and

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			• Slight adverse residual effect on community access (PRoW and Permissive Paths) and their users (WCH), which is considered to be not significant.
9.3.26	REP1-218, REP1-234, REP1-248, REP1-271, REP1-300	**General comment** Comment that IPs will no longer be able to use footpaths which are important for wellbeing.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8.3]**.
9.3.27	REP1-197, REP1-229	**Bridleways** Comment that the bridleway network is well used and important at keeping road-use to a minimum.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. There are no proposals to stop up or divert any bridleways. Effects on the connectivity / community access for all PRoW, including footpaths, bridleways, and byways, are assessed throughout the ES, including **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**.
9.3.28	REP1-217	**Bridleways** Comment that the Proposed Development would remove or severely affect one of the few remaining off-road bridleway routes available.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. There are no proposals to stop up or divert any bridleways. The 'Advice on solar farms near routes used by equestrians' (The British Horse Society, 2025) states that "*any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a bright day*." It also states that the BHS "*has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses*." The typical density of pedestrians and riders is low in a rural environment. There is little safety hazard associated with reflections towards an observer on a footpath or a bridleway, and any resultant effect is much less serious than, for example, on the road network. Furthermore, pedestrians or horses have more freedom to move beyond the solar reflection with little impact upon safety or amenity. Effects on all PRoW, including footpaths, bridleways, and byways, are assessed throughout the ES, including **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
9.3.29	REP1-217	**Bridleways** Comment that the documentation appears to reference footpaths but does not adequately address bridleways, despite much of the right-of-way network across the Site being designated for equestrian use.	Effects on all PRoW, including footpaths, bridleways, and byways, are assessed throughout the ES, including **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** makes specific reference to users of bridleways when assessing visual effects for users of recreational routes in section 10.10, including, but not limited to, assessment of users of Three Points Lane and the PRoW extending to HS2; PRoW between Three Points Lane and Splash Lane (Three Points Lane Bridleway); and PRoW between Botolph Claydon and Runt's Wood.
9.3.30	REP1-150	**Access to footpaths** Comment that the countryside surrounding Hogshaw is widely used by residents for walking, cycling and horse riding and access to public footpaths and bridleways is an important part of the local community's quality of life. Concern that the Proposed Development will result in a temporary or permanent closure of existing paths.	As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. The Proposed Development would increase access within the Site and enhance connectivity in the local area through the inclusion of three new operational (including maintenance) phase permissive footpaths. During the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. During the construction phase, five PRoWs would be permanently stopped up, but diversions would be provided in each case, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8.3]**. A detailed assessment of effects on community access/walkers, cyclists and horse riders during construction, operation and decommissioning has been undertaken within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** This includes effects on all PRoW, including footpaths, bridleways, and byways. The construction of the Proposed Development would result in diversions to ECL/4/2, ECL/7/2, SCL/13/2, SCL/13/1 and SCL/12/2, which would become permanent and be place throughout the operation and decommissioning phases. Despite this, measures outlined in Section 6 of **Outline CTMP [EN010158/APP/7.5.3]** would limit disruption to users of PRoW and permissive paths, provide information and correct any damage caused by construction activity, and ensure safety of users. In light of this, the overall residual effect on community access/walkers, cyclists and horse riders during construction would be slight adverse and not significant. During operation, the combination of SCL/12/2 and SCL/13/2 which would decrease journey length, in addition to the creation of new permissive paths to increase community accessibility and connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon and Calvert would result in an overall permanent, slight beneficial effect (not significant).

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
9.3.31	REP1-234, REP1-255, REP1-259, REP1-274	**Construction** Comment that the presence of heavy vehicles moving across fields and near footpaths/bridleways, and on roads would create potential safety risks during construction.	The **Outline CTMP [EN010158/APP/7.5.3]** secures appropriate mitigation to maintain the safety of users of footpaths, bridleways and the motorised highway during the construction phase.
9.3.32	REP1-292	**Bridleway** Comment that the Applicant should provide extra off-road bridleway routes during construction to mitigate for construction traffic using the only existing bridleway as the main access for construction traffic.	The main access points for construction traffic are located on Claydon Road, Granborough Road and the AILs access route from East Claydon Road. None of these locations correspond to an existing bridleway. **ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3.2]** [REP1-049] shows the locations where internal access tracks may cross PRoW, including bridleways, subject to the detailed design of the Proposed Development. As set out in the **Outline RoWAS [EN010158/APP/7.8.3]**, during the 30-month construction phase, existing PRoWs and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. The **Outline RoWAS [EN010158/APP/7.8.3]** also secures PRoW and permissive path protection during construction via temporary fencing or distancing tactics (via a banksman) as appropriate, ensuring users are protected from the construction works area and/or any crossing vehicular traffic.
		Other matters	
9.3.33	REP1-197, REP1-218, REP1-288	**Impact on local community** Comment that there would be a negative impact on the local community.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** presents an assessment of the likely significant effects arising from the construction, operation and decommissioning of the Proposed Development upon population and socio-economics, considering effects on the interaction between people, community facilities, social infrastructure, commercial land and property. It is concluded that there would not be any significant adverse effects on the local population or socio-economic conditions during the construction, operational and decommissioning phases. Construction would support up to 600 temporary full-time equivalent positions, with up to 24 permanent jobs during operation, alongside wider benefits from local spending and supply-chain activity, delivering a net positive effect for the local community. In addition to this, the Proposed Development would provide three new permissive paths during the operation (and maintenance) phase with a combined approximate length of 3.1 kilometres, increasing community accessibility and connectivity between existing public highway and community areas such as East Claydon, Middle Claydon, Botolph Claydon and Calvert. Effects on the agricultural economy are reported to be slight adverse and not significant in both the construction and operation (including maintenance) phases of development, due to the agricultural economy in Buckinghamshire being substantial and subject to annual/seasonal variations that are far greater than the indicative loss of employment capacity.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Effects on agricultural businesses and landholdings during the construction and operation (including maintenance) phases are reported to be temporary or permanent slight adverse so not significant in light of commercial agreements (including land swap and financial compensation) set to be in place and heads of terms having been agreed with all relevant tenants and landowners. Effects on other non-agricultural businesses are reported to be temporary or permanent and at most slight adverse during construction and temporary but long-term and at most slight adverse during operation (for Prestons' Farm / TCS Biosciences Ltd, Claydon House and Hogshaw Farm and Wildlife Park), resulting in an overarching non-significant effect. This is also due to commercial agreements (including land swap and financial compensation) and head of terms with all relevant tenants and landowners having been agreed, in addition to the implementation of embedded and additional mitigation reported in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049], ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2], ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2], ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** The construction of the Proposed Development would result in diversions to ECL/4/2, ECL/7/2, SCL/13/2, SCL/13/1 and SCL/12/2, which would become permanent and be in place throughout the operation and decommissioning phases. Despite this, measures outlined in Section 6 of **Outline CTMP [EN010158/APP/7.5.3]** would limit disruption to users of PRoW and permissive paths, provide information and correct any damage caused by construction activity, and ensure safety of users. In light of this, the overall residual effect on community access/walkers, cyclists and horse riders during construction would be slight adverse and not significant. During operation, the combination of SCL/12/2 and SCL/13/2 (which would decrease journey length), in addition to the creation of new permissive paths would result in an overall permanent, slight beneficial effect (not significant). The Health Effects Report (**Annex A** to the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3])** 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 4, 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

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			some localised, temporary and spatially-limited effects – however these are not likely to result in significant health effects at the assessed scale. Overall, the assessment confirms that the Proposed Development would not have a significant negative impact on the local community.
9.3.34	REP1-143, REP1-150, REP1-155, REP1-162, REP1-186, REP1-221, REP1-236, REP1-272	**Impact on local community** Comment that property prices near to the Proposed Development would decrease. Comment that the Applicant should commission a report to assess the impact on local property values.	National Planning Practice Guidance advises that in general, planning is concerned with land use in the public interest. As a result of this, the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be considered as a material planning consideration and is not a matter for assessment under the 2017 EIA Regulations. An assessment of the effects of development on property value was therefore considered to not be required as part of the socio-economic assessment within the EIA for the Proposed Development. The Applicant can confirm, however, that the ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** and **Outline LEMP [EN010158/APP/7.6.3].** No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live; and following the implementation of appropriate mitigation, no significant adverse environmental effects are expected on residential property from the Proposed Development on: air quality, cultural heritage, noise and vibration, or traffic and transport. Visual amenity aside, Part 1 of The Land Compensation Act 1973 (LCA) makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects (including noise, smoke and fumes, but not including loss of value due to a diminished view or visual impact) of the use of development works such as this. Notwithstanding this, the Applicant acknowledges representations from the local community about the potential effect of the Proposed Development on individual property values. The Applicant has designed the Proposed Development to limit impacts on properties in accordance with Project Principles set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]**. This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis and maintaining the rural separation between local villages.
9.3.35	REP1-173, REP1-199, REP1-219, REP1-221, REP1-252, REP1-264, REP1-286	**Impact on local community** Comment that there would be no benefit to the local community.	The Applicant has set out how the local community would benefit from the Proposed Development in the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (**see pages 550-551**). This includes potential economic benefits during the construction phase from employment, workforce spending and GVA/supply chain benefits as well as wider benefits such as the creation of new permissive pathways, the creation of a Community Fund and an Education and Skills Fund.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
9.3.36	REP1-159	**Socioeconomic benefits** Comment that positive socio-economic effects from the Proposed Development are overstated due to the likely peripatetic nature of the workforce.	**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 [EN010158/APP/7.14.3]**), and therefore would be able to work with the Applicant to direct measures to be secured within the Plan to the primary benefit of its residents and businesses.
9.3.37	REP1-145	**Applicant** Comment that the Applicant went to a local Skills Show to advertise job opportunities without planning permission, and query if this undermines the integrity of the planning process.	The Applicant's attendance at the Buckinghamshire Skills Show was not to advertise specific job opportunities for the Proposed Development. The Applicant was there to raise awareness of the wide range of occupations that are associated with solar and the wider renewables industry and to encourage and support local young people to consider training and career opportunities in this field.

Table 10-1: Soils (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Soils, Including Best and Most Versatile Agricultural Land	
10.1.1	CSAG (Page 22, Para. 96)	Comment noting that the Applicant did not undertake soil sampling until after the Site was selected which meant the Site selection process could not determine whether or not land within the Order Limits was BMV.	As is common practice, the Site selection process used Natural England's regional agricultural land classification maps to consider the best location for the Site as mentioned within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. It is impractical to complete a detailed ALC surveys prior to the Site being selected as a detailed ALC survey requires augers to be taken on a 1 per hectare scale and the search area was a 10km radius around the National Grid East Claydon Substation which would be the equivalent of approximately 31,400 augers. Moreover, a further difficulty to the point made by CSAG is that it is not possible to undertake ALC surveys on private land without consent from landowners. Such consent is difficult to obtain and not reasonably required to inform the Site selection process. Notwithstanding, the Proposed Development's Order Limits is concluded to have a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low, as shown within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]**.
10.1.2	CSAG (Page 215)	Comment noting that the farmland affected by the Proposed Development is better and more productive than the Natural England ALC maps indicate. In reality, land of 3b and 3a quality has been identified, which is described as moderate to good quality. Much of the land is farmed in an arable rotation and the loss to the local farming economy will be significant.	The detailed ALC survey set out in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]]** indicates that the land is 0.44% Grade 2, 1.07% Grade 3a, 4.07% non-agricultural and the rest of the Site is Grade 3b (non-BMV). These results and further information of the soils found across the Site can be found within **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2].** The results identified within the ALC report are more accurate and detailed than the provisional Natural England ALC maps. The economic impact of the loss of farming is assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** which concludes a slight adverse (not significant) effect for the effects on agricultural economy, agricultural business and landholdings.
10.1.3	CSAG (Page 216)	Comment noting that soils damage easily particularly during the construction phase or by heavy trafficking. The pressure to complete construction of the solar farm is likely to take priority over any damage to the soil.	Compaction and other soil damage have been assessed within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]** and mitigated for within the **Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.3].** Soil damage has been heavily considered and mitigated against. Mitigation measures include but are not limited to; only low-pressure vehicles will be allowed to drive on the grass in a straight line, a grass sward will be established at least six months prior to construction to prevent rutting and any vehicle turning will be on track mats at the end of each row and no soils will be handled when the soil is above the soil moisture limit.
10.1.4	CSAG (Page 218, Para. 2.5)	Comment noting concern at the likelihood of increased run-off from the panels and the risk of soil erosion, sedimentation and associated problems.	The rainfall runoff from solar panels would be to the ground within the 'rainfall gap' between panels. Any risk of channelisation if solar panels are arranged perpendicular to the contours of the Site would be managed through appropriate vegetation management, usually comprising vegetated strips around the periphery of the solar panels to reduce soil erosion. The Proposed Development will incorporate SuDs (Sustainable Drainage Systems), maintaining overland flow paths and ensuring attenuation is designed so that the Proposed Development does

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			not add to on or offsite flood risk during prolonged rainfall (**Outline Drainage Strategy [EN010158/APP/7.11.3]**).
10.1.5	CSAG (Page 220, Para. 4.1)	Comment noting that the ALC report produced for the Proposed Development was not conducted at the full density of 1 per hectare as is recommended by Natural England. There is evidence from other ALC surveys of the presence of more BMV land. Part of the Site was surveyed for the HS2 route and some additional Grade 3a land was found. The submitted ALC report suggests that part of the Site is Grade 5 land which is incorrect.	The detailed ALC survey has been undertaken in line with Natural England Guidance as agreed and set out in **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]**. The detailed ALC results confirm that the land is 0.44% Grade 2, 1.07% Grade 3a, 4.07% non-agricultural and the rest of the Site is Grade 3b (non-BMV). These results and further information of the soils found across the Site can be found within **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2].** No Grade 5 has been reported within the submitted report. The HS2 report does not contain an auger log with evidence of a survey point within the Site area. Specially trained ALC surveyors have examined the area and determined the Grade to be 3b. These results have been cross validated by lab analysis and individual surveyors, Natural England have also been consulted over the ALC results and have agreed with the final grading of the soils on this Site. The HS2 report also states that detailed ALC surveys have not been completed along the entire route and desk-based assessments have been used to predict ALC Grades therefore the Applicant is confident with the assignment of Grade 3b.
10.1.6	CSAG (Page 222 and 223, Paras. 5.1, 5.2 and 5.3)	Comment raising concern with the fact that soils are affected by compaction, especially during the construction phase of a solar farm project. Contractors are often under severe time pressure to complete construction and will sacrifice soils to complete their works. Compacted layers within the soil will affect drainage and construction may result in permanent harm and degradation of soil quality.	Compaction and other soil damage have been assessed and mitigated within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]** and **Outline SMP [EN010158/APP/7.7.3].** Soil damage has been heavily considered and measures have been included within **Outline SMP [EN010158/APP/7.7.3]** to reduce the compaction of the soil. Mitigation measures include but are not limited to; only low-pressure vehicles will be allowed to drive on the grass in a straight line, a grass sward will be established at least six months prior to construction to prevent rutting and any vehicle turning will be on track mats at the end of each row and no soils will be handled when the soil is above the soil moisture limit. Measures are secured and the main contractor will need to adhere to the measures within it.
10.1.7	CSAG (Page 223, Para. 5.5)	Comment noting that the submitted ALC and environmental assessments have failed to consider impacts on the existing land drainage, which could be severely damaged by the insertion of piles into the ground and from other construction operations, including trenching works. Damage to drainage systems has potential impacts on agricultural soil quality, including the risk of a permanent reduction of ALC quality following decommissioning and restoration.	The Defra 2025 ALC Guidance (JP-069) assumes that adequate land drains already been installed within a field so will therefore 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.
Implications of the Proposed Development on Food Production and Food Security			
10.1.8	CSAG (Page 215)	Comment noting that at a time where there are both food shortages across the globe and issues of food security, the loss of productive farmland should be avoided wherever possible. The Order Limits comprise moderate to good quality land well suited to mainly arable and	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		livestock agriculture and the loss to the local farming economy would be significant.	UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline SMP [EN010158/APP/7.7.3].** Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** submitted at Deadline 2. It is confirmed that no significant effects have been reported within this assessment. The Applicant maintains that the impacts of the Proposed Development on food production would not be significant. 94.42% of the Order Limits is ALC grade 3b, which is moderate quality land capable of producing moderate yields of a narrow range of arable/grass yields, and only 1.51% of the Order Limits is identified as being good or very good quality and capable of producing high yields of crops (this land is identified as Best and Most Versatile Land (BMV) (the remaining 4.07% is non-agricultural)). The economic impact of the loss of farming is assessed within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** which concludes a slight adverse (not significant) effect on the effects on agricultural economy, agricultural business and landholdings.
10.1.9	CSAG (Page 219, Para. 3.6)	Comment noting that the Order Limits comprise rotational grassland. Considering that not all land is suitable for cereal cropping, the loss of such land is likely to be significant, having an impact on local farms and the wider agricultural community.	The Solar PV areas will remain within a managed grassland with either a cutting regime or sheep grazing. Therefore, the land will not be lost from a grassland system and the soil be able to sequester carbon and improve water retention within operation. No significant effects have been reported for the effects on agricultural land quality or soil ecosystems as seen within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].**

Table 10-2: Soils (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Soils, Including Best and Most Versatile Agricultural Land	
10.2.1	Twyford Parish Council	Comment noting that solar farms render land virtually impossible to revert back to agriculture and that the whole estate would become a brownfield site.	Through proper use of the **Outline SMP [EN010158/APP/7.7.3]** soils will be protected and damage will be minimal and reversible at the end of the Proposed Development's lifetime. Many other approved DCO schemes, such as Longfield Solar Farm and Cleve Hill Solar Park have classified solar farms as temporary land take as any damage to the soils can be reversed through proper soil handling. In addition, the operational use of the Site as a solar farm has the potential to maintain or improve soil condition when compared with ongoing intensive agricultural use. The absence of regular ploughing, trafficking by heavy agricultural machinery and chemical inputs allows soil structure to stabilise, reduces compaction risk, and can support the recovery of soil organic matter and biological activity. The establishment and long-term maintenance of grassland beneath and between panels may therefore contribute to improved soil structure and resilience over time. In planning terms, the Site, once restored in accordance with the **Outline DEMP [EN010158/APP/7.4.3]**, would not be classified as brownfield land.
		Implications of the Proposed Development on Food Production and Food Security	
10.2.2	Grendon Underwood Parish Council (Page 2)	Commenting noting the loss of agricultural land and the impact this would have on food security.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** and no significant effects have been reported. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline SMP [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.
10.2.3	Edgcott Parish Council (Page 2)	Comment noting the risk to food security resulting from the loss of more agricultural land, especially in the context of global trading problems resulting from ongoing conflicts globally. Further comment noting that a lot of agricultural land has already been lost to infrastructure projects which has compromised food production.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site is considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** and no significant effects have been reported. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline SMP [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.
10.2.4	Edgcott Parish Council (Page 2)	Comment noting farmland already lost and continuing to be lost due to other infrastructure projects, which compromises food production.	The Applicant points to the above provided response in address of this comment.
10.2.5	Edgcott Parish Council (Page 2)	Comment noting that the Proposed Development is a catalyst for other nearby energy projects and contributes to the decline of agricultural land.	The Applicant disagrees with this assertion. The Applicant secured a grid connection agreement at National Grid East Claydon Substation, where there was capacity as set out within the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**. Subsequent projects which have been launched which also seek to connect at National Grid East Claydon Substation are not connected to or catalysed by the Proposed Development.
10.2.6	Twyford Parish Council	Comment that stress from HS2 and East West Rail has already contributed to the loss of food sources and that the Proposed Development would contribute to this.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site is considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** submitted at Deadline 2. It is confirmed that no significant effects have been reported within this assessment. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is a potential for livestock grazing during the operation of the Proposed Development therefore continuing food production uses. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline SMP [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.
10.2.7	East Claydon Parish Council (Page 1, Para. 3)	Comment that the Proposed Development would disrupt local food production for humans and animals.	The Applicant points to the above provided response in **Ref. 10.2.6**.

Table 10-3: Soils (Other Interested Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Soils, Including Best and Most Versatile Agricultural Land	
10.3.1	REP1-159	**Approach to assessment** Disagreement that the temporary use of grade 3b agricultural land means the impact of its use is of a minor magnitude.	Using the IEMA (2022) Guide: A New Perspective on Land and Soil in EIA an ALC Grade of 3b will be medium sensitivity. A minor magnitude has been assessed as the damage is reversible and temporary which therefore causes a slight adverse (not significant) effect. This assessment is shown within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].**
10.3.2	REP1-159	**Approach to assessment** Disagreement that the use of agricultural land for the Proposed Development would be temporary in practice.	As the operation (including maintenance) phase of the Proposed Development is 40 years, the use of agricultural land is classified as temporary. The area of BMV land (10.2 ha, 1.51% of the Site, as concluded in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]**) would only be used for Solar PV and would be managed to prevent any long-term soil degradation. The Applicant has committed to returning the soil back to its pre-construction ALC grade following the decommissioning phase as set out and secured in the **Outline SMP [EN010158/APP/7.7.3].**
10.3.3	REP1-159	**Approach to assessment** Disagreement with the Applicant's assessment of the sensitivity of soils to handling and effects on soil ecosystems, citing the important of clay soils to carbon sequestration and water retention.	It has been recognised that the soil within the Order Limits is heavy textured (clay) so additional mitigations have been inbuilt into the **Outline SMP [EN010158/APP/7.7.3]** following further engagement with Natural England. Natural England is satisfied with the level of caution within the **Outline SMP [EN010158/APP/7.7.3]** to prevent structural damage to heavy textured soils as agreed and documented within the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025].** Whilst the topsoil texture across the Site are heavy textures, the field capacity days across the Site are 136-142 therefore as the FCD are below 150 the topsoil classification is Unit B (Orange). The topsoil classifications are correct and cross-validated between multiple trained surveyors and lab analysis. There is likely to be some grazing within the areas proposed for Solar PV. The removal of grazing from the assessment would not change the conclusions reached within the assessment however, as agricultural pressures would still be removed during the operation (including maintenance) phase of the Proposed Development and the area under the Solar PV would still be kept within a grassland system. These two activities would still result in the soil carbon, water retention and structure being improved under the Solar PV areas during operation therefore grazing being present or absent to the Site will not change the conclusions of the assessment.
10.3.4	REP1-143, REP1-199, REP1-250, REP1-278	**Agricultural Land Classification** Comment disputing the ALC grade of the land due to its high-quality yields.	ALC Grade is determined through the soil's physical characteristics and what is the most limiting properties within the soil. Land management practices and the yield performance of the soil are not factors considered within the ALC criteria. The ALC grades have been independently assessed by individual qualified surveyors, and the results 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]**. Further details of the ALC results are found within **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2].**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
10.3.5	REP1-263	**Agricultural Land Classification** Comment that the Proposed Development would use a substantial area of high-grade farmland.	NPS EN-3 (2023) places emphasis on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development results in a BMV land take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. However, the Applicant acknowledges that non-BMV land such as Grade 3b can still be productive. During operation, the Site would be managed as semi-permanent grassland, with the potential for sheep and/or cattle grazing within the Order Limits, thereby retaining an element of agricultural productivity alongside renewable energy generation. This represents a change in land use rather than the permanent loss of agricultural function. Chapter 8 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** provides evidence on the suitability of the proposed location for large-scale solar and more widely sets out the urgent need for renewable energy development.
10.3.6	REP1-225	**Construction** Comment that there would be soil compaction and hydrological disruption from construction traffic and access tracks.	The **Outline SMP [EN010158/APP/7.7.3]** outlines specific mitigation and management strategy to reduce compaction and hydrological disruption during the construction of the access tracks. This would involve track matting and low-pressure vehicles to prevent compaction. During the operation (including maintnenance) phase, the soil would be under a semi-permanent grassland managed through grazing and a cutting regime which would manage drainage. Further details on the operation (including maintenance) phase management strategy can be found within section 5 of the **Outline LEMP [EN010158/APP/7.6.3].**
10.3.7	REP1-136, REP1-199, REP1-227, REP1-250, REP1-252, REP1-287, REP1-288,	**Non-BMV land** Comment that non-BMV agricultural land is still productive and the land within the Order Limits produces high-quality yields.	The Applicant acknowledges that non-BMV land such as Grade 3b can still be productive. It is noted that the potential for sheep and/or cattle grazing within the Order Limits during the operational (including maintenance) phase would retain an element of agricultural use. NPS EN-3 (2023) recognises the productivity of non-BMV land, but places emphasis on large-scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. The Applicant has continually sought to minimise the use of Best and Most Versatile (BMV) agricultural land, by focusing the initial site selection exercise on areas identified as provisional Grades 3 and 4 by Defra and Natural England mapping, to the extent that only a very small proportion of BMV is included in the development area. The Proposed Development's results in a BMV take of 1.51% which, in the wider context of solar NSIPs, is exceptionally low. Chapter 8 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** provides evidence on the suitability of the proposed location for large-scale solar and more widely sets out the urgent need for renewable energy development.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Adequacy of Soil Management and Mitigation	
10.3.8	REP1-146, REP1-152, REP1-159, REP1-173, REP1-191, REP1-197, REP1-214, REP1-234, REP1-240, REP1-263, REP1-269, REP1-271, REP1-297	**Decommissioning** Comment that restoration of land to agriculture would be difficult/not possible and that restoration would take a long time due to compaction of clay soils and damage to soil structure.	The **Outline SMP [EN010158/APP/7.7.3]** describes the mitigation and management measures that will be followed to reduce impacts on soil. Track matting and low-pressure vehicles would be used to prevent compaction. During the operation (including maintenance) phase, the soil would be under a semi-permanent grassland managed through grazing and a cutting regime. Further details on the operation (including maintenance) phase management strategy can be found within section 5 of the **Outline LEMP [EN010158/APP/7.6.3].** Soil restoration and aftercare has been outlined within the **Outline SMP [EN010158/APP/7.7.3]** to ensure soils are being restored to their prior pre-construction ALC grade. Additional measures have been included to account for the heavy clay textures (such as restrictive handling during winter months, reduced soil bund height, only low-pressure vehicles driving in a straight line on the grass and all vehicle turning will occur on track matting). The mitigation measures have been discussed and agreed with Natural England to prevent any damage to soil structure.
10.3.9	REP1-159	**Soil management** Comment that clay soils should not be worked over the winter and that work should take place from April to September. Query whether this has been factored into the Applicant's construction programme.	It has been recognised that the soil within the Order Limits is heavy textured (clay) so additional mitigations have been inbuilt into the **Outline SMP [EN010158/APP/7.7.3]** following engagement with Natural England. Works involving trafficking over topsoil during the winter months will need to be carried out carefully, otherwise there may be an increased need for amelioration. Wherever possible, work in wetter conditions will be avoided. Natural England is now satisfied with the level of caution within the **Outline SMP [EN010158/APP/7.7.3]** to prevent structural damage to heavy textured soils which has been agreed and detailed in **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025].**
10.3.10	REP1-263	**Soil impacts** Comment that soil compaction from construction machinery, permanent shading under panels and altered drainage patterns will degrade the soil over time.	Compaction and other soil damage have been assessed within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]** and mitigated for within the **Outline SMP [EN010158/APP/7.7.3].** Shading beneath panels would be partial and intermittent and would not affect the underlying soil properties. While grass growth may be reduced in limited, localised areas directly beneath panels, this does not affect the underlying soil properties including soil texture, structure, depth or drainage. The maintenance of grassland beneath and between panels is compatible with shaded conditions and would protect soil structure throughout operation, with effects fully reversible after decommissioning. 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, this issue 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**.** During the operation (including maintenance) phase, the soil would be under a semi-permanent grassland managed through grazing and a cutting regime which would manage soil drainage.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Further details on the operation (including maintenance) phase management strategy can be found within section 5 of the **Outline LEMP [EN010158/APP/7.6.3].**
10.3.11	REP1-159	**Management** Disagreement with the viability of grazing sheep and cattle alongside the solar farm.	Normal agricultural use (e.g. arable and/or grazing as current) would continue in Work Nos 2B, 6, 7 and 10B (**Works Plans [EN010158/APP/2.3.3]** [REP1-005]) (all areas outside of main developable Parcels). Within the areas proposed for Solar PV development, grazing some sheep is a viable option that is used on several other solar farms, continuing food production uses. Lower stocking levels would be used than on a sheep farm to ensure that ecological management objectives can be achieved. Cattle grazing is also an option in habitat management areas. The removal of grazing from the assessment would not change the conclusions reached within the assessment however, as agricultural pressures would still be relieved during the operation (including maintenance) phase of the Proposed Development and the area under the Solar PV modules and habitat management areas would still be kept within a grassland system. These two activities would still result in the soil carbon and structure being improved under the Solar PV modules and habitat management areas during operation therefore grazing being present or absent to the Site will not change the conclusions of the assessment.
Implications of the Proposed Development on Food Production and Food Security			
10.3.12	REP1-120, REP1-136, REP1-137, REP1-139, REP1-143, REP1-144, REP1-145, REP1-146, REP1-147, REP1-151, REP1-152, REP1-161, REP1-169, REP1-173, REP1-174, REP1-175, REP1-178, REP1-179, REP1-183, REP1-184, REP1-186, REP1-187, REP1-191, REP1-193, REP1-197, REP1-198, REP1-199, REP1-207, REP1-209, REP1-211, REP1-213, REP1-214, REP1-215, REP1-217, REP1-219, REP1-222, REP1-226, REP1-227, REP1-232, REP1-234, REP1-238, REP1-240, REP1-242, REP1-250, REP1-256, REP1-258, REP1-261, REP1-262, REP1-263, REP1-265, REP1-267, REP1-271, REP1-276, REP1-278, REP1-281, REP1-284, REP1-286, REP1-287, REP1-289, REP1-299	**Principle of development** Comment opposing the use of agricultural land for ground-mounted solar farm, including that the Proposed Development would impact domestic food security.	The Applicant recognises the importance of agricultural use on national food security and confirms low-quality land has been prioritised for the Proposed Development - with 1.51% of the Site is considered to be BMV land. Food security has been assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** and no significant effects have been reported. The utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from the Proposed Development accounts for less than 0.004% of the UAA. The total area of land within Buckinghamshire is 187,400, therefore the Proposed Development would occupy 0.66% of the total region. Additionally, there is likely to be some livestock grazing during the operation (including maintenance) phase of the Proposed Development within the areas proposed for Solar PV, therefore continuing food production uses. Upon decommissioning, the soils would be reinstated to their pre-construction condition as secured in the **Outline SMP [EN010158/APP/7.7.3]** meaning it would be capable of agricultural production.

Table 11-1: Transport and Access (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on the Road Network and Road Users	
11.1.1	CSAG (Page 3, Para. 8)	Comment noting that the Proposed Development would add to the disruption among local communities, through noise and vibration, traffic and PRoW closures.	The Applicant has prepared a detailed review of construction phase traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. As set out in the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.3]**, there would be no permanent loss of PRoW or access to the countryside as a result of the Proposed Development. During the construction phase, five PRoWs would be stopped up to divert them to field boundaries. The diversions would be provided in each case prior to the stopping up, as described in section 4.3 of the **Outline RoWAS [EN010158/APP/7.8.3]**. During the 30-month construction phase, other existing PRoWs and permissive routes that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRoWs may need to be subject to temporary management around works areas. Where PRoWs are to be temporarily diverted, the duration of such a diversion in that area would be for a maximum period of 6 months. Sources of noise and vibration associated with the Proposed Development have been considered and assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** No noise effects are identified as being significant following the adoption of appropriate mitigation measures.
11.1.2	CSAG (Page 24, Para. 104 and Page 57, Para. 37)	Comment noting that the impacts of the Proposed Development's construction phase will exacerbate and prolong years of highways disruption caused by HS2 and EWR, for example, to local people.	Cumulative impacts are considered in the assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** No significant effects following mitigation are predicted.
11.1.3	CSAG (Page 39, Para. 178)	Comment that the cumulative impact on the local population of highway disruption and additional heavy goods traffic does not appear to have been addressed within the Environmental Statement.	Cumulative impacts are considered in the assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** for all classes of vehicles (Car/LGV, HGV and Total Traffic Flows). No significant effects following mitigation are predicted.
11.1.4	CSAG (Page 40, Paras. 179 and 180)	Comment that, cumulatively with EWR and HS2, there is a perfect storm of disruption to the provision of primary healthcare services in the rural community.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
11.1.5	CSAG (Page 259)	Comment noting damage to private vehicles and roads becoming impassable as a result of the construction phases of HS2 and EWR, reflecting that rural roads are highly sensitive to damage from HGVs. Further comment that the proposed construction route includes some of these vulnerable roads, damage to which would threaten the safety and convenience of other road users.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** [APP-058] and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4]** [APP-131]**.** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. The **Outline CTMP [EN010158/APP/7.5.3]** includes a Wear & Tear Agreement to ensure that the public road condition is guaranteed by the Applicant.
11.1.6	CSAG (Page 259)	Comment that Paras 4.6.4-8 of 6.4 Environmental Statement Volume 4 Appendix 15.1: Transport Assessment (APP-131) fails to state the width of the carriageway for Snake Lane/Fidlers Field, Claydon Road and Quainton Road. Further comment requesting clarification as to whether the width is sufficient enough along the entire length of the roads for two HGVs to pass safely without destroying road margins.	Sufficient width is available for passing traffic. This view is shared by Buckinghamshire Council who have expressed no concerns on the principal of access on the proposed roads. Should verge works be required, the **Draft DCO [EN010158/APP/3.1.4]** contains powers to effect such works, if deemed necessary by Buckinghamshire Council.
11.1.7	CSAG (Page 259)	Comment that the proposed site entrance on Claydon Road is at a location of well-known but unresolved flooding issues.	The detailed design of the access junctions will consider the drainage requirements required for technical approval. Where drainage enhancements are required, these will be provided.
11.1.8	CSAG (page 268)	Comment noting that increases in HGV traffic approach 60% on Station Road and Claydon Road and more than 4-fold on Snake Lane, meaning the fear and intimidation threshold is surpassed. This is based on IEMA Guidelines (2023).	The mitigation provided in **Outline CTMP [EN010158/APP/7.5.3]** addresses any significant effects predicted along the construction access route. Following the provision of mitigation, no significant effects are predicted.
11.1.9	CSAG (page 270)	Comment noting that critical junctions with limited visibility such as Lee Road/Claydon Road can lead to driver delays. Further comment about increased traffic leading to severance at locations like Hogshaw Farm.	The mitigation provided in **Outline CTMP [EN010158/APP/7.5.3],** including junction enhancements, addresses any significant effects predicted along the construction access route. Following the provision of mitigation, no significant effects are predicted.
		Adequacy of Construction Traffic Management	
11.1.10	National Trust (Construction Traffic, Page 2)	Comment that Claydon House must be referred to in the Outline CTMP as a historical visitor attraction close to the Order Limits, given the projected traffic movements during the construction phase.	Engagement with the National Trust is now provided for in the updated **Outline CTMP [EN010158/APP/7.5.3]** which was submitted at Deadline 1 and is referenced in the following comment.
11.1.11	National Trust (Construction Traffic, Page 2)	Comment that as the impact on the local highway network is highly likely, the Principal Contractor should regularly liaise with the National Trust at Claydon House to agree arrangements to minimise travel disruption for staff and visitors. Further comment suggesting the inclusion of the National Trust in paragraph 3.2.4 of the Outline CTMP.	Engagement with the National Trust is now provided for in the **Outline CTMP [EN010158/APP/7.5.3].**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
11.1.12	CSAG (page 266)	Comment noting safety concerns resulting from the proposed increase in traffic on local roads, particularly the number of HGVs. Further comment that the Applicant's approach to ensuring adherence with speed limits doesn't give confidence as the local roads won't be subject to new speed limits proposed in the Draft Development Consent Order.	The **Outline CTMP [EN010158/APP/7.5.3]** details a range of measures that will ensure contractor behaviour, including spot reviews and the use of GPS tracking. Further measures including tachograph reviews can also be undertaken to ensure speeds are adhered to.
11.1.13	CSAG (page 266)	Comment noting that the number and size of vehicles on narrow country lanes and numerous bends is as much of an issue as speed. Highlighted that the proposed construction route presents significant hazards to pedestrians, cyclists, and equestrians given the proximity to HGVs. Further comment about the nature of rural roads having either a narrow or no footpath, and no streetlighting which exacerbates the issue.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects on all road users are considered and found to be not significant, following the provision of mitigation. The assessment notes that the effects of the Proposed Development are temporary and not significant, following mitigation.
11.1.14	CSAG (page 266)	Comment noting that in the Outline Construction Traffic Management Plan damage to footpaths would not be resolved until the completion of construction, which could render it impassable for users particularly during the construction phase.	PRoW works are noted in the **Outline RoWAS [EN010158/APP/7.8.3]** to ensure the availability of PRoW routes.
11.1.15	CSAG (page 268)	Comment assuming that the proposed replacement of the National Grid substation would require AIL deliveries along the same route as that of other AILs along East Claydon Road. Further comment that the figure of 14 inbound AIL movements is disproportionate given the scale of the vehicles and need to dismantle street furniture.	AIL traffic must be escorted by the Police as required by law. This ensures that only oneAIL movement can occur at any one time, ensuring that there are no cumulative impacts with other schemes. The works required for AIL deliveries outlined in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** are required for the physical size of loads, rather than the number of loads.
11.1.16	CSAG (page 271)	Comment that none of the steps in the embedded mitigation would reduce the impact on local rural roads since the impact is the result of increased traffic flows, especially those associated with HGVs.	Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** These include embedded and additional measures. The subsequent assessment indicates that all effects are not significant.
11.1.17	CSAG (page 271)	Comment that despite assurances and controls, construction traffic from other infrastructure projects regularly follows non-designated routes through villages.	The **Outline CTMP [EN010158/APP/7.5.3]** details a range of measures that will ensure contractor behaviour, including spot reviews and the use of GPS tracking. Further measures including tachograph reviews can also be undertaken to ensure speeds are adhered to.
		Approach to Assessment	
11.1.18	CSAG (Page 32 and 33, Paras. 139, 140 and 141)	Comment noting that the Transport and Access Chapter's methodology is flawed in how it describes receptor sensitivity. Notably, *"where the road is a minor rural road, not constructed to accommodate frequent use by HGVs. Includes roads with traffic control signals, waiting and loading restrictions, traffic calming measures" – indicates a high sensitivity receptor. However, low sensitivity is ascribed to any "small rural settlement, few community or public facilities or services."*	The methodology used is taken direct from guidance as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** The assessment methodology comes directly from The Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (2023) and the Design Manual for Roads and Bridges LA 104: Environmental assessment and monitoring (2020), published by the Department for Transport (and others).

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Further comment noting that the categorisation of receptor sensitivity is unexplained or appears contradictory.	The methodology used is entirely standard and has been used in numerous other DCOs, Section 36, Section 37, etc. applications across the United Kingdom. The assessment has been reviewed and accepted by DCO hearings, public inquiries, stakeholder reviews and other external audits.
11.1.19	CSAG (Page 33, Para. 142)	Comment noting that residents of Snake Lane/Fidler Field and Claydon Road are ascribed low sensitivity in Table 15.9 of the Transport and Access Chapter, although they live on rural roads not designed for HGV traffic.	They are noted as Low sensitivity as per the category in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** as noted in Table 15.8, specifically *"Where a location is a small rural settlement, few community or public facilities or services".*
11.1.20	CSAG (Page 33, Paras. 143 and 144)	Comment that Paragraphs 15.6.14 to 15.6.7 of the Transport and Access Chapter, under the heading Magnitude of Effect, describe the range of impacts on receptors and references relevant guidance. However, Table 15.10 "Magnitude of Effect" setting out how levels of magnitude have been determined, does not include any of these impacts and disregards the guidance in its entirety. Instead, "Magnitude of Effect" is determined according to whether the effects are deemed to be "material in the decision-making process." Further comment noting that this approach is back to front and that the assessments of magnitude are subjective.	This comment is incorrect and the required guidance has been followed correctly to develop the assessment of effects. The effects and their sensitivity are correctly identified, in line with the required process and guidance.
11.1.21	CSAG (Page 33 and 34, Para. 145)	Comment noting the Transport and Access Chapter fails to follow its own methodology, Paragraph 145 provides an example with regard to Snake Lane/Fidlers Field.	This comment confuses the assessment of effect prior and following mitigation. The comment relating to Snake Lane/Fidler Field confuses the effects post mitigation as reported in Table 15.15 in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].**
11.1.22	CSAG (Page 34, Paras. 146 and 147)	Comment noting that Table 15.15 of the Transport and Access Chapter confusingly refers to Residual "Significance" of Effect, although Paragraph 15.6.19 says any low or negligible effects are not significant. Further comment that Paragraph 15.6.19 is unclear and creates confusion as there is no explanation of how magnitude of effects have been assessed.	Table 15.15 of **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** is standard for an assessment of this nature and reports any residual effects and whet their significance is. Paragraph 15.6.19 of **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** again is standard for an assessment of this nature and clarifies what effects are considered significant.
11.1.23	CSAG (Page 34, Para. 148)	Comment noting it is not clear why Table 15.15 of the Transport and Access Chapter includes a column relating to the duration of an effect as the operational and decommissioning phases are scoped out of the Environmental Statement.	Table 15.15 of **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** is entitled *"Residual effects during construction"*. It does not refer to operational or decommissioning effects. The effect duration states that any effects are solely related to construction and would not continue to other phases of the Proposed Development.
11.1.24	CSAG (Page 34, Para. 149)	Comment noting that there is no equivalent assessment of non-residual transport and access effects in the Transport and Access Chapter.	The effects have been reported in detail in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** with a whole summary table (Table 15.16) outlining the receptors, effects and residual effects.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The comment relating cumulative development is covered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].**
11.1.25	CSAG (Page 259 and 260)	Comment that they were unable to locate the data source for the traffic survey summary tables in the Applicant's submission.	The Department for Transport data used in the assessment is referenced in Page 16 of **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** This data is freely available from the link provided (https://roadtraffic.7dft.gov.uk/#6/55.254/-6.053/basemap-regions-countpoints) The ATC data used was specifically commissioned by an independent data collection specialist.
11.1.26	CSAG (Page 260)	Comment stating that there is no assessment of the number of pedestrians, cyclists or equestrians using the proposed construction route, and that their inclusion is important given their vulnerability when faced with large numbers of HGVs and no footpath for refuge.	Non-motorised users have been assessed along with all other road users in the assessment contained within **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].**
11.1.27	CSAG (page 260)	Comment noting that two other infrastructure projects are added to the baseline traffic in Table 15.5 of the Transport and Access Chapter but no provision has been made for the Statera BESS or the National Grid replacement substation which the Proposed Development is wholly dependent on.	The study area for the Proposed Development does not include the access roads used by the National Grid or Statera project. As such, there is no need to include them in the assessment, as they have no impact on the traffic assessments undertaken.
11.1.28	CSAG (page 261)	Comment stating that evidence derived from the analysis of impacts of local road closures must be included to help inform any planning decisions and traffic management schemes.	The Proposed Development is not proposing any road closures or diversions and as such is completely different in scale and impact than other major projects. Buckinghamshire Council, as local roads authority, has not raised any similar concerns.
11.1.29	CSAG (page 264)	Comment suggesting that the information/data provided on traffic, road closure etc. is used to inform the assessment of cumulative impacts arising from the construction period.	The Proposed Development is not proposing any road closures or diversion. The committed developments or relevance have been already considered in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** Buckinghamshire Council, as local roads authority, has not raised any similar concerns.
11.1.30	CSAG (page 270)	Comment stating it is unclear how the criteria for determining magnitude of impact has been translated into descriptions in Table 15.10 of the Transport and Access Chapter.	The assessment process is clearly identified in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** from Page 16 through to 23. Table 15.10 of **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** summarises the magnitude of effect, i.e., those that are material to the decision-making process.
11.1.31	CSAG (page 270)	Comment noting that the Applicant has not provided an explanation as to how each of the criteria (critical junctions, HGV and large vehicle movements, severance, etc.) has contributed to each assessment of individual roads and that in	The assessment presented in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** follows a set process as described from Page 16 to 23. This process is entirely standard for a development of this nature and follows the assessment steps correctly. Some level of professional judgement is allowed for in determining

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		the methodology it seems the assessment it based on opinion rather than any independent analysis.	significance as noted in Paragraph 15.6.20. This is the only area where this is allowed in the process.
11.1.32	CSAG (page 272)	Comment noting information on HS2 PRoW closures, and that it should be used to inform the assessment on cumulative impacts on the PRoW.	The proposed diversions of the existing PRoW have taken into consideration the HS2 Schedule 17 works to PRoW. None of the proposed HS2 works extend into the Order Limits and all proposed changes to PRoW as part of the Proposed Development connect back into the existing PRoW network at the Order Limits. Therefore, the routes would be on their current alignment at the interface with the HS2 works.
11.1.33	CSAG (page 323, row 31)	Comment asking the Applicant to provide details of proposed mitigation in relation to the proposed Buckinghamshire Greenway, which would pass through the Order Limits. Further comment asking how construction traffic is controlled where it crosses the northern edge of Field E11.	Discussions have been held between the Applicant and Buckinghamshire Council in relation to the Buckinghamshire Greenway. While the indicative route passes through the Order Limits, the land that the route 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 its current use following the completion of the Proposed Development's construction phase. The Applicant is therefore not delivering a new stretch of the Buckinghamshire Greenway as part of the Proposed Development. The **Outline Rights of Way and Access Strategy [EN010158/APP/7.8.3]** sets out how construction traffic will be controlled in relation to PRoW, such as at the northern edge of Field E11. This includes PRoW and permissive path protection during construction via temporary fencing or distancing tactics (via a banksman), employed as appropriate, ensuring users are protected from the construction works area and or any crossing vehicular traffic.
11.1.34	CSAG (page 323, row 33)	Comment asking what surveys the Applicant has undertaken in order to establish the effective width and structural suitability of roads for HGV traffic on the proposed construction traffic route.	None of the roads within the study area have any posted weight limits that would affect the access route. Buckinghamshire Council were consulted at length on the acceptability of the access route and as local road authority, have raised no concerns or objections to the route. The access route has been examined by a wide range of experts, including the principal engineer from EDF (one of the Applicant's parent companies) who has extensive experience in construction in rural areas. It is also worth noting that the roads are used by HGV traffic already, by farm vehicles, buses and (in part) by other construction projects (for the southern section) and the movement of railway locomotives to the Buckinghamshire Railway Centre, without issue.
11.1.35	CSAG (page 323, row 34)	Comment asking what plans the Applicant has to resolve flooding issues on Claydon Road before commencing construction works.	The design of the Site access junctions will address any current flooding/ponding issues that may occur at these locations. Specific designs will be produced for bellmouths or access roads within flood zones to improve drainage in those areas. The works will be undertaken as set out in the **Outline CTMP [EN010158/APP/7.5.3].**
11.1.36	CSAG (page 323, row 35)	Comment asking what consideration the Applicant has given to variations in traffic flows during the day and between days and the impacts of construction traffic on peak flows.	The assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** has used Annual Average Daily Flows (AADF) in accordance with good practice to account for seasonal variations. The network peak has been established from the traffic survey data and the majority of staff movements

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			will be complete prior to this network peak occurring. The HGV traffic in the peak hours is low in comparison.
11.1.37	CSAG (page 323, row 36)	Comment asking what the evidence base is for the Applicant's assessment of the nature and extent of impacts vulnerable road users.	The assessment has included the impacts on non-motorised users both external to the Site and those internal to the Proposed Development. The assessments contained in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** clearly review pedestrian delay, non-motorised amenity, fear & intimidation and road safety for users of roads leading to the construction area. Users of PRoW within the Site are also considered in the same assessment and further mitigation is provided in the **Outline CTMP [EN010158/APP/7.5.3]** and the **Outline RoWAS [EN010158/APP/7.8.3].**
11.1.38	CSAG (page 323, row 37)	Comment asking if the developer is proposing to use Three Points Lane for construction traffic access.	Construction traffic only crosses Three Points Lane as illustrated in the access junction drawings provided in the **Outline CTMP [EN010158/APP/7.5.3].** The speed limit is suggested to ensure the safe operation for all users.
11.1.39	CSAG (page 324, row 38)	Comment asking what provision would be made to move AILs over field SA56 and then across the Claydon Brook to Fields E10, E11 and E20.	The access from the public road is illustrated in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** in the route survey report section. Access roads equipped with drainage improvement features would be installed from the bellmouth to Fields E10, E11 and E20. A free span bridge is expected to be installed over Claydon Brook to allow for access to Field E10 without affecting the flow rates of the water body. The AIL route would be designed to allow for the manoeuvring of a typical AIL vehicle whilst respecting the minimum horizontal clearances from nearby National Grid pylon towers and associated vertical clearances from the OHL crossing those fields. The AIL route through the Order Limits, crossing Fields SA55-56, would be required to comply with the **Design Commitments [EN010158/APP/5.9.4]**, including design commitment B9 in relation to promoting longitudinal connectivity for flora and fauna along the riparian corridor; design commitment C7 in relation to avoiding root protection areas of trees and hedgerows as far as reasonably practicable; design commitment D1 in relation to using existing gaps in vegetation where practicable; and design commitments E3 and E4 in relation to surfacing with permeable materials and use of clear span bridge(s).
11.1.40	CSAG (page 324, row 39)	Comment asking what assessment has been made of the cumulative impacts of AIL deliveries for the three programmes.	AIL traffic must be escorted by the Police as required by law. This ensures that only on AIL movement can occur at any one time, ensuring that there are no cumulative impacts with other schemes. The detailed Construction Traffic Management Plan(s), based upon **Outline CTMP [EN010158/APP/7.5.3]** will address any further AIL cumulative measures that may occur, should project timescales result in AIL movements occurring in similar timescales.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
11.1.41	CSAG (page 324, row 40)	Comment requesting justification of assessment of receptor sensitivity and definition of Magnitude of Effect in accordance with the guidance to support the conclusion that residual impacts on Station Road, Snake Lane, Claydon Road and Granborough Road are Minor and Not Significant.	The assessment has been undertaken in line with the process described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** The provision of mitigation including **Outline CTMP [EN010158/APP/7.5.3]** and the **Outline RoWAS [EN010158/APP/7.8.3]** addresses the issues noted in the significant effects review and allows these effects to be reconsidered as not significant.
11.1.42	CSAG (page 324, row 41)	Comment requesting the inclusion of the construction of East Claydon substation in the analysis of cumulative impacts – within the context of Highways.	The substation is not yet committed and as such cannot be included in the assessment. Given the construction route for the National Grid development sits outside of the study area, due to a completely different access route, there are no cumulative effects to report.

Table 11-2: Transport and Access (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on the Road Network and Road Users	
11.2.1	Waddesdon Surgery (Paras. 2 and 3)	Comment that Quainton, Waddesdon and Hogshaw have been affected by HS2 road closures and that the Proposed Development's routing off the A41 would have a severe effect on meeting the healthcare needs of residents along and surrounding the construction route. Further comment that construction traffic would affect the time it takes for healthcare professionals to access patients and this may reduce the number of visits possible. Further comment that this has not been adequately considered as part of the DCO Application.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3]**. The construction phase traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
11.2.2	Waddesdon Surgery (Paras. 3 and 4)	Comment that the Proposed Development would impact the provision of emergency services, such as ambulances. Further comment noting an example of a delayed emergency response due to diversions on the A41.	No diversion or road closures are associated with the Proposed Development, so the reported concern is not one that would be associated with the movement of construction traffic.
11.2.3	Waddesdon Surgery (Para. 6)	Comment noting that district nursing and primary care, as well as the farming community, do not follow a typical urban 9-5 working pattern and, therefore, the Applicant's statement that staff would be at Construction Compounds before rush hour is invalid.	The review of peak hours has been taken directly from traffic surveys undertaken and summarised in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** This data supports the Applicant's view on when the peak road periods occur.
11.2.4	Hogshaw Farm & Wildlife Park LTD (Access and Infrastructure, Page 5)	Comment noting road closures and traffic issues in the area in recent years which have led to numerous complaints and requests for refunds at Hogshaw Farm & Wildlife Park. Further comment noting that these issues would only get worse given the peak number of construction vehicle movements proposed.	The Proposed Development does not require road closures during the construction phase. As such, the commercial concerns noted would not result from the Proposed Development's traffic flows.
11.2.5	Hogshaw Farm & Wildlife Park LTD (Access and Infrastructure, Page 5)	Comment noting that the ES assesses the highway effects would not materially affect visitors to Hogshaw Farm & Wildlife Park, however there is no clear analysis of how the Proposed Development's additional construction and operation impacts would work with the existing closures and traffic.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact tourist and visitor attractions. For example, no road closures or diversions such as those encountered with HS2 are proposed. Given that this business has continued through a far more intensive project that the Proposed Development, it is considered highly unlikely that the Proposed Development will have any measurable impact on business viability.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
11.2.6	Hogshaw Farm & Wildlife Park LTD (Access and Infrastructure, Page 5)	Comment noting that there is no assessment of the risks of HGVs passing a visitor attraction on a minor road. Further comment noting that reliable and safe access is key for visitors, especially school visits. Further comment noting the effect of traffic disruption on tourism and therefore the ability for the business to operate.	The introduction of construction traffic will not have a detrimental impact on the access junction as noted in the assessment provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]**. The operation of the access junction is a matter for the farm operator. The construction phase traffic volumes as such, that the junction capacity will not be impacted.
11.2.7	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Paragraph 50)	Comment noting that the proposed access to the entirety of Parcel 3 from Granborough Road (6/11) is not compatible with Preston Farms and TCS Biosciences' operation. The Proposed Development would introduce daily movements of construction workers' vehicles, HGVs and other construction traffic for a prolonged period of time.	Access into Parcel 3 is proposed from Granborough Road as this is the most appropriate and efficient form of access to the development area. This ensures that construction traffic does not pass through villages and settlements on the local road network leading from the A41. The access strategy on the public road allows for other road users to continue to access the length of Granborough Road and includes passing places to benefit all road users. Winslow Road is the only alternative access point into Parcel 3 from the local road network. There are no other locations where Parcel 3 abuts the highway. The **Outline CTMP [EN010158/APP/7.5.3]** provides specific provisions for Preston Farms and TCS Biosciences Ltd, as discussed with Buckinghamshire Council and includes measures to enable the safe movement of horses and sheep over the public road, a feature not currently available. Measures to ensure the safe movement of horses and sheep over internal access tracks are also provided. The locations of crossing facilities on internal access track will be discussed with TCS Biosciences Ltd and measures such as boundary treatments, fencing types, gates, etc will be discussed and agreed. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** all contain measures to mitigate effects of the internal access track into Parcel 3, including but not limited to low speed limits, advance notice of activities and biosecurity measures. A detailed response to the WRs from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at (**Appendix 1** to this document) 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.
11.2.8	Preston Farms and TCS Biosciences Ltd (TCS Biosciences WR, Paragraph 3)	Comment noting significant concerns with regards to increased movements of Rosefield employees, LGV, HGV and abnormal loads throughout the construction phase of the Proposed Development.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** No significant or long-term effects are predicted.
11.2.9	Grendon Underwood Parish Council (Page 2)	Comment noting an increase in traffic during the construction period and that this would do irretrievable damage to the rural area.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The proposed construction route does not use any of the local rural roads to the north of the A41 within the boundaries of Grendon Underwood Parish Council.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
11.2.10	Edgcott Parish Council (Page 3)	Comment noting that local roads have already been struggling and that the Proposed Development and other projects will only worsen the situation, especially during the construction phase.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** A cumulative assessment has been undertaken as noted in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. This indicates that there are no significant effects on the study area road network. The proposed construction route does not use any of the local rural roads to the north of the A41 within the boundaries of Edgcott Parish Council.

Table 11-3: Transport and Access (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Effects on the Road Network and Road Users	
11.3.1	REP1-136, REP1-140, REP1-143, REP1-148, REP1-149, REP1-158, REP1-159, REP1-161, REP1-170, REP1-175, REP1-177, REP1-178, REP1-181, REP1-183, REP1-184, REP1-188, REP1-189, REP1-190, REP1-192, REP1-198, REP1-218, REP1-210, REP1-211, REP1-212, REP1-215, REP1-219, REP1-222, REP1-228, REP1-229, REP1-230, REP1-234, REP1-235, REP1-236, REP1-238, REP1-247, REP1-253, REP1-256, REP1-259, REP1-261, REP1-268, REP1-270, REP1-271, REP1-274, REP1-275, REP1-276, REP1-278, REP1-286, REP1-290, REP1-291, REP1-293, REP1-295, REP1-300	**Damage to the local road network** Comments expressing concern that construction vehicles would damage the condition of the local road network. Specific comments noted local experience of damage to the surfaces of the road from other major projects in the area, including Snake Lane.	The **Outline CTMP [EN010158/APP/7.5.3]** includes a Wear & Tear Agreement to protect the condition of public roads used for construction access. The **Outline CTMP [EN010158/APP/7.5.3]** also commits the Applicant to undertaking repairs to Snake Lane/Fidlers Field, should the road be in poor condition at the start of construction works.
11.3.2	REP1-217	**Damage** Comment that there would be damage to foundations at listed buildings particularly in East & Botolph Claydon by excessive HGV and vehicle movements.	The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41, including Botolph Claydon and East Claydon, so no issues are anticipated. The access route to Site is described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Construction phase traffic will be controlled by the **Outline CTMP [EN010158/APP/7.5.3].**
11.3.3	REP1-140, REP1-141, REP1-142, REP1-143, REP1-148, REP1-149, REP1-150, REP1-152, REP1-155, REP1-157, REP1-162, REP1-164, REP1-170, REP1-178, REP1-181, REP1-182, REP1-183, REP1-184, REP1-188, REP1-190, REP1-192, REP1-195, REP1-197, REP1-200, REP1-211,	**Disruption to the local area** Comment that there would be disruption during the construction phase for neighbouring residents, including road closures and diversions, as well as traffic congestion. Specific comments mentioned subsequent impacts on local schools, GPs and businesses, and impacts to emergency services access. Other comments noted residential properties along access routes and difficulty leaving properties.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The traffic effects of the Proposed Development are temporary and not significant. No road closures or diversion are required during the construction phase.

Ref	WR	Summary Position	Applicant's Response
	REP1-212, REP1-214, REP1-218, REP1-219, REP1-221, REP1-222, REP1-234, REP1-235, REP1-237, REP1-240, REP1-246, REP1-247, REP1-252, REP1-253, REP1-254, REP1-255, REP1-259, REP1-266, REP1-267, REP1-275, REP1-276, REP1-278, REP1-282, REP1-286, REP1-290, REP1-291, REP1-293, REP1-300		
11.3.4	REP1-146, REP1-152, REP1-170	**Disruption to local business** Comment that construction traffic disruption will affect the viability of local businesses. Specific reference to Hogshaw Farm and Wildlife Park.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. As such, adverse impacts on local businesses are not predicted.
11.3.5	REP1-214	**Disruption to the local schools** Comment that there would be disruption for local School transport (Langston and Tasker Ltd the local bus company based in Steeple Claydon) in East Claydon Oving, Waddesdon and Buckingham together.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant and as such, unlikely to affect school bus movement.
11.3.6	REP1-120, REP1-136, REP1-140, REP1-143, REP1-148, REP1-149, REP1-150, REP1-152, REP1-157, REP1-161, REP1-162, REP1-175, REP1-183, REP1-184, REP1-185, REP1-187, REP1-189, REP1-190, REP1-192, REP1-199, REP1-200, REP1-202, REP1-208, REP1-210, REP1-212, REP1-215, REP1-217, REP1-222, REP1-228, REP1-229, REP1-235, REP1-238, REP1-246, REP1-248, REP1-257, REP1-259, REP1-263, REP1-266, REP1-270, REP1-271, REP1-283	**General comment** Comments opposing the Proposed Development due to the amount of traffic generated by the Proposed Development. Specific comments opposed a high volume of construction traffic travelling through Botolph Claydon and Quainton.	The access route to site is described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Construction traffic will be controlled by the **Outline CTMP [EN010158/APP/7.5.3].** The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41, including Botolph Claydon and Quainton.

Ref	WR	Summary Position	Applicant's Response
11.3.7	REP1-256	**General comment** Comment that it is unacceptable for workers to use roads through villages.	The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41. The access route to site is described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Construction traffic will be controlled by the **Outline CTMP [EN010158/APP/7.5.3].**
11.3.8	REP1-185	**General comment** Comment that all routes to the Site through all the surrounding villages will be dominated by construction traffic.	The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41. The access route to site is described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Construction traffic will be controlled by the **Outline CTMP [EN010158/APP/7.5.3].**
11.3.9	REP1-263	**Operation** Comment that the Proposed Development would require maintenance visits adding to long term traffic movements.	Maintenance visits are required and are detailed in Section 5.6 of **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Up to 24 LGV journeys per day are predicted to cater for cleaning of Solar PV panels and general site maintenance.
11.3.10	REP1-140, REP1-145, REP1-146, REP1-150, REP1-152, REP1-159, REP1-175, REP1-180, REP1-181, REP1-183, REP1-188, REP1-189, REP1-191, REP1-195, REP1-197, REP1-200, REP1-209, REP1-210, REP1-212, REP1-214, REP1-218, REP1-219, REP1-222, REP1-223, REP1-228, REP1-229, REP1-230, REP1-234, REP1-235, REP1-238, REP1-240, REP1-255, REP1-259, REP1-263, REP1-266, REP1-270, REP1-276, REP1-292, REP1-298, REP1-300	**Road safety** Impact of construction on the safety of other road users during the construction phase due to increased traffic, such as cars, pedestrians, equestrians and cyclists. Specific comments mention issues with speeding from HGVs associated with other major projects in the area through local villages and narrow pavements in villages.	The construction route has been selected to ensure that it does not pass through local villages, located to the north of the A41. The access route to site is described in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Construction traffic will be controlled by the **Outline CTMP [EN010158/APP/7.5.3].** Consideration for all road users has been made. The assessments notes that following the provision of mitigation, there are no significant effects for road users.
11.3.11	REP1-145	**Road safety** Concern for families visiting Hogshaw Farm and Wildlife Park needing to pull out of the carpark with not great visibility with large construction vehicles continually passing.	The visibility at this private access junction is a matter for the operator of the Farm and Wildlife Park. Construction traffic will be operating in a controlled manner along the entirety of the access route, as controlled by the measures noted in the **Outline CTMP [EN010158/APP/7.5.3].**
11.3.12	REP1-145	**Road safety** Comment that the bend on Claydon Road coming down from Botolph Claydon is a very dangerous turn and there are frequent accidents, and that this could be exacerbated by construction traffic.	All traffic at this junction will be in an East – West direction as controlled in the **Outline CTMP [EN010158/APP/7.5.3].** As such, the potential for incidents as described is reduced.

Ref	WR	Summary Position	Applicant's Response
11.3.13	REP1-137, REP1-140, REP1-150, REP1-151, REP1-152, REP1-157, REP1-161, REP1-164, REP1-167, REP1-171, REP1-175, REP1-177, REP1-185, REP1-187, REP1-188, REP1-189, REP1-191, REP1-192, REP1-195, REP1-198, REP1-201, REP1-202, REP1-212, REP1-215, REP1-219, REP1-223, REP1-228, REP1-234, REP1-235, REP1-237, REP1-238, REP1-240, REP1-246, REP1-247, REP1-248, REP1-249, REP1-252, REP1-253, REP1-254, REP1-255, REP1-273, REP1-259, REP1-263, REP1-266, REP1-270, REP1-274, REP1-275, REP1-276, REP1-279, REP1-282, REP1-283, REP1-290, REP1-292, REP1-293, REP1-295, REP1-300	**Suitability of the local road network** Concern that the local road network is unsuitable for construction traffic and/or HGVs. Comment that the local road network is unsuitable for AILs.	The AIL route proposed is a National Highways agreed AIL route and as such, is entirely suitable. The study area network is suitable for construction access as noted in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** This position is shared by Buckinghamshire Council, who as local roads authority, has no objection to the principal of the access route and consider it a suitable access route.
11.3.14	REP1-145	**Suitability of the local road network** Comment that Granborough/Hogshaw Road is a failed road and is not suitable for any kind of construction traffic.	Road improvements to Granborough Road are proposed and are detailed in the **Outline CTMP [EN010158/APP/7.5.3]** to enable safe and efficient access during the construction phase.
11.3.15	REP1-152	**Suitability of the local road network** Comment that Sandhill Road, the lanes to Winslow, the A413 links cannot cope with HGVs.	Sandhill Road and the lanes to Winslow are not being used for construction access. The construction access routes are from the A41 and are detailed in the **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].**
11.3.16	REP1-254, REP1-227, REP1-241, REP1-259, REP1-294	**Suitability of the local road network** Comment that emergency vehicles would not be able to access the Site in the event of a BESS fire as local roads are not suitable.	Emergency access is already available across the study area network. The works proposed to local roads noted in the **Outline CTMP [EN010158/APP/7.5.3]** will only enhance access**.** With regard for a BESS fire event, the Applicant has had and will continue to undertake regular discussions with Buckinghamshire and Milton Keynes Fire Authority (BMKFA) during the detailed design phase of the Proposed Development. The roads used to access the BESS site are adopted highways and maintained by the local authority and should be suitable for use by Emergency Vehicles. During the detailed design stage, an Emergency Response Plan would be prepared and agreed with BMKFA. This would be submitted as part of the discharge of requirements process prior to construction and is secured under the **Outline BSMP [EN010158/APP/7.9.3].** The Applicant has applied industry best practice to the design of the BESS and surrounding infrastructure, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale

Ref	WR	Summary Position	Applicant's Response
			Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems."
11.3.17	REP1-164, REP1-240	**Suitability of the local road network** Comment that there are problems with the proposed access route from the A41 via Snake Lane.	The Applicant is aware of current issues on Snake Lane/Fidlers Field and is proposing enhancements to the road should the road be in the same condition at the start of construction period.
11.3.18	REP1-171	**Suitability of the local road network** Comment that the access points into Parcel 2 and 3 are not suitable and pose road safety risk due to the nature of the roads.	The proposed access junctions detailed in **Outline CTMP [EN010158/APP/7.5.3]** meet current design guidance and are safely located and designed with appropriate visibility splays.
11.3.19	REP1-192	**Suitability of the local road network** Comment that the planned access points on Claydon Road/Granborough Road need to be rethought.	The proposed access junctions detailed in **Outline CTMP [EN010158/APP/7.5.3]** meet current design guidance and are safely located and designed with appropriate visibility splays.
11.3.20	REP1-192	**Suitability of the local road network** Comment that the ExA should visit the Site and drive between A41, Station Road, Snake Lane and Claydon Road to assess access into each of the parcels.	This is a matter for the ExA, noting that Buckinghamshire Council have no in-principal issues with the access route proposed.
		Adequacy of Construction Traffic Management	
11.3.21	REP1-148, REP1-155, REP1-164, REP1-189, REP1-192, REP1-195, REP1-219	**Enforcement** Concern that construction workers will not adhere to the construction management plan and/or drive recklessly, and that there will be no way to enforce this/previous enforcement measures have not worked.	The **Outline CTMP [EN010158/APP/7.5.3]** will control all vehicle movements through the setting the approved access route from the A41, access route monitoring, tracking and disciplinary measures. The majority of staff arriving on Site will be transported by bus as part of the Staff Travel Plan proposals contained in the detailed Construction Traffic Management Plan(s). Buses will be monitored for adherence to the CTMP requirements in the same way as HGV trips. The **Outline CTMP [EN010158/APP/7.5.3]** provides for review and communication lines between the Applicant, contractor and public to report any anti-social behaviour.
11.3.22	REP1-174, REP1-181, REP1-192, REP1-214	**Enforcement** Comment that other infrastructure projects have failed to listen to issues raised and control problems against commitments made.	The Applicant acknowledges that there have been traffic impacts in the area as a result of other developments and that is why the Applicant held numerous consultation meetings prior to the submission of the DCO Application. The **Outline CTMP [EN010158/APP/7.5.3]** includes measures such as minimum and guaranteed complaint responses, a matter that was directly requested by residents following experiences from other schemes.
11.3.23	REP1-191	**Mitigation** Comment that no mitigation strategy has been presented to prevent harm to road safety.	The proposed mitigation measures area outlined in **Outline CTMP [EN010158/APP/7.5.3].**
11.3.24	REP1-192	**Working hours** Comment that local farming workforces start at 6am-7am and rural businesses have start times at 8am and do not finish work until 6-7pm so it is not accurate for the oCTMP to say that construction staff travel will avoid peak commuter traffic flows.	The review of peak hours has been taken directly from traffic surveys undertaken and summarised in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** This data supports the Applicant's view on when the peak road periods occur.

Ref	WR	Summary Position	Applicant's Response
		Adequacy of assessments and surveys	
11.3.25	REP1-159	**Approach to assessment** Request that the Applicant clarify the methodology used to assess residual transport and access impacts.	The details are already provided in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** Details relating to traffic impact are provided in **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].**
11.3.26	REP1-170	**General comment** Comment that information on transport and access is inadequate and not realistic of the roads of access and disruption it will cause not only for the first year but longer term.	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** As noted in both documents, the assessment considers the peak of construction traffic to provide a worst-case scenario. The proposed mitigation measures outlined in **Outline CTMP [EN010158/APP/7.5.3]** will be available throughout the construction period and not just the peak period assessed.
11.3.27	REP1-140	**Transport Assessment** Comment that the Transport Assessment does not realistically give a representation of the small badly upkept single track and B roads that all the HGVs and workers cars will use.	**ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** provides a fair review of the current state of the study area road network at the time of writing.
11.3.28	REP1-140	**Transport Assessment** Comment that the assumption that workers would arrive before the main rush hour traffic shows the Applicant's lack of understanding about local communities and road usage for farming and local businesses.	The review of peak hours has been taken directly from traffic surveys undertaken and summarised in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** This data supports the Applicant's view on when the peak road periods occur.
		Other matters	
11.3.29	REP1-159	**AIL** Request that the Applicant confirms what steps it has taken to ensure the viability of the access route for AILs from East Claydon Road, including provision it has made to cross Claydon Brook and how AILs would cross fields SA55-56.	The access from the public road is illustrated in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** in the route survey report section. Access roads equipped with drainage improvement features (e.g: terram geocell filled with permeable material) would be installed from the bellmouth to fields E10, E11 and E20. A free span bridge is expected to be installed over Claydon Brook to allow for access to Field E10 without affecting the flow rates of the water body. The AIL route would be designed to allow for the manoeuvring of a typical AIL vehicle whilst respecting the minimum horizontal clearances from nearby National Grid pylon towers and vertical clearances from the OHL crossing those fields. The AIL route through the Order Limits, crossing Fields SA55-56, would be required to comply with the **Design Commitments [EN010158/APP/5.9.4]**, including Design Commitment B9 in relation to promoting longitudinal connectivity for flora and fauna along the riparian corridor; Design Commitment C7 in relation to avoiding root protection areas of trees and hedgerows as far as reasonably practicable; Design Commitment D1 in relation to using existing gaps in vegetation where practicable; and E3 and E4 in relation to surfacing with permeable materials and use of clear span bridge(s).

Ref	WR	Summary Position	Applicant's Response
11.3.30	REP1-159	**Three Points Lane** Request that the Applicant clarifies its intentions for the use of Three Points Lane.	Construction traffic would not travel along Three Points Lane. It would cross Three Points Lane between Fields SA12 and B23 (South) only, as indicated in **ES Volume 3, Figure 3.11: Indicative Location of Internal Access Tracks [EN010158/APP/6.3] [APP-063]**. The access point shown in **ES Volume 3, Figure 3.9: Indicative Construction and Operational Access [EN010158/APP/6.3] [APP-063]** into Field B20 would only be used during the operation (including maintenance) phase.

Table 12-1: Water Environment (including Flood Risk and Drainage) (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Flood Risk Within and Outside the Order Limits	
12.1.1	CSAG (Page 61, Row 2)	Comment that the Applicant's statement that there are no proposals to increase drainage of the Site may not be correct as recent interventions to improve drainage in Parcel 2 may have taken place and such drainage improvement works should have formed part of the DCO Application and been assessed in the Environmental Statement.	No drainage or other on-site works (other than surveys) have been carried out at the Site on behalf of the Applicant. The works described have no relationship with the Proposed Development and the Applicant does not currently own or manage the Site.

Table 12-2: Water Environment (including Flood Risk and Drainage) (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Effects on Flood Risk Within and Outside the Order Limits	
12.2.1	Twyford Parish Council	Comment that the Claydons are clay substrate and drainage in the area is a fine balance, noting that rain runoff from Solar PV modules would increase flood risk in an area already prone to flooding.	The proposed Solar PV development would not materially alter the established hydrological response of the Site. The PV panels themselves occupy only a proportion of the Site area and are mounted with gaps between and beneath arrays, allowing rainfall to continue to reach the ground and drain as existing. Runoff from the panels is dispersed at the base of each module rather than being directly concentrated into formal drainage systems, thereby maintaining a diffuse drainage pattern consistent with current greenfield conditions. With appropriate design measures, such as maintaining existing flow paths, avoiding compaction, and incorporating SuDS where necessary, the Proposed Development would ensure that runoff rates and volumes are controlled to greenfield-equivalent conditions (**Outline Drainage Strategy [EN010158/APP/7.11.3]**).

Table 12-3: Water Environment (including Flood Risk and Drainage) (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Adequacy of the Assessments, Including the Sequential and Exception Tests	
12.3.1	REP1-214	**Approach to assessment** Comment that there has been inadequate research on the potential flooding implications of the Proposed Development with inappropriate surveys.	The Applicant does not agree that the assessment is inadequate. **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** and supporting **Outline Drainage Strategy [EN010158/APP/7.11.3]** have been prepared in line with the requirements of the NPPF, PPG and relevant Environment Agency and LLFA guidance. The assessment is informed by appropriate site-specific surveys and robust baseline data, including topographical information, hydrological analysis and a review of all sources of flood risk. The level of survey and assessment undertaken is proportionate to the scale and nature of the Proposed Development and is consistent with standard industry practice. The appropriateness of the Flood Risk Assessment is agreed with the Environment Agency. The conclusions are clear that the scheme will manage surface water runoff to greenfield-equivalent rates and will not increase flood risk elsewhere.
12.3.2	REP1-159	**Approach to assessment** Request for the Applicant to clarify whether it has undertaken an independent analysis of flood risk or relied on the assessment carried out by Statera in relation to Planning Application 23/03875/AP, particularly given that it excluded the majority of the area covered by the Order Limits.	The flood modelling package has been issued to the Environment Agency for formal review and analysis as such independent review is not required. The flood model used a previously submitted and approved model covering the Claydon Brook Tributary with updates to account for changes to climate change. Hydraulic models such as this often extend both up and downstream of the subject area, and as such included some areas located outside of the Order Limits. For areas outside of the hydraulic model other available datasets have been utilised as the best available information including the Environment Agency national model datasets. This approach has been discussed with the Environment Agency.
12.3.3	REP1-159	**Flood risk analysis** Comment that the flood risk analysis fails to recognise that local flooding in the area around Parcel 3 is the result of overtopping of the Claydon Brook and its tributaries which the Applicant's proposed surface water management proposals do not address.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** has appropriately considered all relevant sources of flooding in accordance with national policy and guidance, including fluvial flooding associated with overtopping of the Claydon Brook and its tributaries. The mechanisms giving rise to localised flooding around Parcel 3 are therefore well understood and are acknowledged to be primarily driven by exceedance of watercourse capacity during extreme events. The hydraulic flood model included the Claydon Brook Tributary, watercourses located outside of the study area of the hydraulic model were subject to further pluvial and overland flow modelling or were assessed using national flood risk datasets. The proposed surface water management for the Site takes into account additional runoff generated from areas of hardstanding to ensure that the Proposed Development does not increase flood risk elsewhere and remains safe for its lifetime
12.3.4	REP1-159	**Climate change allowances** It is noted that Para. 3.2.11 of PDA-005 has been revised to say that the Statera (East Claydon BESS) modelling was undertaken for the 1 in 100 year plus 11 30% [sic] climate change storm event, equivalent to the 2050s 'Upper Higher' [sic] scenario. This is incorrect. 11% was the figure adopted by Statera. It should be noted also that, assuming a connection date for the Proposed Development in the early 2030s, a 40-year operational	For the Proposed Development, the climate change allowances have been applied in accordance with the latest Environment Agency guidance and are based on the anticipated lifetime of the Proposed Development. While it is recognised that a 40-year operation (including maintenance) phase extending from the early 2030s may fall within a higher allowance epoch (i.e. the 2070s). As such, revised hydraulic flood modelling has been undertaken for the Claydon Brook Tributary to account for the 30% uplift in river flows for the lifetime of the development. This approach has been agreed with the Environment Agency in the **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.2]**.

Ref	WR	Summary Position	Applicant's Response
		period takes it into the 2070s for which a 30% uplift should be applied.	
12.3.5	REP1-159	**Climate change allowances** Comment that Issue ID: EA07 of the EA's RR-081 suggests that a higher central and upper climate change allowance for the 2080s epoch should be considered. The Applicant counters this point with the suggestion that only the decommissioning phase would occur in the 2080s but the Applicant would continue to have responsibility for flood risk management until decommissioning is complete and the landholdings returned to their original owners.	Decommissioning of the Proposed Development is expected to be completed within 12 months from the starting date, as such will not extend significantly into the next climate change epoch for example if the Site is operational by 2031 then decommissioning will commence 2072 and be complete in 2073.
		Effects on Flood Risk Within and Outside the Order Limits	
12.3.6	REP1-146	**Biodiversity** Comment that there would be a risk of flooding which would affect biodiversity.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has not identified risk of flooding as an impact pathway with regards biodiversity. The Proposed Development is anticipated to have negligible impact on the existing flood regime. As such, no significant changes to flood risk are expected, and there should be no material adverse effects on local biodiversity arising from flooding as a result of the Proposed Development.
12.3.7	REP1-172, REP1-291	**General comment** Comment that some of the Site is prone to flooding.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** has appropriately considered all relevant sources of flooding in accordance with national policy and guidance.
12.3.8	REP1-172	**General comment** Comment that with increasingly heavy rainfall due to climate change, building on land that already acts as informal flood storage seems short-sighted.	The **Outline Drainage Strategy [EN010158/APP/7.11.3]** has been designed in accordance with current Environment Agency climate change allowances and incorporates appropriate mitigation, including attenuation and controlled discharge, to ensure runoff is managed to greenfield-equivalent rates. This approach ensures that the Proposed Development does not increase flood risk elsewhere and maintains, and where possible improves, the existing hydrological response of the site.
12.3.9	REP1-286	**General comment** Comment that the land is currently managed for drainage and without this there could be flooding outside of the Order Limits.	The **Outline Drainage Strategy [EN010158/APP/7.11.3]** includes appropriate attenuation, exceedance routing and maintenance provisions to ensure the Site continues to drain effectively for the lifetime of the Proposed Development. As such, the Proposed Development will not rely on informal or unmanaged processes but will provide a robust, designed system that maintains current drainage performance. On this basis, there would be no increased risk of flooding outside the Order Limits as a result of the Proposed Development.
12.3.10	REP1-159	**General comment** Comment that the Applicant has failed to assess potential flood risk impacts on receptors outside of the Order Limits.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** explicitly considers potential impacts on receptors beyond the Order Limits, in line with the requirements of the NPPF and PPG, which seek to ensure that development does not increase flood risk elsewhere.

Ref	WR	Summary Position	Applicant's Response
			The **Outline Drainage Strategy [EN010158/APP/7.11.3]** commits that runoff would be restricted to no more than 4l/s/ha, which is less than greenfield QBAR rate and manage volumes on site through attenuation and controlled discharge. This ensures that there is no increase in flow to downstream receptors or the wider catchment. Exceedance flows have also been considered to ensure that, in extreme events, runoff is safely routed without causing off-site impacts.
12.3.11	REP1-159	**Public Rights of Way** Comment that the Applicant has failed to assess potential flood risk impacts on users of PRoWs within the Order Limits.	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** has considered the safety of all site users, including those using PRoWs, in accordance with the requirements of the NPPF and PPG. The Proposed Development does not give rise to any increase in the risk of flooding to the PRoW users.
12.3.12	REP1-159	**Soil stripping** Request that the Applicant provide further evidence in relation to the possible impacts of soil-stripping on flood risk, which is planned across large areas, such as those for the project substation (Fields E11 and E20) bordered by Flood Zones 2 & 3, and the BESS in Fields D8 and D9, where there are issues with water emergence and flooding of the road even during dry weather.	Soil stripping will be temporary and managed through the **Outline CEMP [EN010158/APP/7.2.3]**, incorporating measures such as phased working, minimisation of exposed areas, and the use of temporary drainage controls (e.g. bunds, swales, and silt management measures) to maintain existing runoff pathways and prevent increased surface water flows. In relation to the Rosefield Substation and BESS, site-specific drainage strategies have been developed in the **Outline Drainage Strategy [EN010158/APP/7.11.3]**. These proposals include appropriate attenuation, controlled discharge, and where necessary localised land drainage to manage groundwater and surface water interactions and ensure that flood risk is not increased as a result of the Proposed Development.
Adequacy of the Proposed Mitigation Measures and how they would be Secured			
12.3.13	REP1-159	**Attenuation ponds** Request that the Applicant provide evidence that attenuation ponds will have sufficient capacity to prevent flooding during major storm events.	**Outline Drainage Strategy [EN010158/APP/7.11.3]** has been developed for the Proposed Development using current guidance from the, LLFA and IDB and Environment Agency and industry standards to calculate the required storage volume for the 1 in 100 year event including allowance for climate change. The final size and volume of ponds will be confirmed at detailed design. Detailed drainage design based on construction design will be submitted at the discharge of requirements stage.
12.3.14	REP1-214	**Field drains** Comment that the Proposed Development would destroy drainage in local fields that depend on using land drains and mole drains in the clay subsoil, and that these drainage systems would not be able to be maintained beneath solar panels.	Appropriate spacing between panel rows maintains access for ongoing land management, including drainage maintenance where required. As required by the **Outline CEMP [EN010158/APP/7.2.3]** land drainage system which are damaged would either be reinstated or diverted to ensure that there would be no lasting impact from the baseline.
12.3.15	REP1-159	**Mole drains** Request that the Applicant confirm what steps it will take to identify and replace mole drains to ensure effective land drainage.	Appropriate spacing between panel rows maintains access for ongoing land management, including drainage maintenance where required. As required by the **Outline CEMP [EN010158/APP/7.2.3]** land drainage system which are damaged would either be reinstated or diverted to ensure that there would be no lasting impact from the baseline.
12.3.16	REP1-159	**Swales** Comment that local flood events are often caused by over-topping of the Claydon Brook and its tributaries and	The **Outline Drainage Strategy [EN010158/APP/7.11.3]** proposed that the post-development runoff rates will be restricted to no more than 4l/s/ha, which is lower than existing greenfield QBAR runoff assuming conservative approach on the impermeability of the Proposed Substation.

Ref	WR	Summary Position	Applicant's Response
		so the suggestion of limiting run-off rates to current levels would not reduce the risk of flooding. Indeed, by directing outflows to focussed points of discharge into the brook is likely to exacerbate the situation at the point of discharge. Request that the Applicant confirm what detailed hydraulic studies have been undertaken to demonstrate how the proposed swales will contain run-off during a 1 in 30-year storm event without causing on-site or off-site flooding?	Runoff will be managed through a distributed SuDS approach (including swales), avoiding concentrated discharge and ensuring flows are attenuated and controlled before reaching the watercourse. Detailed design of drainage network and SuDS features using industry standard software and methodology including appropriate climate change allowances will be undertaken at detailed design to ensure they can accommodate runoff from the 1 in 100-year event without causing on-site or off-site flooding.

Table 13-1: Other Matters (SoCG Parties)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
Assessment of, and Effects from the Proposed Battery Energy Storage Systems			
13.1.1	CSAG (page 320, row 2)	Comment requesting assessment of potential risks of the development to TCS Biosciences, Hogshaw Wildlife Park, Claydon Park. This should include the risk of fires and thermal runaway.	A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk to people and animals remains very low. The closest receptor to the BESS (proposed to be located in Fields D8/D9) is Borshaw Farm, located 400m to the south (outside of the Order Limits), where the effects are judged to be very low within the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. Borshaw Farm is closer to the BESS than the Hogshaw Wildlife Park fields which are over 400m away. Therefore, applying professional judgement, it stands that the effects on Hogshaw Wildlife Park would also be very low in the event of a BESS incident. The fields directly south of the proposed BESS location (the 'TCS Bioscience Ltd fields') have also been reviewed and the hydrogen fluoride (HF) concentrations during a thermal runaway event have been investigated and compared against the Acute Exposure Guidelines Levels (AEGL). The AEGLs are levels that are used by emergency planners and responders when dealing with rare or accidental releases. The concentrations of exposure expected through plume modelling at the northern edge of these fields is significantly less than the Level 1 AEGL concentration limit of 869ug/m3. AEGLs are dictated by the severity of the toxic effects caused by exposure, with Level 1 being the least (notable discomfort) and Level 3 being the most severe. The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. The Applicant has investigated emission levels in the TCS Bioscience Ltd fields, closest to the BESS where horses from Preston Farms could be located. HF emission levels within the fields are below the AEGL Level 1 threshold and are below the EAL threshold at 55m (173ug/m3 / 0.2 PPM) from the worst-case BESS fire position (approx. 35m from the field line boundary adjacent to the BESS). The levels reported within these fields are below the EAL and AEGL limits, which are set considering all human health receptors including people with severe respiratory issues or vulnerable babies. This is considered to pose no significant risk to human receptors and no evidence has been presented to suggest these levels would pose a significant risk to horses. The probability of fire emissions impacting the location is also very low because horses are not located downwind of the prevailing wind direction from the BESS site. It is also expected that should a BESS fire occur then horses would move away from the northern end of the field, away from the fire. Emission levels at the far sides of the field are lower, less than 0.1 PPM. It is also expected that should a BESS fire occur then horses would move away from the northern end of the TCS Bioscience Ltd fields, away from the fire, which would result in the levels of HF concentrations at the southern end of these field being extremely low.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and submitted at Deadline 1 in the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. Given a potential BESS fire would be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against Acute Exposure Guidance Levels (AEGLs), which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population could experience, including susceptible individuals: • Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure; • Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and • Level 3 - Life-threatening health effects or death. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. This includes for a footpath receptor at a 50m distance from the BESS units. Therefore, the assessment shows that if the animals were 50m away from the BESS units then AEGL 1 levels relating to humans would not be exceeded. The UKHSA is a Statutory Consultee for the Proposed Development and discussions have taken place and a **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** has declared that the Applicant's BESS fire emission risk analysis and consequence modelling: '*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.'*
13.1.2	CSAG (page 323, row 27)	Comment stating that cumulative effects of the proposed BESS operating simultaneously with the approved Statera BESS should be considered.	The cumulative effects of the Proposed Development during the operation (including maintenance) phase alongside other existing developments and/or approved developments, including the approved Statera BESS (East Claydon BESS) has been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. A Layer of Protection Analysis has been carried out for the Proposed Development and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].**

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		Other	
13.1.3	CSAG (Page 47, Para. 214 and Page 57, Para. 32)	Comment that the Applicant's approach to the Environmental Statement is flawed and generally fails to follow the application of the mitigation hierarchy.	The Environmental Statement has been undertaken in line with the EIA 2017 Regulations as set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** [APP-048]. The EIA has been undertaken in accordance with the applicable legislation and guidance and this has been tailored to each environmental factor using industry standard methods and criteria, and professional opinion, where appropriate. The assessment approach and methodology for each environmental assessment factor is detailed within the respective environmental factor chapters provided in ES Volume 2. The mitigation hierarchy has been applied throughout the design development. As part of the EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible through design refinements and embedded mitigation as set out in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] and **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018]. This approach also informed the initial site selection process of the Order Limits as detailed in the **Site Selection Report** which forms Appendix 1 to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development.
13.1.4	CSAG Appendix (Pages 53 – 58)	Appendix 'Statutory pre-application consultation on proposed Rosefield Solar Farm Biodiversity Matters email' included within the WR, which provides a review of biodiversity information associated with the Proposed Development based on the Preliminary Environmental Information Report dated 3 December 2024.	The Applicant has provided a response to this point in **Appendix 2** to this document. It is noted that the PEIR was intended to provide a preliminary assessment accounting for the information available at the time of the assessment. It also set out the further work that was required to inform the content of the Environmental Statement, with additional surveys undertaken since the PEIR assessment which are detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]**. At each stage, the assessment to determine levels of significance was undertaken in accordance with CIEEM best practice guidance for ecological impact assessment. The Applicant believes survey work carried out has been sufficient to inform a robust assessment of the impacts of the Proposed Development.
13.1.5	CSAG Appendix (Pages 59 – 66)	Appendix 'Comments and observations on recent/current works in eastern part of application area email' included within the WR, which captures the following matters: • Identifies 'drainage works' that they consider are being carried out by the Proposed Development; • Concern as to whether the works have obtained appropriate land drainage consent; • Concern as to whether the works fall within the quarterly cut timber allowance or, in the alternative, require a felling licence; • Possible Great Crested Newt offences; and	No drainage or other on-site works (other than surveys) have been carried out at the Site on behalf of the Applicant. The works described have no relationship with the Proposed Development and the Applicant does not currently own or manage the Site.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		• Possible offences as regards bat roosts.	

Table 13-2: Other Matters (Other Public Authorities and Key Organisations)

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
Assessment of, and Effects from the Proposed Battery Energy Storage Systems			
13.2.1	Hogshaw Farm & Wildlife Park LTD (Battery Energy Storage Systems, Page 6)	Comment on wider concerns in relation to fire risk, emergency response and visitor perception. Further comment noting no site-specific assessment to demonstrate compatibility with a family wildlife attraction in close proximity.	A site-specific **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development including atmospheric dispersion modelling and was submitted at Deadline 1. This has demonstrated that the risk to the population remains very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and submitted at Deadline 1 in the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The closest receptor to the BESS (Borshaw Farm) where the effects are judged to be very low, is closer to the BESS than the fields within Hogshaw Wildife Park. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Boreshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. It can be concluded that the trace emission levels will be even lower at Hogshaw Wildlife Park in the event of BESS fire incident meaning that the short-term nature of a fire incident combined with trace levels toxic gas emissions would not pose a significant risk. In addition, Hogshaw Wildlife Park is not downwind of the prevailing wind direction. Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst-case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. Given a potential BESS fire would be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against Acute Exposure Guidance Levels (AEGLs), which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population could experience, including susceptible individuals: • Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure;

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			• Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and • Level 3 - Life-threatening health effects or death. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling "*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low".*
13.2.2	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Paragraph 58)	Comment noting concerns in relation to the proposed BESS infrastructure in Parcel 2 with respect to noise and disturbance, fire risk, emergency response, insurance implications and wider business continuity.	The Applicant has provided a response in **Appendix 1** to this document. A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk to the population is very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and was submitted at Deadline 1. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The TCS Biosciences Ltd fields to the south of the BESS (Fields D8 and D9 - (plot 6/2 and 4/11) have also been reviewed and the hydrogen fluoride (HF) concentrations during a thermal runaway event have been investigated and compared against the AEGL's (Acute Exposure Guidelines Levels) which are levels that are used by emergency planners and responders when dealing with rare or accidental releases. The concentrations of exposure expected through plume modelling at the northern edge of these fields is significantly less than the Level 1 AEGL concentration limit of 869ug/m3. AEGL levels are dictated by the severity of the toxic effects caused by exposure, with Level 1 being the least (notable discomfort) and Level 3 being the most severe. It is also expected that should a BESS fire occur then horses would move away from the Northern end of the field away from the fire which would result in the levels of HF concentrations at the southern end of TCS biosciences field being extremely low. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling: *provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.* Buckinghamshire and Milton Keynes Fire Authority (BMKFA) intervention to a BESS incident, in worst case scenarios would typically be limited to boundary cooling of adjacent BESS units to prevent the fire from spreading. This strategy would be finalised with BMKFA and be clearly communicated in the Emergency Response Plan: • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater runoff is contained and tested before release or, if necessary, removed by tanker and treated off-site.
13.2.3	Edgcott Parish Council (Page 2)	Comment that BESS, in particular the risk of fires, is a major concern. Further comment noting the difficult road access for emergency services in this context and that in the event of a fire the fire service would allow it to burn out and cause more environmental damage.	As outlined in the Applicant's **Outline BSMP [EN010158/APP/7.9.3]** "*As a minimum, the battery system will have completed unit or installation level UL 9540A (5th Edition) testing (Ref), the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026 revision) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc".* The Applicant has engaged with Buckinghamshire Fire Authority throughout the pre-application phase to ensure that all Fire & Rescue Service emergency response requirements for the Proposed Development are fulfilled. Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.2]**. Buckinghamshire and Milton Keynes Fire Authority (BMKFA) intervention to a BESS incident, in worst case scenarios would typically be limited to boundary cooling of adjacent BESS units to prevent the fire from spreading. The fire would be allowed to burn out. Using this assumption, a **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** has been prepared for the Proposed Development. This has demonstrated that the risk to the population remains very low. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling "*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors*

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			from chemicals emitted during a BESS fire event is likely to be low". Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst-case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. Given a potential BESS fire would be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against Acute Exposure Guidance Levels (AEGLs), which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population could experience, including susceptible individuals: • Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure; • Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and • Level 3 - Life-threatening health effects or death. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. Section 5.2.10 of the **Outline BSMP [EN010158/APP/7.9.3]** stipulates: Another plume assessment would be completed once the battery modules for the Proposed Development have been selected at detailed design to demonstrate that the risk of thermal runaway and impacts from such thermal runaway will be no worse than as assessed in the plume assessment submitted with the Application. This informs the design prior to construction and ensure specific battery chemistries are considered along with all appropriate safety mitigation measures being put in place. Section 3.1.1 of the **Outline BSMP [EN010158/APP/7.9.3]** defines the key safety objectives for the design of the BESS, two of the primary objectives are: • To ensure that any firefighting water run-off can be safely contained and tested for pollutants before release, reuse or, if necessary, removed by tanker and treated off-site and • To ensure that fire, smoke, and the spread of toxic gasses do not significantly affect occupants in surrounding buildings and areas, first respondents and the local community. Access to the BESS areas is suitable for construction traffic, involving larger vehicles than the fire service use. The proposed road improvement works noted in based upon **Outline CTMP [EN010158/APP/7.5.3]** will improve access for all users.

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
13.2.4	Twyford Parish Council	Comment noting concerns about fire risk from batteries. Further comment noting concerns over distance and access of BESS sites.	A site-specific **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development including atmospheric dispersion modelling and was submitted at Deadline 1. This has demonstrated that the risk to the population remains very low. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. As outlined in the Applicant's **Outline BSMP [EN010158/APP/7.9.3] "***As a minimum, the battery system will have completed unit or installation level UL 9540A (5th Edition) testing (Ref), the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026 revision) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc".* Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022].** The Applicant has engaged with Buckinghamshire Fire Authority throughout the pre-application phase to ensure that all Fire & Rescue Service emergency response requirements for the Proposed Development are fulfilled. Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.2]**. Buckinghamshire and Milton Keynes Fire Authority (BMKFA) intervention to a BESS incident, in worst case scenarios would typically be limited to boundary cooling of adjacent BESS units to prevent the fire from spreading. The fire would be allowed to burn out. The UKHSA is a Statutory Consultee for the Scheme and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling: *provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.*

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
			Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022].**
13.2.5	East Claydon Parish Council (Page 2, Para. 8)	Comment expressing concern about the fire safety hazard associated with BESS and any toxic gas production, and the impact on humans as well as horses and sheep. Further comment that it is unclear why there is need for another BESS as well as the already-approved one Statera are building.	A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk to the population remains very low. Please refer to **Ref. 13.1.1** for effects of BESS for Hogshaw Farm and TCS Biosciences. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and was submitted at Deadline 1 as part of the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). The assessment has been undertaken to be deliberately conservative to account for an extreme worst case scenario. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. The closest receptor to the BESS (Boreshaw Farm) where the effects are judged to be very low within the Plume Assessment Summary is closer to the BESS than the fields than Hogshaw Wildife Park. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Boreshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which "*no significant risks to public health are expected*", the EAL for HF is 0.2 PPM. It can be concluded that the trace emission levels will be even lower at Hogshaw Wildlife Park in the event of BESS fire incident meaning that the short term nature of a fire incident combined with trace levels toxic gas emissions would not pose a significant risk. In addition, Hogshaw Wildlife Park is not downwind of the prevailing wind direction. The **Statement of Need [EN010158/APP/5.6] [APP-036]** explains that flexible assets are needed to balance supply with demand and that national policy is supportive of solar that is co-located with storage to maximise the efficiency of land use. The inclusion of a BESS as associated

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			development to the main solar scheme will support the operation of the main solar scheme, allowing it to store energy generated by the main solar scheme and export it to the NETS when it is needed, thus enhancing the flexibility of the Proposed Development. Section 6.11 and Section 7.9 of the **Statement of Need [EN010158/APP/5.6]** **[APP-036]** explain how a co-located BESS could operate to support the main solar scheme thus ensuring that energy generated from the Proposed Development is dispatched to the national grid when it is most needed.
		Other	
13.2.6	Hogshaw Farm & Wildlife Park LTD (Adequacy of Assessment, Page 9)	Comment summarising the assessments made, and concluding that the material effect on their business and tourism to the local area have been understated.	Effects on the value and volume of the tourist economy and its components are considered in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** in accordance with NPS EN-1 (2023). This includes an assessment of the potential for the change in the tourist/visitor economy at an economic scale, driven by changes to facilities and assets that contribute to the draw and experience of tourists in the local area, contributing to the value and volume of the wider tourist economy. This draws on effects reported across the ES, that may influence the tourist economy and its components including: • Visual effects, noise, vibration, air quality effects experienced by people; and • Where activities in the area could reduce accessibility or present physical obstructions to recreational and tourist facilities including accommodation, natural and cultural heritage, PRoW and tourist attractions. The assessment concludes that it is likely that some tourist sector receptors (e.g. local recreational attractions including Hogshaw Farm and Wildlife Park) would experience significant effects on visual amenity, but there would be no other significant environmental effects, and no change in land or access to land used by Hogshaw Farm and Wildlife Park. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited geographically (to six PRoW experiencing significant visual effects) and managed by embedded and additional mitigation as far as reasonably practicable. An assessment of the potential for change to business viability (including driven by access and environmental amenity) has also been undertaken in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** where there may be the potential to affect the viability of businesses as a result of significant changes. These effects are limited geographically and not significant, with the exception of a small number of moderate and major residual adverse effects relating to landscape and visual amenity at Hogshaw Farm and Wildlife Park. In terms of the reported significant visual amenity effect experienced at Hogshaw Farm and Wildlife Park, the **Outline LEMP [EN010158/APP/7.6.3]** secures 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

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			Development. Embedded mitigation also includes 15m width belt of structural native woodland (early) planting along southern boundary of Fields D8, D9, D19 and D26. As such the Applicant considers that mitigation has been applied to reduce the significance of these effects as far as reasonably practicable, and with this mitigation in place and the reported residual effects in mind it is not considered that this would affect the viability of the businesses concerned given their diverse attraction and business model.
13.2.7	Hogshaw Farm & Wildlife Park LTD (Conclusion, Page 9)	Comment requesting the ExA carefully scrutinise the adequacy of the assessment on tourism. Further comment requesting an assessment which reflects the scale, duration, and significance of impacts on tourism as a receptor experiencing significant adverse visual effects.	The Applicant considers that tourism has been considered appropriately within the Environmental Statement, with any impacts being assessed in proportion to the nature of receptor and the likely pathways for effect. 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]**. The scale and diversity of the wider tourist economy is broad, and while change may be experienced by some receptors, this is limited and managed by embedded and additional mitigation.
13.2.8	Preston Farms and TCS Biosciences Ltd (Page 3, Para. 12)	Comment requesting that the ExA includes a site visit to the Preston Farms' holding in its schedule of visits.	The Applicant notes this comment.
13.2.9	Preston Farms and TCS Biosciences Ltd (Page 3, Para. 13)	Comment noting that TCS Biosciences and Preston Farms invite the Applicant to enter into a statement of common ground in order to narrow the issues and identify matters in dispute.	The Applicant confirms that they are happy to enter into a SoCG with TCS Biosciences and Preston Farms and has provided a draft for their review. It is intended that a draft SoCG will be submitted at Deadline 3.
13.2.10	Preston Farms and TCS Biosciences Ltd (Page 3, Para. 14)	Comment noting that the DCO Application should be amended to take account of the following: 1) Reduce construction disturbance by altering arrangements for access to Parcel 3. 2) Remove field E23 from the "Works", or at most use E23 for no more than a cable run, with access rights limited to works on the cable run. 3) Remove the land within Order Limits immediately to the south of field E23 from the Works, or at most use it for no more than a cable run, with access rights limited to works on the cable run. 4) Appropriately assess the risk that construction and operational impacts will disturb the Preston Farms	Access into Parcel 3 is proposed from Granborough Road as this is the most appropriate and efficient form of access to the development area. This ensures that construction traffic does not pass through villages and settlements on the local road network leading from the A41. The access strategy on the public road allows for other road users to continue to access the length of Granborough Road and includes passing places to benefit all road users. Winslow Road is the only alternative access point into Parcel 3 from the local road network. There are no other locations where Parcel 3 abuts the highway. The Applicant does not consider other options suitable. The **Outline CTMP [EN010158/APP/7.5.3]** provides specific provisions for Preston Farms and TCS Biosciences Ltd, as discussed with Buckinghamshire Council and includes measures to enable the safe movement of horses and sheep over the public road, a feature not currently available. Measures to ensure the safe movement of horses and sheep over internal access tracks are also provided.

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		livestock and put in place mitigation that will avoid that. 5) Appropriately assess the risk that construction and operational impacts will cause biosecurity breach or other contamination at Preston Farms land and put in place mitigation that will be sure to avoid that.	The locations of crossing facilities on internal access track will be discussed with TCS Biosciences Ltd and measures such as boundary treatments, fencing types, gates, etc will be discussed and agreed. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** all contain measures to mitigate effects of the internal access track into Parcel 3, including but not limited to low speed limits, advance notice of activities and biosecurity measures. It is not the Applicant's intention to remove Solar PV development from Field E23. Field E23 is required to ensure the Proposed Development delivers the maximum solar benefit. Parcel 3, of which E23 forms part, is located close to the existing National Grid East Claydon Substation, the proposed National Grid East Claydon Substation extension and the consented Statera BESS. The Applicant considers Field E23 is an appropriate location for PV solar development. The Applicant accepts that E23 will not form 'open grazing' but in recognition of the requirement to move animals around the wider holding the Applicant has committed to providing livestock corridors. At Deadline 1, the Applicant amended design commitment G2 within the **Design Commitments [EN010158/APP/5.9.4]** to specifically require the design and routing 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. At Deadline 2, a further update has been made to the **Design Commitments [EN010158/APP/5.9.4]** to secure a minimum width of 20m for the corridor. There is no proposed access route across Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004]) between Parcel 2 and Parcel 3 during the operational (including maintenance) phase of the Proposed Development. Access to Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004]) during the operational (including maintenance) phase will be limited to ad hoc, infrequent access for any necessary cabling maintenance works. The full extent of Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004]) will not be required for the Interconnecting Cable Corridor(s) between Parcels 2 and 3, only trenches up to a maximum width of 35m as secured by the **Design Commitments [EN010158/APP/5.9.4]**, with a maximum construction working width of up to 50m required as confirmed in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7]** [REP1-107]. **ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3.2]** [REP1-049] shows the indicative routes these will follow, but the whole fields are included within the Order Limits to allow flexibility in the final location of the Interconnecting Cable Corridor(s) at the detailed design stage. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** were updated at Deadline 1 to include management measures specifically in response to concerns raised about the impacts on the Prestons' businesses. These include measures relating to noise, communication and biosecurity.
13.2.11	Preston Farms and TCS Biosciences Ltd (Page 5, Para. 40)	Comment noting concern that the Proposed Development would compromise the operations of Preston Farms and TCS Biosciences through the following:	Responses to points 1 and 2 are provided at **Ref. 13.2.10** above. The Applicant has provided an overarching response in **Appendix 1** to this document. In terms of buffering of the Proposed Development, **Appendix 1: Green and Blue Infrastructure Parameters** to the **Outline LEMP [EN010158/APP/7.6.3]** indicates locations for strategic early

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		1) Extensive construction disruption to the holding. In particular, access to Parcel 3 from Granborough Road (6/11 on the Land Plans) would come across a key part of the holding and is not compatible with Preston Farms' operation. 2) The Proposed Development includes the compulsory acquisition of "field E23" (6/13 on the Land Plans) and placing solar panels there, as well as a cable run, and using E23 for general access to the rest of the solar farm. E23, of which Preston Farms is the tenant, lies in the centre of the holding and is essential for the movement of the livestock. Proposed movement corridors as a form of mitigation is not a suitable solution and field E23 must remain open and uncluttered. 3) The Proposed Development positions the solar farm substation in Parcel 3 adjacent to the holding, exposing livestock to disturbance. No details have been provided regarding necessary buffering and other measures to avoid disturbance of livestock. 4) The Proposed Development positions the solar farm BESS in Parcel 2 adjacent to the holding, exposing the livestock to disturbance. No details have been provided regarding necessary buffering and other measures to avoid disturbance of livestock. 5) The Proposed Development includes general access rights for each of fields 6/10, 6/11 and 6/12 (on the Land Plans), as well as cable rights. Like E23, fields 6/10, 6/11 and 6/12 are a central part of the holding, and tenanted by Preston Farms. The access rights sought would expose livestock to disturbance and obvious risk of contamination/breach of biosecurity.	planting along the western and southern boundaries of Parcel 3 in the vicinity of Rosefield Substation and along the eastern boundary of Parcel 2, in the vicinity of the BESS. Management Objective 3 of the **Outline LEMP [EN010158/APP/7.6.3]** identifies that these areas can be planted following DCO consent (if it is granted) and before construction is started as far as reasonably practicable. A phasing strategy for new planting will be developed at the detailed design stage of the Proposed Development within the detailed Landscape Ecological Management Plan(s). This will identify priority areas for new planting to be implemented. 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 addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' in **Outline CEMP [EN010158/APP/7.2.3]** would be implemented, where applicable. Where there is potential for works to give rise to medium or high impacts at noise sensitive receptors temporary noise barriers can be installed close to the noisy plant to reduce noise levels (where practicable) see **Outline CEMP [EN010158/APP/7.2.3]** for further information. Furthermore, noise barriers will be implemented during the operational stage of the Proposed Development to minimise noise emissions. Including BESS container areas, the Substation, the Central Inverters and the main Transformers within the Substation area. For further details regarding noise mitigation through the Operational Phase of the Proposed Development please refer to **Outline OEMP [EN010158/APP/7.3.3].** In addition, as indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, a number of the outline management plans were updated at Deadline 1 to include construction management measures specifically in response to concerns raised about the impacts on the Prestons' businesses. There is no proposed access route across Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**) between Site 2 and Site 3 during the operation (including maintenance) phase of the Proposed Development. Access to Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**) during the operational (including maintenance) phase will be limited to ad hoc, infrequent access for any necessary cabling maintenance works. The full extent of Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**) will not be required for the Interconnecting Cable Corridor(s) between Parcels 2 and 3, only trenches up to a maximum width of 35m as secured by the **Design Commitments [EN010158/APP/5.9.4]**, with a maximum construction working width of up to 50m required as confirmed in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**. **ES Volume 3, Figure 3.7: Indicative Cable Crossings and Cable Corridors [EN010158/APP/6.3.2] [REP1-049]** shows the indicative routes these will follow, but the whole fields are included within the Order Limits to allow flexibility in the final location of the Interconnecting Cable Corridor(s) at the detailed design stage. The same is true for Fields SA47-50 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**), with Field SA46 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**) containing the access route into Parcel 3, as

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			discussed above. Strict speed limits and biosecurity measures would be implemented for any access through these plots, as secured by the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline CTMP [EN010158/APP/7.5.3]** and **Outline DEMP [EN010158/APP/7.4.3]** all contain measures to mitigate effects of the internal access track into Parcel 3, including but not limited to low speed limits, advance notice of activities and biosecurity measures.
13.2.12	Preston Farms and TCS Biosciences Ltd (Page 6, Para. 43)	Comment noting that whilst the Applicant has proposed compensation/replacement land, the land is over to one side and therefore would fragment the holding. The suggested replacement land would also take time and considerable expense to be brought to standard.	The replacement land being offered by the Landowner is contiguous to land currently occupied by Preston Farms and therefore provides for an extension to the existing holding. Preston Farms Ltd was involved in the identification of the replacement land, the location of which is defined and agreed in the Heads of Terms which were signed in September 2025. The majority of the replacement land is currently in arable use with some areas of grazing. The Applicant is not aware of the intended use of the land by Preston Farms Ltd. If Preston Farms intend to use the land for a similar use then works required will be limited.
13.2.13	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms limited, Paras. 45 and 48)	Comment noting that a lack of replacement land would lead to an immediate and extremely significant impact on the supply of product. The replacement land under discussion is not a like for like swap and would take significant improvements involving time and expense to replicate the functionality that is being lost. Replacement land also does not address the fragmentation of the existing operational system.	As noted above, the replacement land is contiguous to land currently occupied by Preston Farms Ltd and therefore provides for an extension to the existing holding. Preston Farms Ltd was involved in the identification of the replacement land, the location of which is defined and agreed in the Heads of Terms which were signed in September 2025 The replacement land area is 136.15 acres which is slightly larger than the land occupied by Preston Farms that is required for the Proposed Development which is 135 acres. The majority of the replacement land is currently in arable use with some areas of grazing. The Applicant is not aware of the intended use of the land by Preston Farms Ltd. If Preston Farms Ltd intend to use the land for a similar arable use then works required will be limited.
13.2.14	Preston Farms and TCS Biosciences Ltd (WR and Evidence for Preston Farms Limited, Paras. 61 - 65)	Comment noting that Field E23 forms an important part of the coordinated movement and rotation system necessary to maintain efficient operation of the farm. The loss of this field alters the functionality of the holding as an integrated system. Rather than removing the field, the Applicant has proposed livestock corridors through solar panels, however, this is not a workable solution as horses are accustomed to open grazing conditions. Replacement land elsewhere does not maintain the internal configuration of the existing holding.	It is not the Applicant's intention to remove Solar PV development from Field E23. Field E23 is required to ensure the Proposed Development delivers the maximum solar benefit. Parcel 3, of which E23 forms part, is located close to the existing National Grid East Claydon Substation, the proposed National Grid East Claydon Substation extension and the consented East Claydon BESS. The Applicant considers E23 is an appropriate location for PV solar development. The Applicant accepts that E23 will not form 'open grazing' but in recognition of the requirement to move animals around the wider holding the Applicant has committed to providing livestock corridors. At Deadline 1, the Applicant amended design commitment G2 within the **Design Commitments [EN010158/APP/5.9.4]** to specifically require the design and routing 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. At Deadline 2, a further update has been made to the **Design Commitments [EN010158/APP/5.9.4]** to secure a minimum width of 20m for the corridor.
13.2.15	Preston Farms and TCS Biosciences Ltd (WR and	Comment noting that whilst cable connections to the grid may require certain land rights, the rights sought, extend	In respect of Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3]** [**REP1-004**]), tthe Applicant has confirmed, in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7]** [**REP1-107**], that rights are required for the construction of the connection cables, the presence of the cables

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	Evidence for Preston Farms Limited, Paras. 68, 69 and 70)	significantly beyond the physical cable corridor, specifically in the case of plots 6/10 and 6/12.	and any future, ad hoc maintenance. There is no proposed access route across Fields SA35-45 (plot 6/10) between Parcel 2 and Parcel 3 during the operation (including maintenance) phase of the Proposed Development. In respect of Fields SA47-50 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004])rights are required for both the construction and presence of the connection cable. Rights are also required for construction access to Parcel 3 and access to Parcel 3 during the operation (including maintenance) phase. Currently the rights sought cover the entirety of Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004])and Fields SA47-50 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004]) as the location of both the cable corridors and access routes is not yet defined. Once the cable corridors and access routes are defined the area impacted will be reduced to those specific corridors. This approach is well established in other DCO applications.
13.2.16	Grendon Underwood Parish Council (Page 2)	Comment noting that the Proposed Development doesn't constitute sustainable development that fulfils a social, economic, and environmental role, which is contrary to local and national policy.	The **Planning Statement [EN010158/APP/5.7.3]** [REP1-016] and **Statement of Need [EN010158/APP/5.6]** [APP-036] set out that the Proposed Development will deliver sustainable development through the delivery of low-carbon, low-cost and UK-located solar electricity generation. The Proposed Development would contribute towards local and national policy by: • Achieving Net Zero by 2050 and reducing emissions; • Increasing the security of energy supply; • Lowering the cost and increasing the affordability of generated electricity; and • Contributing to sustainable development and economic opportunities. This would help the UK diversify its energy supply, increase energy resilience, and support local and national carbon emission reduction targets. It would provide a reliable supply of electricity that seeks to help address the needs of the UK power market. 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.
13.2.17	Statkraft UK Limited (Paras. 1.2, 2.3, 2.4, 2.5 and 2.6)	Comment noting that East Claydon Energy Limited (ECEL) is a wholly owned subsidiary of Statkraft UK Limited and is promoting the East Claydon Greener Grid Park. The interface between ECEL's land interests and the Order Limits is the area marked 'SA57' on the Works Plan (referred to as the interface land). The Applicant is seeking powers to extinguish or suspend all private rights over that land pursuant to Article 25 of the draft DCO as well as additional rights to temporarily use the land during construction or for maintenance purposes pursuant to	For the avoidance of doubt, the area marked 'SA57' on the **Works Plans [EN010158/APP/2.3.3]** [REP1-005] is plot 7/2 on the **Land Plans [EN010158/APP/2.2.3]** [REP1-004] which is the plot in which Statkraft hold an option interest. The Applicant is not seeking the compulsory permanent acquisition of all interests and rights in land over plot 7/2. Rather, and as set out in the **Book of Reference [EN010158/APP/4.3.3],** the Applicant is seeking the permanent acquisition of new rights over plot 7/2 for the purposes of cabling for the Grid Connection Cabling Corridor (Work No. 6). The Applicant does not yet know the location of the connection to the National Grid East Claydon Substation (either existing or as extended), and therefore the route of the connection cable is not yet determined which is why the

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		Articles 31 and 32 of the draft DCO. The land identified by the Applicant for substation connection rights is a large area encompassing the Interface Land. The Proposed Development risks sterilising and frustrating the development of the East Claydon Project through permanent acquisition of the Interface Land and development in a manner that is incompatible with delivery of the grid connection works for the East Claydon Project. The tests for the compulsory acquisition of the land subject to Statkraft's Option have not been satisfied.	Applicant seeks rights over the entire plot at this stage. Once the connection point is known the Applicant will be able to refine and narrow the area of land over which rights are sought. The Applicant and Statkraft have agreed to negotiate an Interface and Cooperation Agreement as the most appropriate form of agreement (rather than protective provisions), which will ensure the interface between both schemes is managed. The Applicant notes that the overlap between the Option Land in which Statkraft holds its interest pursuant to its planning application for the East Claydon Greener Grid Park and the Order Limits is a small slither in the northwest corner of plot 7/2. Given both parties are seeking cabling rights, the Applicant is confident that both schemes are compatible and can co-exist.
13.2.18	Statkraft UK Limited (Para. 2.9)	Comment noting that the Applicant has not demonstrated that the entirety of the land that is the subject of substation connection rights is reasonably required for development. Any compelling case for the acquisition of the land is also diminished in relation to the Interface Land by the strong case in the public interest for the East Claydon Project, which is at risk of being sterilised by the compulsory acquisition powers sought. At present, Statkraft is not aware of any alternatives or modifications that have been explored by the Applicant with regard to the acquisition of rights over the Interface Land.	As set out in response to **Ref. 13.2.17** above, the Applicant does not yet know the location of the connection and therefore the route of the connection cable. Once known the Applicant will be able to refine the land over which rights are sought and will only require permanent rights over a narrow strip. The Applicant and Statkraft have agreed to negotiate an Interface and Cooperation Agreement to ensure that any interface between the schemes is managed and both developments can co-exist. The Applicant notes that the overlap between the Option Land in which Statkraft holds its interest pursuant to its planning application for the East Claydon Greener Grid Park and the Order Limits is a small slither in the northwest corner of plot 7/2. Given both parties are seeking cabling rights, the Applicant is confident that both schemes are compatible and can co-exist.
13.2.19	Statkraft UK Limited (Para. 3.2)	Comment noting that Statkraft requires satisfactory agreement with the Applicant that: I) Regulates securing of rights, including temporary use, over the Interface Land and delivery of works for the Rosefield Project; and II) Confirms that compulsory acquisition powers will not be exercised in relation to the Interface Land. To facilitate this, Statkraft requires further information from the Applicant on the design and layout of the substation connection works for the Proposed Development.	The Applicant and Statkraft have agreed to negotiate an Interface and Cooperation Agreement to ensure that any interface between the schemes is managed and both developments can co-exist. Until such time as an agreement is in place, the Applicant continues to seek the use of compulsory acquisition powers to ensure delivery of the Proposed Development.
13.2.20	Twyford Parish Council	Comment noting concerns over recycling of Solar PV modules and batteries.	The Applicant has considered the recycling of the Solar PV modules as set out in section 2.10 of the **Outline DEMP [EN010158/APP/7.4.3].** Solar PV modules are up to 99% recyclable, and the major components of the panels including the glass, aluminium and copper can all be recovered.
13.2.21	East Claydon Parish Council (Page 1, Para. 1)	Comment noting that a lot of residents are tenants in properties owned by the Claydon Estate and therefore	The Applicant does not know of any impediment to anyone who wishes to provide comment on the Proposed Development as a result of their tenancy arrangements and is committed to ensuring that everyone with an interest in the Proposed Development is able to do so during the

Ref	WR and Para. Ref.	Summary Position	Applicant's Response
		feel unable to voice their opposition for fear of losing their tenancies.	examination. To that end the Applicant has engaged in a number of activities to encourage public participation in the examination since the Application was accepted. This included directly writing to residents in the inner zone of consultation (3,039 addresses) with information about how to register as an Interested Party, holding a webinar for elected representatives on the examination process, responding to enquiries received through its communication channels and meeting with residents on request. While it is acknowledged that it is not possible to participate in the examination anonymously, it should be noted that no identifying information was required during the two phases of consultation during the pre-application period meaning feedback could be submitted anonymously.
13.2.22	East Claydon Parish Council (Page 2, Para. 5)	Comment stating that grid connection won't be before mid-2030s.	The Government's Clean Power 2030 Action Plan provides a framework for the prioritisation of grid connection offers for projects which align with NESO's advice on connections which are deliverable by 2030, and which can demonstrate that they have the means to deliver, while maintaining a robust pipeline of deliverable projects beyond 2030. New National Policy Statements for Energy were designated in January 2026, these revisions versus the previous NPSs for Energy (against which the Proposed Development will be assessed against) were intended to ensure that the NPSs reflect current energy policy, such that the investment required to achieve 'Clean Power by 2030' and Net Zero by 2050 can be delivered. In December 2025, NESO published the high-level results of its connection queue re-prioritisation process. This has sought to prioritise projects for delivery to achieve the Government's current capacity ranges. The Applicant has received confirmation that the solar element of the Proposed Development will receive an updated Gate 2 Phase 2 connection offer within the re-prioritised connections queue (i.e. connection between 2031 and 2035 inclusive). The Applicant has also received confirmation that the BESS element of the Proposed Development will receive an updated Gate 1 connection offer, the indicative dates of the connection window for the BESS have not yet been confirmed. The Proposed Development is needed to contribute to meeting the current capacity ranges, consistent with the Government's Clean Power aim as previously stated.
13.2.23	Hogshaw Parish Council	Comment noting objection to the impact of the Proposed Development on the area.	As part of the design development and EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible through design refinements and embedded mitigation as set out in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] and **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018].This approach also informed the initial site selection process of the Order Limits as detailed in the **Site Selection Report** which forms Appendix 1 to the **Planning Statement [EN010158/APP/5.7.3]** [REP1-016]. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development.

Table 13-3: Other Matters (Other Interested Parties)

Ref	WR	Summary Position	Applicant's Response
		Assessment of, and Effects from the Proposed Battery Energy Storage Systems	
13.3.1	REP1-137, REP1-138, REP1-139, REP1-141, REP1-145, REP1-149, REP1-150, REP1-151, REP1-152, REP1-154, REP1-158, REP1-162, REP1-168, REP1-173, REP1-175, REP1-177, REP1-178, REP1-179, REP1-182, REP1-185, REP1-186, REP1-189, REP1-193, REP1-197, REP1-200, REP1-201, REP1-202, REP1-208, REP1-209, REP1-210, REP1-212, REP1-213, REP1-214, REP1-223, REP1-226, REP1-227, REP1-229, REP1-230, REP1-232, REP1-238, REP1-234, REP1-237, REP1-239, REP1-241, REP1-246, REP1-247, REP1-249, REP1-251, REP1-253, REP1-254, REP1-257, REP1-258, REP1-259, REP1-266, REP1-267, REP1-269, REP1-271, REP1-273, REP1-275, REP1-282, REP1-284, REP1-293, REP1-294	**BESS safety** Comment that there are safety concerns due to the BESS element of the Proposed Development, including potential fire risk, thermal runaway and emission of toxic fumes from a fire event with health impacts.	A **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]** assessment has been carried out for the Proposed Development. This has demonstrated that the risk to the population remains very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and was submitted at Deadline 1. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius). A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].** The assessment has been undertaken to be deliberately conservative to account for an extreme worst case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident. Given a potential BESS fire would be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against Acute Exposure Guidance Levels (AEGLs), which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population could experience, including susceptible individuals: • Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure; • Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and • Level 3 - Life-threatening health effects or death. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low. Hazards of toxic gas concentrations are shown to be confined to the immediate surroundings (within 72m) of the BESS under thermal runaway. Worst case emission levels for all residential receptors within 1km of the BESS are at very low levels. Hydrogen Fluoride emissions at the closest residential receptor at 400 metres (Borshaw Farm) has been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs

Ref	WR	Summary Position	Applicant's Response
			represent a pollutant concentration in ambient air at which "no significant risks to public health are expected", the EAL for HF is 0.2 PPM. Trace emission levels are lower at other residential receptors meaning that the short term nature of a fire incident combined with trace levels toxic gas emissions would not pose a significant risk to public health. Section 5.2.10 of the **Outline BSMP [EN010158/APP/7.9.3]** stipulates: Another plume assessment would be completed once the battery modules for the Proposed Development have been selected at detailed design to demonstrate that the risk of thermal runaway and impacts from such thermal runaway will be no worse than as assessed in the plume assessment submitted with the Application. This informs the design prior to construction and ensure specific battery chemistries are considered along with all appropriate safety mitigation measures being put in place. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling: *provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.* Outcomes of this engagement are detailed in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022].**
13.3.2	REP1-159	**BESS safety** Comment that the Applicant should state the cumulative risk of fire from cumulative BESS developments and the number of batteries which will be replaced over time as the number of batteries increases the likelihood of a fire event.	The cumulative effects of the Proposed Development during the operation (including maintenance) phase alongside other existing developments and/or approved developments, including the approved Statera BESS (East Claydon BESS) has been considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]**. A Layer of Protection Analysis has been carried out and the risk of a thermal runaway event has been determined to be a very small risk of occurring with a probability of approximately 1 in 5804 years. This can be found in **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098].**
13.3.3	REP1-150, REP1-159, REP1-189, REP1-226, REP1-282	**Biodiversity** Comment that the Applicant has not appropriately considered potential effects from a battery fire on animals, including livestock and wildlife.	Please refer to response to **Ref. 13.1.1** as this relates to a similar question.
13.3.4	REP1-150, REP1-152, REP1-193, REP1-213	**Emergency Response Plan** Comment that the Emergency Response Plan should be published to provide reassurance.	In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with Buckinghamsire and Milton Keynes Fire Authority (BMKFA), setting out how they would respond to any BESS event. This will be produced within pre-construction stage as it will be technology specific. Initial details of the future emergency response plan can be found in section 6.3 of the **Outline BSMP [EN010158/APP/7.9.3].**

Ref	WR	Summary Position	Applicant's Response
			The Emergency Response Plan produced would incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. Given the buffer zones to all sensitive receptors, it is highly unlikely that evacuation plans would be required. During the planning and preliminary design stages of the project the Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems." Initial details of the future emergency response plan can be found in section 6.3 of the **Outline BSMP [EN010158/APP/7.9.3] [REP1-092].**
13.3.5	REP1-138, REP1-149, REP1-168, REP1-179, REP1-193, REP1-209, REP1-212, REP1-223, REP1-234, REP1-241, REP1-246, REP1-247, REP1-253, REP1-258, REP1-259, REP1-266, REP1-267, REP1-271, REP1-275, REP1-293, REP1-294	**Emergency services** Comment that the Proposed Development is in a rural area and therefore emergency response times may be longer than in urban areas.	Longer response times would not be a material issue for the Proposed Development as in the very unlikely event that a battery fire did occur, the layout has been designed to limit the fire to one enclosure due to the design of the BESS site. The assumption is that minimal intervention from Buckinghamshire and Milton Keynes Fire Authority (BMKFA) is required during a thermal runaway event. Boundary cooling of adjacent equipment could be carried out, and the BESS unit under thermal runaway would be allowed to burn out to remove the risk of stranded energy in the battery system. In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with BMKFA, setting out how they would respond to any BESS event. This can't be produced until the procurement stage as will be technology specific. The Emergency Response Plan produced would incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. Given the buffer zones to all sensitive receptors, it is highly unlikely that evacuation plans would be required.
13.3.6	REP1-186	**Principle of development** Comment that lithium-ion batteries only a 10-to-15-year lifespan before their efficiency reduces to point where their use is no longer economic and will need replacement.	Advancements in current BESS manufacturing have seen greater reliability with performance warranties in some cases extending to 17.5 years or above, resulting in a replacement rate of 1.5 sets across the service life of 40 years. This replacement rate is in line with other consented schemes such as Longfield Solar Farm and Stonestreet Green. The Applicant has collaborated with Tier 1 BESS manufacturers to ensure prospective BESS components could provide this durability.
		Overall Net Greenhouse Gas Emissions	
13.3.7	REP1-159	**Approach to assessment** Comment that the Applicant's GHG assessment has failed to consider heat losses from the BESS.	Whilst there will be some transmission and distribution (T&D) energy losses with the transfer of energy between the BESS and the grid, these have not been quantified in the GHG Assessment as part of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**. This is in line with the GHG Protocol, and the standard approach for assessing GHG emissions for solar and BESS developments, such as recently consented scheme Stonestreet Green Solar project. This

Ref	WR	Summary Position	Applicant's Response
			assessment has quantified the GHG emissions associated with the operation of the Proposed Development and generation of electricity, before any T&D losses.
13.3.8	REP1-159	**Approach to assessment** Request that the Applicant confirm whether it has considered the impact of topography on the efficiency of the solar panels as part of its GHG assessment	The impact of topography on the efficiency of the Solar PV modules has been considered as part of the GHG assessment.
13.3.9	REP1-159	**Approach to assessment** Comment that it is not clear what size grid connection the Applicant's GHG assessment has assumed	As detailed in paragraph 8.8.14 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051],** the Proposed Development is assumed to have an output capacity of 334.1 MW (as the final capacity is not know at this stage), and generation of 324,864 MWh in the first year of operation. The size of the grid connection does not influence the results of the GHG assessment.
13.3.10	REP1-139, REP1-146, REP1-177, REP1-193, REP1-211, REP1-250	**GHG Assessment** Query the carbon footprint made by producing, transporting, maintaining, dismantling and then disposing of or recycling the proposed panels.	A Greenhouse Gas (GHG) assessment has been undertaken and is provided in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051].** The GHG assessment of construction emissions has also calculated the life cycle emissions for the building materials and systems, accounting for their embodied and construction emissions. It also includes indirect emissions which would occur outside the Order Limits, but related to the activities of all stages of the Proposed Development, including those from: the extraction, manufacture, and transportation of construction products and materials to the Site; the transportation of workers to the Site; and off-site transportation and disposal of waste.
13.3.11	REP1-217	**GHG Assessment** Query the environmental cost of manufacturing, transporting, installing, and eventually decommissioning and disposing of panels and battery systems, including embedded carbon, waste management, and potential contamination risks from battery storage. Comment that it is not clear that the full life-cycle environmental impact has been transparently evaluated.	A Greenhouse Gas (GHG) assessment has been undertaken and is provided in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051].** The scope of the GHG assessment also includes the addition of GHG emissions directly from construction, operation (including maintenance), and decommissioning activities undertaken within the Order Limits, including fuel consumption. It also includes indirect emissions which would occur outside the Order Limits, but related to the activities of all stages of the Proposed Development, including those from: the extraction, manufacture, and transportation of construction products and materials to the Site; the transportation of workers to the Site; and off-site transportation and disposal of waste. The GHG assessment of construction emissions has also calculated the life cycle emissions for the building materials and systems, accounting for their embodied and construction emissions. The potential contamination risks from batteries are considered and assessed within **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** and associated mitigation to avoid and reduce any potential contamination is detailed and secured in the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3].**
13.3.12	REP1-213	**GHG Assessment** Comment that the solar PV would be manufactured in countries where coal is predominantly used which means	A full lifecycle GHG assessment has been conducted in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, which takes into account a reasonable worst-case assessment of the embodied emissions from Solar PV modules. This has used a wide range of data available

Ref	WR	Summary Position	Applicant's Response
		the environmental benefits/carbon footprint of the project may not be accurate.	from Environmental Product Declarations (EPDs) from Solar PV modules from a range of source countries (including those where coal is predominantly used) and includes the emissions of the manufacture and transport of these materials.
		Approach to EIA	
13.3.13	REP1-159	**Approach to EIA** Comment that the Applicant's EIA relies too much on the professional judgement of the authors, particularly when assessing the magnitude and materiality of impacts. The Applicant should justify the methods it has employed and assess the adequacy of the scales it has used.	The EIA has been undertaken in accordance with the applicable legislation and guidance and this has been tailored to each environmental factor using industry standard methods and criteria, and professional opinion, where appropriate, as set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048]**. The assessment approach and methodology for each environmental assessment factor is justified within the respective environmental factor chapters provided in ES Volume 2. Where professional opinion has been used in the EIA, this has been provided by a competent expert, as required by Regulation 14(4)(a) of the EIA Regulations. **ES Volume 4, Appendix 1.1: Statement of Competence [EN010158/APP/6.4] [APP-078]** includes a Statement of Competence which outlines the relevant experience, expertise and/or qualifications of the expert who have prepared the ES.
13.3.14	REP1-159	**PRoW** Comment that the Applicant's approach to assessing impacts on PRoWs obscures the full extent of impact by looking at each topic area in isolation and that the Applicant should look at each PRoW holistically.	The interaction and combination of different environmental residual (post-additional mitigation effects from the Proposed Developing affecting PRoW (intra-project effects) has been assessed and is provided in Table 17.4, 17.5 and 17.6 of **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** also provides a summary of all of the likely significant (moderate and above) and minor significance in-combination and cumulative effects reported within the ES, and describes them in terms of their relevance to health in-line with guidance - this includes a consideration of the in-combination effects on PRoW users.
13.3.15	REP1-159	**Methodology** Comment that the use of scoring systems with 3- or 4-point scales introduces an automatic bias.	The EIA has been undertaken in accordance with the applicable legislation and guidance and this has been tailored to each environmental factor using the relevant industry standard methods and prescribed criteria, and professional opinion, where appropriate, as set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048]**. For example, the criteria for the assessment of transport and access as detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** has been informed by the associated guidance provided in the Design Manual for Roads and Bridges LA 104: Environmental Assessment and Monitoring alongside the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (2023). The assessment approach and methodology for each environmental assessment factor is justified within the respective environmental factor chapters provided in ES Volume 2.
		Construction	

Ref	WR	Summary Position	Applicant's Response
13.3.16	REP1-152	**Air quality** Comment that dust during the construction phase would disrupt working outdoors.	Dust emissions can be effectively controlled by appropriate dust control measures. Mitigation measures are listed in **ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4] [APP-086]** and will be used to control potential dust and particulate matter emissions during the construction phase. Mitigation measures are documented within and will be secured by the **Outline CEMP [EN010158/APP/7.2.3].**
13.3.17	REP1-246	**Air quality** Comment that fumes during construction would affect local wildlife.	The assessment contained within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has been developed closely with the air quality assessment presented in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** where the latter assessment has not identified any significant air quality impacts on ecological receptors during either the construction or operation (including maintenance) phases and, as such, air quality impacts have not been identified as an impact pathway within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].** The **Outline OEMP [EN010158/APP/7.3.3]** identifies mitigation measures to reduce the effects of likely air quality impacts such as dust suppression.
13.3.18	REP1-202, REP1-209	**Air quality** Comment that there would be an increase in air pollution from construction traffic.	As per the paragraph 5.4.5 of the **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** a peak month of max 218 light duty vehicles and 141 heavy duty vehicles (HDVs) has been assumed. The Applicant accepts 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 paragraph 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 and therefore any increase in air pollution from construction traffic would be insignificant.
13.3.19	REP1-223, REP1-234	**Programme** Comment that the construction period is too long.	The construction period of 30 months has been assessed as the optimum to deliver the Proposed Development. The Proposed Development will be delivered in phases and will not be at peak in all areas simultaneously throughout the Site. Construction phase control mechanisms include normal hours of working and traffic management. These measures are set out in the **Outline CEMP [EN010158/APP/7.2.3],** and **Outline CTMP [EN010158/APP/7.5.3].** The construction phase will be minimised where possible but a realistic worst case assumption has been used for the purposes of assessment.
13.3.20	REP1-185	**Working hours** Comment that working days and hours are too many and too long.	Construction phase control mechanisms include normal hours of working and traffic management. These measures are set out in the **Outline CEMP [EN010158/APP/7.2.3],** and **Outli.** Both the **Outline CEMP** and **Outline CTMP** have been informed by the EIA and will guide the construction process, through environmental controls, in order to promote good construction practices and avoid adverse or nuisance-causing impacts during the construction phase.
		Consultation	
13.3.21	REP1-143	**Consultation**	The Applicant disagrees with this statement. Information presented at Phase Two Consultation (see **Consultation Report Appendices G-1 to G-3 [EN010158/APP/5.2] [APP-026]**) provided

Ref	WR	Summary Position	Applicant's Response
		Comment that misleading information was published at consultation to make the Proposed Development sound more attractive.	factual information about the Proposed Development, including its potential environmental effects (both positive and negative), enabling respondents to provide informed feedback on it.
13.3.22	REP1-140	**Consultation** Comment that the public consultation had minimal information and knowledge about the area, impact on wildlife, businesses and local area.	As set out in the **Consultation Report [EN010158/APP/5.1] [APP-020],** the Applicant published a wide range of materials to enable people to find out more about the Proposed Development at Phase Two Consultation. This included a Preliminary Environmental Information Report (see **Consultation Report Appendices I-1 [EN010158/APP/5.2] [APP-028]**) which set out a preliminary assessment of the potential environmental effects of the Proposed Development and potential mitigation measures.
13.3.23	REP1-187, REP1-188, REP1-212, REP1-214, REP1-222, REP1-223, REP1-224, REP1-234, REP1-241, REP1-247, REP1-253, REP1-275, REP1-282, REP1-293, REP1-294	**Engagement** Comment that residents may not be able to attend in-person events or comment on the proposals due to tenancy arrangements, or because it is difficult to navigate the planning process.	The Applicant does not know of any impediment to anyone who wishes to provide comment on the Proposed Development and is committed to ensuring that everyone with an interest in the Proposed Development is able to do so during the examination. To that end the Applicant has engaged in several activities to encourage public participation in the examination since the Application was accepted. This included directly writing to residents in the inner zone of consultation (3,039 addresses) with information about how to register as an Interested Party, holding a webinar for elected representatives on the examination process, responding to enquiries received through its communication channels and meeting with residents on request. While it is acknowledged that it is not possible to participate in the examination anonymously, it should be noted that no identifying information was required during the two phases of consultation during the pre-application period. In any case, the Applicant does not know any reason why anyone would not be able to submit information into the examination under their own name.
13.3.24	REP1-150	**Engagement** Comment that the DCO process is burdensome on local communities to engage with, necessitating time and resources to review and comment on large suites of documents, and that this imbalance is relied on by the Applicant.	The Applicant is committed to ensuring that everyone with an interest in the Proposed Development is able to engage in the DCO process. As well as directly writing to residents upon acceptance of the Application, the Applicant also held a webinar for elected representatives on the examination process and remains active in responding to enquiries received through communication channels.
13.3.25	REP1-140	**Feedback** Comment that response documents provided by the Applicant are in my opinion inadequate, particularly the access to fire services and infrastructure.	The Applicant considers that responses contained within **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** provide adequate information in response to points raised by Interested Parties. With specific reference to fire services and access to infrastructure, the Applicant has provided information on this in the Battery Storage section of Table 2.30 (pages 397 – 423).
13.3.26	REP1-150, REP1-214	**Feedback** Comment that the Applicant has not responded to issues raised by the community during pre-application period or changed the proposals in response to feedback.	As set out in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** the Applicant has made extensive changes to the Proposed Development as a result of feedback received through formal pre-application consultation and ongoing engagement. Changes made in direct response to feedback received at each stage of consultation have been summarised in the

Ref	WR	Summary Position	Applicant's Response
			Consultation Report [EN010158/APP/5.1] [APP-020] (sections 2.6, 6.5 and 7.5), and in more detail in the following **Consultation Report [EN010158/APP/5.1]** [APP-020]: • A-4: Summary of responses to Phase One Consultation and consideration by topic **[APP-021]** ; • J-1: Summary of s42(1)(a), (b) and (d) responses to Phase Two Consultation and consideration by topic **[APP-029]**; • J-2: Summary of s47 responses to Phase Two Consultation and consideration by topic **[APP-029]**; and • K-3 Summary of responses to targeted consultations and consideration by topic **[APP-030]**.
13.3.27	REP1-150	**Information** Query why clear information about construction traffic, noise levels and operational impacts has not been provided as part of the consultation?	As part of Phase Two Consultation, the Applicant published a Preliminary Environmental Information Report (see **Consultation Report Appendices I-1 [EN010158/APP/5.2]** [APP-028]) which set out a preliminary assessment of the potential environmental effects of the Proposed Development and potential mitigation measures. This included assessment of topics including transport and noise and vibration across the construction, operational (including maintenance) and decommissioning phases of the Proposed Development. In addition, the Applicant also published a draft of the **Outline CTMP [EN010158/APP/7.5.3]** for Phase Two Consultation in recognition of local interest in management of construction traffic.
		Decommissioning	
13.3.28	REP1-214, REP1-288	**Reinstatement of land** Comment that there is no guarantee that the land would be kept as agriculture once the Site has been decommissioned and it had been handed back to the landowners.	The Site would be reinstated in accordance with the **Outline DEMP [EN010158/APP/7.4.3]** which has been prepared to support the DCO Application and is secured through Requirement 18 of the **Draft DCO [EN010158/APP/3.1.4]**. Table 3.7: Soil of the **Outline DEMP [EN010158/APP/7.4.3]** notes that the land will be returned back to its prior ALC grade.
13.3.29	REP1-175	**Responsibility** Query who would fund and be responsible for decommissioning the Proposed Development, should the Site owner no longer be in business at that time.	EDF Energy Renewables Limited (trading name EDF power solutions, previously known as EDF Renewables) is the majority shareholder of the Applicant and would take responsibility for decommissioning the Proposed Development in accordance with the **Outline DEMP [EN010158/APP/7.4.3]** should Rosefield EnergyFarm Ltd not be in operation at that time. The financial robustness of EDF Renewables, which is ultimately supported by its parent within the EDF group, is set out in the **Funding Statement [EN010158/APP/4.2]** [APP-017].
13.3.30	REP-147	**Responsibility** Comment that passing on the ridiculously expensive task of recycling vast quantities of solar panels when they reach the end of their life to our children is criminal.	Recycling and disposal of decommissioned materials is highlighted in Section 2.10 of the **Outline DEMP [EN010158/APP/7.4.3]**. This section outlines that the waste hierarchy will be applied and that the "Best Available Treatment Recovery and Recycling Techniques" will be utilised. Any cost implications will not override the commitment to recycling the Proposed Development as far as practicable.
		Land matters	

Ref	WR	Summary Position	Applicant's Response
13.3.31	REP1-214	**Compulsory purchase of land** Comment that the Applicant should provide a clear statement identifying the financial body acquiring the parcels of land and that a full binding requirement is that this cannot be sold on at some future date to either another developer or financial investor, who is not legally linked to the requirement for the cost of restoration and reparations to return the land to its current use in 40 year's time.	The **Funding Statement [EN010158/APP/4.2]** [APP-017] confirms that the Applicant can meet the costs of any compulsory acquisition involved in the delivery of the Proposed Development. It explains how it is expected that the construction of the Proposed Development and the acquisition of the land or rights over the land will be funded, as well as compensation in respect of the exercise of powers of compulsory acquisition. The Applicant confirms that, if consent was granted and Rosefield Solar Farm were sold, the incoming operator would be under the same obligations as the original Applicant because they would be operating under the benefit of the DCO. An operator of a NSIP that is consented under a DCO can only construct and operate that NSIP by having the benefit of the DCO. Accordingly, any new undertaker under the DCO would have to comply with all of the articles and requirements under the DCO. For completeness, the decommissioning requirement in the **Draft DCO [EN010158/APP/3.1.4]**, if the Order is made, must be complied with by any other operator of the solar farm. If consent is granted, a DCO is a piece of secondary legislation, and it is a criminal offence if the Applicant does not comply with the DCO.
13.3.32	REP1-126	**Land negotiations** Comment that the IP has been unfairly affected because his land was included in the Order Limits without his knowledge or consent, harming his reputation locally. Comment that the Applicant contacted his mortgage lender without telling him, causing problems with his lender and forcing him to pay for a revaluation.	The Applicant does not agree that the IP had no knowledge that his land was included within the Order Limits. In November 2023 the Applicant informed Mr Ives' agent that the intention was to include the Interested Party's land in the Order Limits. The land was included within the Order Limits at the time the Applicant carried out its statutory consultation between 18 September 2024 – 5 December 2024 in accordance with sections 42, 47 and 48 of the PA 2008. The Applicant, during the preparation stages, identified the IP's mortgage lender as potentially holding an interest in land. Under section 42(1)(d) of the PA 2008, the Applicant has a statutory duty to consult each person who is within one or more categories in section 44, this includes all parties with an interest in land under section 44(2)(a) and therefore sought details of the interest through a Land Interest Questionnaire.
13.3.33	REP1-126	**Land negotiations** Comment disputing text in the Statement of Reasons stating reasonable efforts were made to negotiate or provide proper information about funding for land acquisition and delivery of the project with the IP. Comment disputing the robustness of negotiations conducted by the Applicant's agents.	Negotiations commenced in November 2023 and are ongoing. The Applicant has been flexible in its approach to negotiations whilst giving consideration to Government Guidance on the provisions of negotiations in the shadow of compulsory acquisition. As stated in the **Land and Rights Negotiations Tracker [EN010158/APP/8.8.2]** at reference 10, the Applicant continues to engage with Mr Ives in order to narrow the commercial matters which are outstanding. The Applicant will continue to engage in an effort to secure voluntary agreement.
13.3.34	REP1-126	**Land negotiations** Comment questioning the accuracy of the Proposed Development's Schedule of Negotiations, saying it does not reflect meaningful engagement with the IP. Comment also highlights that until recently there was little indication the Proposed Development sought permanent acquisition	Negotiations commenced in November 2023. Originally the negotiated settlement sought was on the basis of an access license during construction. As the design of the Proposed Development evolved, it was later determined that access may also be required throughout the duration of the lifetime of the Proposed Development (for example, for maintenance activities should large equipment need replacement). In September 2024, the Interested Party's agent stated that the landowner would prefer the freehold acquisition of plot 7/11 **Land Plans [EN010158/APP/2.2.3]** [REP1-004]. Considering the works required to the land and the permanent requirement for access it was determined that the

Ref	WR	Summary Position	Applicant's Response
		land, yet plot (7/11) now appears in red as land required for compulsory purchase.	compulsory acquisition of plot 7/11 was appropriate and proportionate. As such, the Applicant seeks compulsory acquisition rights over this plot as set out in the **Book of Reference [EN010158/APP/4.3.3].**
13.3.35	REP1-146	**Compulsory acquisition** Comment that compulsory acquisition can have a devastating impact on families and communities.	The primary aim of the Applicant is to avoid the use of compulsory acquisition powers and as set out in the **Land and Rights Negotiations Tracker [EN010158/APP/8.8.2]** negotiations are taking place to avoid the use of powers. The **Statement of Reasons [EN010158/APP/4.1.3]** **[REP1-010]** sets out why there is a compelling case in the public interest for the inclusion of compulsory purchase powers. In its approach to the use of compulsory purchase powers, the Applicant has followed all relevant Government Guidance and through negotiation, or compensation provisions, will minimise the impact on those impacted by the use of CA powers.
		Waste	
13.3.36	REP1-159	**Waste heat** Comment that the Applicant should be required to recycle waste heat energy from the BESS.	The Applicant does not consider waste heat recovery from the BESS to be feasible. The heat produced is low-grade and intermittent, occurring only during charging and discharging cycles, and is not suitable for practical reuse. There is also no viable local heat demand, and transporting low-grade heat over distance would be inefficient and costly. Installing heat-recovery systems would introduce additional energy use, complexity and could interfere with essential battery safety and thermal-management systems. Given the inherently low volume of recoverable heat from modern BESS technology, such measures would not be proportionate or beneficial.
13.3.37	REP1-186	**BESS** Query if the elements of the BESS can be recycled due to their short lifespan.	The Applicant has considered the recycling of the Battery Energy Storage System (BESS) units as set out in section 2.12 of the **Outline OEMP [EN010158/APP/7.3.3]** and in section 2.10 of the **Outline DEMP [EN010158/APP/7.4.3].** At the end of the operation (including maintenance) phase, any above ground infrastructure will be dismantled and removed per industry best practices. The decommissioned materials will follow the waste hierarchy such that they will be reused where possible before recycling and disposal are considered. The type of battery chemistry being used is recyclable. Indicative waste over the project lifecycle can be seen in **ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2]**.
13.3.38	REP1-240	**Recycling** Query if solar panels can be recycled.	The Applicant has secured the recycling of the Solar PV modules as set out in section 2.10 of the **Outline DEMP [EN010158/APP/7.4.3].** Solar PV modules are up to 99% recyclable, and the major components of the panels including the glass, aluminium and copper can all be recovered.
13.3.39	REP1-209	**Waste**	During decommissioning, any material assets and waste will be removed and recycled or disposed of in accordance with good practice and all legislative requirements in force at the time.

Ref	WR	Summary Position	Applicant's Response
		Comment that end-of-life disposal of vast quantities of solar panels will create significant waste and environmental risk.	Solar PV modules are up to 99% recyclable, and the major components of the panels including the glass, aluminium and copper can all be recovered. If items can be recycled, this will be the first choice. The impacts of waste during the decommissioning phase will be managed and mitigated through the use of the waste hierarchy and measures detailed in and secured by the **Outline DEMP [EN010158/APP/7.4.3]** and **Outline Site Waste Management Plan** which forms **Appendix 1** of the **Outline CEMP [EN010158/APP/7.2.3].** A study has been undertaken which assesses the cumulative impacts on waste arising from the Proposed Development and from other local solar schemes at decommissioning. This concludes that under an absolute worst case scenerio, cumulative waste impacts would result in 0.37% of regional landfill capacity. This is presented in **Appendix 1** of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006].** 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 respectively. 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.
		Misc.	
13.3.40	REP1-139, REP1-214, REP1-227	**Procurement** Comment that there are security risks related to the Chinese manufacturing of solar panels.	The Applicant recognises concerns regarding the security of solar PV supply chains, including risks associated with imported components. These risks are addressed through a robust, multi-layered procurement and assurance framework applied by EDF Power Solutions, part of the wider EDF Group (as set out in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3])**. Procurement will be undertaken post-consent and will follow established Group-wide standards developed and tested across a substantial portfolio of solar and battery storage projects. All potential suppliers are subject to rigorous pre-qualification, including assessment of technical capability, cybersecurity, quality, ESG and financial standing. Suppliers must demonstrate transparency of their manufacturing processes, full component traceability and compliance with international standards, with enhanced due diligence applied to key components such as modules, inverters and battery systems. This enhanced approach includes technical validation of components and firmware, assessment of cybersecurity risks (including remote access capabilities), and independent verification through factory inspections where appropriate, aligned with relevant UK and international supply chain security guidance. These requirements are secured through contractual provisions, including audit rights across the supply chain and termination rights in the event of non-compliance. Supplier performance is then continuously monitored throughout the project lifecycle, including manufacturing inspections, pre-installation testing and ongoing operational oversight, ensuring that security risks are actively managed on an ongoing basis.

Ref	WR	Summary Position	Applicant's Response
13.3.41	REP1-193, REP1-211, REP1-213	**Procurement** Comment that the Applicant should demonstrate how panels would be ethically sourced given forced labour issues in the solar PV supply chains.	The Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. As part of the procurement process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy as set out in the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3].** Please also refer to **Ref. 13.3.40** for more information on the procurement process.
13.3.42	REP1-186, REP1-227	**Security** Comment that the Proposed Development would be a target for terrorism.	The safety and security of the personnel and site is a key element of consideration for the Proposed Development. Security risk assessments are carried out at regular intervals within the design, construction, operation (including maintenance) and decommissioning phases of the Proposed Development. This includes taking advice from appropriate intelligence and law enforcement sources as well as using industry best practice to appropriately mitigate the risks. A layered principle of security will be present at site in line with the UK National Protective Security Authority guidance of Deter, Detect, Delay and Respond. The Proposed Development Substation compound would be secured using a metallic or green-coloured palisade security fence or a monitored pulse fence and wire mesh fence. A security cabin would be located at the main gate to the Substation. The Satellite Collector Compounds would be secured using a metallic or green-coloured palisade security fence or a monitored pulse fence and wire mesh fence. Within the BESS and Main Collector Compound areas security and monitoring equipment and a security cabin along with metallic or green-coloured palisade and security fence or monitored pulse fencing would be installed. Within the Solar PV fields deer fencing would be installedformed of wooden and or metal posts and wire mesh up to 2.5m in height. Pole-mounted internal- facing CCTV systemswould be installed at a height up to 5m. During its operating life, the Proposed Development would also be subject to regular inspections and maintenance from operational staff. There are no known instances of large-scale solar or BESS sites in the UK being specifically targeted for terrorism in the UK.
13.3.43	REP1-227	**Security** Comment that local crime will increase due to likelihood of panel/copper thefts.	The safety and security of the personnel and site is a key element of consideration for the Proposed Development. Security risk assessments are carried out at regular intervals within the design, construction, operation (including maintenance) and decommissioning phases of the Proposed Development. This includes taking advice from appropriate intelligence and law enforcement sources as well as using industry best practice to appropriately mitigate the risks. A layered principle of security will be present at site in line with the UK National Protective Security Authority guidance of Deter, Detect, Delay and Respond. Ongoing liaison with the local police forces is part of this response to ensure measures are taken to discourage theft and swiftly detect, respond and apprehend in the event of theft or other criminal action. Fencing, security cameras and intruder detection are implemented as part of the Proposed Development as discussed in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034].**

Ref	WR	Summary Position	Applicant's Response
13.3.44	REP1-120, REP1-186, REP1-263	**Local planning policy** Comment that the Proposed Development does not comply with the Vale of Aylesbury Local Plan (Policies T1, T5, C3, BE1, BE2, NE4 and NE5).	The Applicant has demonstrated compliance with the Vale of Aylesbury Local Plan in Table 1-6 Vale of Aylesbury Local Plan 2013 – 2033 Table of Compliance in Appendix 4 of **Planning Statement [EN010158/APP/5.7.3]** [REP1-016].
13.3.45	REP1-240	**Human rights** Comment that Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8.	The Applicant has had close regard to the relevant provisions in the Human Rights Act 1998 which incorporates the European Convention on Human Rights (the **Convention**) into UK Law. As set out in Section 7 of the Applicant's **Statement of Reasons [EN010158/APP/4.1.3]** [REP1-010] the Applicant has considered and addressed the human rights implications of the compulsory acquisition powers it seeks. An infringement of human rights protected by the Convention is authorised by law so long as: (a) the statutory procedures for making the Order are followed and there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition in the Order; and (b) the interference with the Convention right is proportionate. The Applicant is aware of the case of Britton v SoS for the Environment [1997] JPL 617 which requires that any interference with private life must be necessary, lawful and proportionate. The Applicant acknowledges the relevance of the case to interpreting Article 8 (respect for private and family life) of the Human Rights Act 1998. However, the Order Land does not include, and the Proposed Development does not require, the acquisition of any residential dwelling-houses. Consequently, as dwelling-houses will not be directly affected, it is not anticipated that the Convention rights protected by Article 8 will be infringed.
13.3.46	REP1-120, REP1-196, REP1-263	**National planning policy** Comment that the Proposed Development does not comply with the NPPF (paragraphs 57, 58 174, 180 and 185 and Section 16).	The Applicant has demonstrated compliance with the NPPF in Table 1-4 NPPF (NPPF, 2024) Table of Compliance in Appendix 4 of **Planning Statement [EN010158/APP/5.7.3]** [REP1-016].
13.3.47	REP1-120	**National planning policy** Comment that the Proposed Development does not comply with Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.	Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** assesses a total of 42 designated heritage assets (including the Grade I Claydon House, Grade II Claydon Registered Park and Garden and Grade II* Church of St Mary and Botolph House) and three non-designated heritage assets (the medieval field systems and two buildings associated with the registered park and garden of Claydon) and concludes that they would experience less than substantial harm within the lower end of the scale. These effects are concluded to be not significant. The assessment concludes that with embedded and additional mitigation in place, there are no other significant adverse impacts anticipated and, as such, the SoS's decision to grant the DCO Application would be compliant with Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990. For example, the reduction in number of Solar PV modules proposed around Knowl Hill (Fields B17 and B9), which is secured through the **Works Plans [EN010158/APP/2.3.3]** [REP1-005]**.** Other forms of embedded and additional mitigation measures are documented within the: **Design Commitments [EN010158/APP/5.9.4]**, **Outline**

Ref	WR	Summary Position	Applicant's Response
			LEMP [EN010158/APP/7.6.3], **Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094]** and **Outline CTMP [EN010158/APP/7.5.3]** and are secured via corresponding requirements of the **Draft DCO [EN010158/APP/3.1.4]**.
13.3.48	REP-193, REP1-213	**Glint and glare** Comment that the Proposed Development could have glint and glare effects on roads, homes and aviation receptors.	The potential glint and glare effects on sensitive nearby receptors including roads, homes and aviation receptors have been assessed in the **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082].** The technical analyses have found no significant adverse effects on nearby sensitive receptors, including aviation flying paths, railway lines, roads and buildings.
13.3.49	REP1-263	**Glint and glare** Comment that glint and glare effects have not been adequately assessed for nearby homes and roads.	The maximum extent of Solar PV modules proposed as part of the Proposed Development as detailed in the **Works Plans [EN010158/APP/2.3.3] [REP1-005]** have been included in **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082]**. The assessment has studied potential glint and glare effects to nearby building and road receptors, located within a 1km study area from these reflective modules, have been considered. For buildings, the approach was to consider all habitable buildings that show a potential view of the Solar PV modules. Where there is a cluster of buildings, only a selection of them with the highest potential to be affected by glint and glare are assessed as representative of the rest, as the impacts will be similar. Local roads with very low traffic are excluded from the analyses, as the potential glint and glare impacts are considered to be very low and not significant. The analyses have found no significant adverse effects on nearby roads or buildings.
13.3.50	REP1-170	**Relevant Representations** Comment that the IP did not have their Relevant Representation published by PINS and therefore has not received a response from the Applicant.	The Applicant notes this. However, the Applicant has had regard for the IP's two WRs, and any further submissions they should wish to make.
13.3.51	REP1-225	**CCTV** Comment that the Applicant has not provided reassurance that cameras cannot capture neighbouring land or PRoW.	Within the **Design Commitments [EN010158/APP/5.9.4]**, design commitment D5 states "CCTV will be deployed at regular intervals to provide a sufficient field of view within the boundaries of each field, typically one spaced every 50-60 metres". Design commitment F2 states "CCTV will be mounted on wooden poles and would not be positioned to face any residential properties and would have fixed views into the Order Limits as a security measure".

Appendix 1
Response to the Written Representation received from TCS Biosciences Ltd and Preston Farms

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1. Introduction

1.1. Purpose of the Note

1.1.1. This document has been prepared on behalf of Rosefield Energy Farm Limited (the Applicant) in order to provide a single source of responses to the matters and issues raised by Preston Farms Ltd and TCS Biosciences Ltd (collectively known as Preston Farms) through their Written Representation submitted at Deadline 1, which is taken to be a detailed summary of issues raised through consultation feedback and previous representations.

1.1.2. This document sets out the Applicant's current understanding of the Preston Farms operation, the potential impact of the Proposed Development on Preston Farms, and steps taken to mitigate them. The steps taken to mitigate them include the iterative design approach throughout pre-application engagement and consultation, the development of management plans, and subsequent refinement of plans following further post-submission engagement with Preston Farms Ltd and TCS Biosciences Ltd.

1.1.3. A Statement of Common Ground will be submitted reflecting the updated status of all items under discussion at Deadline 3, to help inform the Examining Authority of progress being made on individual issues.

1.1.4. This Note is structured as follows:

- Consideration of **noise and vibration** effects:
  - during construction (noting the background noise and noise sources today i.e. agricultural machinery and road traffic noise); and
  - during the operational (including maintenance) phase;
- Mitigation for **noise** effects provided through:
  - embedded measures and design;
  - additional mitigation (construction); and
  - additional mitigation (operation);
- Consideration of **traffic and access** effects and mitigation steps:
  - during construction; and
  - during operation.
- **Fire risk** and plume assessment;
- **Biosecurity;**

- Provision of **Replacement Land**;
- **Design** measures; and
- Other **additional and embedded provisions**, including commitments to engagement and adaptive management and co-existence.

2. Background

2.1.1. At the early stages of engagement with Preston Farms the Applicant signed a Non-Disclosure Agreement in recognition of some of the sensitivities around the business. The Applicant has always been aware of the sensitivities and has sought to amend the Proposed Development or put in place steps for mitigation in order to reduce any impact.

2.1.2. The Applicant recognises that Preston Farms is not a typical agricultural holding. The Applicant also recognises that the livestock (horses and sheep) the business relies upon are sensitive to changes in the environment and in particular factors such as noise and biosecurity play an important role.

2.1.3. By offering replacement land for land used by Preston Farms which will become operational land, the Claydon Estate in partnership with the Applicant has gone well above the compulsory acquisition and legislative minimums and the Applicant remains committed to an open dialogue and working collaboratively with Preston Farms to reach solutions that mitigate impacts on their operations as far as practicable.

2.1.4. Preston Farms set out details of the business in paragraphs 16 – 26 of their **Written Representation** **[REP1-133]**. In summary the blood (agar plates) must be robust and consistent and therefore the donor animals must be stress free. The blood must also be free from contamination (paras 24-26 of the Written Representation). Preston Farms explain that the animals graze in the fields in the summer and are housed indoors during the winter months (para 32). The Applicant would welcome further details from Preston Farms as to the typical months where animals are either indoors or grazing outside and the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point.

2.1.5. Preston Farms confirm that all animal feed comes from the holding (para 36). In discussions with the Applicant, Preston Farms have confirmed the farm operates on the basis of rotating grazing land and arable fields but with some fields permanently arable. The Applicant would welcome more information from Preston Farms as to the acreage split between grazing and arable in a season and further details of the rotation process. Again the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point. It is recognised that animal movements are controlled and the holding land is contiguous.

3. Noise

3.1. Preston Farms Written Representation

3.1.1. At various stages through the written representation Preston Farms raise issues regarding the impact and assessment of noise in relation to livestock during construction and operation.

3.2. Applicant's Review

3.2.1. The Applicant has prepared a **Noise and Vibration Technical Note** as set out at **Annex 1** to this Appendix which considers the impact of noise on horses and livestock (sheep) in paragraphs 2.1 and 2.2.

3.2.2. The **Noise and Vibration Technical Note**, which draws on a number of research papers and studies, establishes that (in respect of horses) sudden noise can be disturbing, with temperament and experience also influencing the level of distress.

3.2.3. The Applicant is not aware of technical data being available in respect of noise levels that cause distress to horses. As per paragraph 2.2.2 of the **Noise and Vibration Technical Note**, the British Horse Society (BHS) recommends that a useful guide to whether a horse will be troubled by noise is considering how similar a noise may be to a natural predator as well as previous exposure to common mechanical noises.

3.2.4. Whilst it is recognised that noise and vibration can have an impact on horses and sheep, the measures put in place during operation will mitigate any real or perceived impact. The Applicant has committed in the **Outline Operational Environmental Management Plan [EN10158/APP/7.3.3**] to monitor noise and vibration impact during the operation period.

3.2.5. During construction and decommissioning, the potential for noise and vibration impacts is acknowledged to be greater than operation - however the Applicant has put in place mitigation measures to limit potential impacts and is committed to working with Preston farms to ensure the Proposed Development and Preston Farms can coexist.

3.2.6. The Applicant has considered existing noise levels at land occupied by Preston Farms and, as set out in **ES Volume 3, Figure 13.2: Baseline Survey Locations [EN010158/APP/6.3] [APP-072]**, current db levels are around 32 db at Sion Hill Farm. Existing noise emitters include:

- Local traffic;
- Farm machinery; and
- Overhead Lines.

3.3. During Construction

3.3.1. As set out by Preston Farms the horses and sheep are housed inside during the winter and are outside grazing during the summer. Whilst the Applicant appreciates it is weather-dependent, it would welcome further details of the typical months of the year the two rotations take place and the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point.. The potential for impact will vary depending on the location of the animals and therefore contingent on the time of year works take place.

3.3.2. As set out at paragraph 2.2.5 of the **Noise and Vibration Technical Note**, the BHS set out a series of steps to manage construction noise impacts on horses including:

- *All members of the construction and operational work force and visitors should be made aware of the equestrian routes or areas used by horses which may be affected by the proposed development.*
- *If a banksman is employed to control vehicle movements and activities, they should be fully briefed about the possibility of horses being in the area and the necessary actions to be taken for the safety of horse and rider or driver and others in the vicinity.*
- *Warning notices should be displayed in advance of reaching the site describing the hazards for both equestrians and the construction site workers or visitors and requesting the co-operation of all.*
- *Operators must be able to shut off machinery or to stop movement and noise while horses pass and avoid starting up a machine or initiating movement while horses are in range.*
- *Machinery or activity should not resume until horses are at least twenty metres past. If it is not possible for activity to be halted, staff should be at the location to warn approaching equestrians as appropriate. Such 'sentries' should be obvious on approach, not hidden behind a tree or equipment as suddenly appearing could be an additional stress factor causing a horse to react.*
- *If a horse appears distressed—freezes, jerks sideways, prances about, takes flight, spins round or shies away or acts in any way other than a calm forward motion—or an equestrian appears to be struggling for control, or shouts, all movement and noise should cease immediately to avoid escalating the situation. Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or more than fifty metres away.*

3.3.3. This is a helpful guide, however, as set out in Section 3 of the **Noise and Vibration Technical Note** the Applicant has gone further than the BHS recommended steps with temporary noise barriers, less intrusive piling

methods, construction traffic management and access routes, best practicable means commitments and Toolbox talks all being committed through the the **Outline Construction Environmental Management Plan [EN010158/APP/7.2.3] [REP1-078]**, .

3.3.4. Critically, the Applicant, through the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.3] [REP1-078]**, has committed to work with Preston Farms to put in place measures so as to limit negative potential impacts on horses and sheep whether the animals are outside grazing or in stables.

3.3.5. As acknowledged in the Sharps Acoustics document [REP1-133], there are no reliable studies which enable an adverse effect to be linked to a measured level or metric. Given the uncertainty in terms of relevant criteria to be applied for horses and Sheep in terms of threshold values, metrics and weighting corrections, communication with Preston Farms throughout the works is considered to be the most appropriate solution to minimise potential impacts on their livestock (as recommended by Sharps Acoustics).

3.3.6. This liaison is embedded within the assumptions made in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040], where the following commitment was made within the Community Liaison section:

"Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. This typically serves to understand concerns from local residents and enable them to be addressed where feasible, thereby reducing the likelihood of complaints. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works." hAs part of Deadline 1, the Outline Construction Environmental Management Plan [EN010158/APP/7.2.2] [REP1-078], and Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4.2] [REP1-082] was updated to include the following commitment in respect of this within Section 2.9 (Control of Noise):

"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 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." tIn addition, the following statement is included with Section 2.10 of the Outline CEMP [EN010158/APP/7.2.2] [REP1-078]:

"*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.*"

3.3.7. The specific mitigation measures that are implemented will depend on the timing of the works and the location of the livestock at that time.

3.3.8. As set out in the **Noise and Vibration Technical Note (Table 3.1)** the most severe, unmitigated, noise impacts are at 25m – 50m away from construction works. Whilst mitigation measures will reduce the noise levels set out in the Table 3.1 the Applicant is also committed to working closely with Preston Farms to establish ways in which horses and livestock can be located away from any construction noise if it is an issue. For example, could the fields closest to construction areas be used for crop rather than grazing for a season.

3.3.9. The Applicant would also be able to consider the temporary use of other areas of land within the Order Limits by Preston Farms during construction. This, and other temporary measures, will require Preston Farms and the Applicant to work together which the Applicant is committed to doing through the **Outline CEMP [EN010158/APP/7.2.3] [REP1-078].**

Piling / Vibration:

3.3.10. Piling works for the PV frames will be a highly transient activity, with each pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s PPV criterion at the surrounding residential receptors as a result of the PV piling works.

3.3.11. It is acknowledged that the assessment primarily considers residential receptors, however the Applicant is not aware of vibration thresholds which indicate the onset of adverse effects in horses and sheep. Therefore, as part of the consultation with the landowner, if ground-borne vibration is shown to adversely affect horses and sheep in adjacent fields, alternative rotary bored piling techniques could be adopted. Potential disturbance to horses and sheep would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced such as those set out above or for example temporary noise fencing, to reduce the construction induced noise and vibration levels, where appropriate. This is captured within the Outline CEMP [EN010158/APP/7.2.2] [REP1-078]:

3.4. During Operation

3.4.1. The Applicant has committed to substantial noise mitigation (and monitoring, linked to remedial action) within the **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.2] [REP1-080].** Within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040**], Section 13.7 sets out the measures that have been 'embedded' into the design of the Proposed Development to avoid or reduce potential significant effects as far as practicable.

3.4.2. The mitigation measures proposed are:

- Adoption of low-noise equipment;
- Maximising separation distances as far as practicable;
- Orientating equipment away from sensitive receptors, where emissions were directional; and
- Strategic placing of noise barriers.

3.4.3. As set out in the para 3.3.6 of the Noise and Vibration Technical Note which refers to **ES Volume 3, Figure 13.4: Operational Phase Noise Contours (with additional mitigation) [EN010158/APP/6.3] [APP-072]** the levels of noise during operation, on a worst-case scenario, with the committed noise mitigation measures in place, are set to be 40db-45db 100m into the Preston Farm fields adjacent to the BESS and 35-40db in the next contour extending to approximately 500m before falling back to 25-35db, the same as current levels, for the rest of the Preston Farms holding. To give some guidance noise from cars on local roads, some of which run adjacent to Preston Farms holdings, would typically be 55db-60db at 10m distance. and the current site is also likely to be impacted by noise from agricultural machinery and noise from Overhead Power lines, particularly during wet weather.

3.4.4. The Applicant has committed to best practice measures, as detailed in and secured by the **Outline OEMP [EN010158/APP/7.3.3]**, and the adopted criteria of 40dB LAr daytime and 35dB LAr night-time at high sensitivity receptors, which is secured by Requirement 14 in Schedule 2 of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3] [REP1-008].**

3.4.5. In conclusion, the Applicant has put in place mitigation measures to ensure any increase in noise, on a worst-case scenario, would be minimal and only in those areas closest to the noise emitters.

3.4.6. Any noise would be consistent (i.e not startling noises) and there is a commitment to monitor noise. Considering all of these factors the Applicant does not believe there is an evidence base to suggest operational noise of the Proposed Development will impact on the operations of Preston Farms.

4. Traffic and Access

4.1. Preston Farms Written Representation

4.1.1. In summary Preston Farms make representations that:

- *Access to Site 3 from Granborough Road through plot 6/12 should be removed due to the potential impact on the farming operation and alternatives such as Winslow Road should be considered;*
- *Access over plots 6/10 and 6/12 should be limited to cable route access only; and*
- *There should be no access, other than for cables, across E23.*

4.1.2. Preston Farms do not distinguish, in their written representation, between construction access, which will be temporary in nature, and operational access, which will exist for the term of the operation. The Applicant would find it useful if Preston Farms could provide further details of when, how, and how often, animal movements take place, particularly over plot 6/12, which the Applicant has raised with them verbally.

4.2. Access during Construction

4.2.1. The Applicant has confirmed in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** that access over Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** is only for the construction of the connection cables.

4.2.2. No general construction traffic will pass over Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**]) instead construction traffic will pass along Claydon Road and Granborough Road before entering into parcel 3 via Fields SA47-50 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]**).

4.2.3. Once construction traffic has arrived to Site via designated routes, the Applicant has committed to limiting construction traffic to within the Order Limits without sending construction traffic through surrounding roads and villages which would create unacceptable transport effects on surrounding roads and villages. It would also add to cumulative effects of construction traffic and create the need for additional land take for road widening works. There are only two areas where parcel 3 adjoins the highway being either Granborough Road or Winslow Road.

4.2.4. If access was taken from Winslow Road this would create significant construction traffic moving around the surrounding villages.

4.2.5. The Applicant is confident the access over Fields SA47-50 (within plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** represents the most appropriate proposal in respect of the wider area, balancing the different environmental constraints.

4.2.6. As set out in **Appendix 1** to the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, the indicative access across Field SA46 (plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** was moved from the field boundary to instead follow the route of the existing overhead infrastructure, to reduce the impact on retained land, follow existing infrastructure and assist with the movement of livestock.

4.2.7. Furthermore, the access was located close to the existing silage clamps which the Applicant understands are accessed by vehicles on a regular basis. This change was made following discussions with Preston Farms during an, in person, meeting held in October 2024.

4.2.8. The Applicant is seeking the ability to reserve the right to locate the internal access track anywhere within Fields SA47-50 (Plot 6/12 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** and the Applicant would be willing to work with Preston Farms to agree the most appropriate location, where the impact can be limited, within Fields SA47-50 plot 6/12.

4.2.9. Furthermore the **Outline CEMP [EN010158/APP/7.2.3]** contains measures to mitigate effects of the internal access track into Parcel 3 during the construction phase, including but not limited to low speed limits, advance notice of activities and biosecurity measures.

4.2.10. Access into Parcel 3 is proposed from Granborough Road as this is the most appropriate and efficient form of access to this area. This ensures that construction traffic does not pass through villages and settlements on the local road network leading from the A41. The access strategy on the public road allows for other road users to continue to access the length of Granborough Road and includes passing places to benefit all road users. Winslow Road is the only alternative access point into Parcel 3 from the local road network. There are no other locations where Parcel 3 abuts the highway.

4.2.11. The **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.3]** provides specific provisions for Preston Farms, as discussed with Buckinghamshire Council and includes measures to enable the safe movement of horses and sheep over the public road, a feature not currently available. Measures to ensure the safe movement of horses and sheep over internal access tracks are also provided. The locations of crossing facilities on internal access track will be discussed with Preston Farms and measures such as boundary treatments, fencing types, gates,

etc will be discussed and agreed. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.3]** all contain measures to mitigate effects of the internal access track into Parcel 3, including but not limited to low speed limits, advance notice of activities and biosecurity measures.

4.3. Access during Operation

4.3.1. The Applicant has confirmd in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]** there is no proposed access route across Fields SA35-45 (plot 6/10 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004]** between Site 2 and Site 3 during the operational (including maintenance) phase of the Proposed Development, instead using Quainton Road and Granborough Road Access to Fields SA35-45 (plot 6/10). This traffic will be limited to ad hoc, infrequent access for any necessary cabling maintenance works.

4.3.2. As set out further in this Appendix, Field E23 forms part of the Proposed Development by providing Solar PV development as well as operational access to the project substation in Fields E11 (plot 7/9) **Land Plans [EN010158/APP/2.2.3] [REP1-004]**. As the land is required for the Proposed Development, and access to the project sub station it would not be possible to limit use to cable access only.

4.3.3. The operational access from Granbrough Road proposed by the Applicant represents the most viable operation access to parcel 3. The Applicant has considered access from Winslow Road for operational use but this would require significant highways works to create an appropriate visibility splay (due to the location of the access on a bend). Such works would require the acquisition of additional land and the removal of trees and hedgerows. The Applicant is confident that the access from Granbrough Road, which would involve only a few vehicles movements a day, can be managed, with mitigation measures in place such as slow speeds; biosecurity; restrictions on vehicle movement and; appropriate boundary treatment, in such a way so as not to impact the operation of Preston Farms.

5. Security and Biosecurity

5.1. Points raised by Preston Farms via Written Representation

5.1.1. Preston Farms raise several points and examples relating to biosecurity in respect of the importance of its ongoing operations for TCS Biosciences Ltd, noting that (in summary):

- *Biosecurity is a broad and key business risk*
- *Biosecurity and anti-contamination measures are deployed throughout the operation*

5.1.2. Concerns relate specifically to:

- Animal movements within a contiguous site - *The animals move and graze as herds across the Holding in the summer months, through carefully controlled movements, and live in specialist indoor and yard facilities during colder months.*
- Contact with vehicles and humans and unauthorised personnel - *Contact with humans and other fauna is strictly controlled, including through control of access generally… Given the number of personnel and vehicles involved, the associated level of activity would be extremely difficult to reconcile with the security and biosecurity controls currently in place - One of the principal biosecurity controls for plots 6/10 and 6/12 is that no unauthorised personnel currently enter these areas*
- Sourcing of animal feed - *All of the animals' feed comes from the Holding (so their winter feed as well as grazing), which keeps contamination/biosecurity risk to a minimum*

5.2. Applicant's Mitigation Measures

5.2.1. **The Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** were updated at Deadline 1 to include management measures specifically in response to concerns raised about biosecurity and the impacts on the Prestons' businesses.

5.2.2. These include measures as follows:

- The Applicant will liaise with Preston Farms during the preparation of the detailed Construction Environmental Management Plan(s) and subsequently during the construction phase. Measures to be included in the detailed Construction Environmental Management Plan(s) will include:

- providing advance notification of the location and timing of any construction, maintenance or decommissioning activities in proximity to the Prestons' grazing land;
- appropriate biosecurity measures reflective of the Preston Farms own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and
- provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above.

5.2.3. Detailed biosecurity measures for the detailed Construction Environmental Management Plans and Operational Environmental Management Plans will be developed in consultation with Preston Farms based on best practice.

5.2.4. The replacement land agreed with Preston Farms is contiguous with Preston Farms existing holding ensuring animal movement can be maintained in a secure environment.

5.2.5. During operation the use of parcel 3, and its access over plot 6/12 will be low. As set out above the Applicant will put in place measures to ensure no interactions between site operators and horse and/or sheep do not occur. Access during construction will be more frequent and in a similar way to noise impacts the Applicant will work with Preston Farms mitigate any potential biosecurity issues. Such measures might include temporary additional land or rotation grazing plans during construction.

5.2.6. In conclusion the Applicant has committed to steps to mitigate any potential biosecurity issues and with such measures in place believes any risk can be managed.

5.2.7. The Applicant is also committed to working with Preston Farms to agree site specific measures that can be undertaken.

6. Design

6.1. Points raised by Preston Farms via Written Representation

6.1.1. Preston Farms raise particular concerns regarding the use of field E23 (Plot 6/13 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** for solar PV development. They state at paras 61-65:

Field E23 forms an important part of the coordinated movement and rotation system necessary to maintain efficient operation of the farm. The loss of this field alters the functionality of the holding as an integrated system. Rather than removing the field, the Applicant has proposed livestock corridors through solar panels, however, this is not a workable solution as horses are accustomed to open grazing conditions.

6.1.2. Specific details of how Field E23 (Plot 6/13 as shown on the **Land Plans [EN010158/APP/2.2.3] [REP1-004])** is utilised for movement and rotation has not been set out by Preston Farms the Applicant would welcome more details from Preston Farms in this respect and the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point..

6.1.3. Evidence suggests field E23 has been set out as arable land over the last 5 years. The Applicant has been verbally informed by Preston Farms current access points around Field E23 are from all directions but it is not clear if all access points are used for animal movement and machinery and/or both. More details on the use of E23 and access points to E23 from Preston Farms would be welcome

6.2. Applicant's Response

6.2.1. Throughout the design process of the Proposed Development the Applicant has responded to feedback from Preston Farms, to help avoid, reduce and/or minimise the potential effects perceived by these businesses.

6.2.2. As set out in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, some of the amendments to the design to reduce impacts, based on this feedback, include the removal of the Rosefield Substation from Field E23 (now only proposed for Solar PV development) to reduce noise, and incorporating suitable livestock movement corridors through the Solar PV development fields for Preston Farms livestock to access surrounding adjacent grazing fields.

6.2.3. It is not the Applicant's intention to remove Solar PV development from Field E23 which is required to ensure the Proposed Development makes

efficient use of land and delivers the maximum CNP infrastructure benefit. Parcel 3, of which Field E23 forms part, is located close to the existing National Grid East Claydon Substation, the proposed National Grid East Claydon Substation extension and the consented East Claydon BESS. The Applicant considers Field E23 is an appropriate location for solar PV development.

6.2.4. The Applicant accepts that Field E23 will not form 'open grazing' but in recognition of the requirement to move animals around the wider holding the Applicant has committed to providing livestock corridors.

6.2.5. At Deadline 1, the Applicant amended design commitment G2 within the **Design Commitments [EN010158/APP/5.9.4]** to specifically require the design and routing of corridors through the Solar PV development in Field E23 to be undertaken in consultation with Preston Farms. The Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point.

6.2.6. At Deadline 2, a further update has been made to the **Design Commitments [EN010158/APP/5.9.4]** to secure a minimum width of 20m for the corridor. The Applicant is willing to site the corridor in a location that supports Preston Farms use of the land adjacent land.

6.2.7. The thorough design development process, including the evolution of Parcel 3, is detailed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]** and **Design Approach Document [EN010158/APP/5.8] [REP1-018].** The impact of BESS in parcel 3 on the Preston Farms, alongside flood risk, Sion Hill Farm and the overhead lines, was a key factor in the BESS being located in Parcel 2.

6.2.8. Preston Farms raise concerns regarding the livestock corridors through the Solar PV development. The Applicant is not aware of any evidence, and none has been provided, that horses are impacted by the presence of solar PV modules however the Applicant has committed to wide (20m) corridors and the boundary treatment can be adjusted to mitigate any perceived impact.

6.2.9. The British Horse Society's 2025 *'Advice on solar farms near routes used by equestrians'*, whilst not tailored to the specifics of Preston Farms, identifies that care should be taken in solar farm design not to create narrow corridors through solar farms, as tall fencing along the corridors could be intimidating and narrow corridors could create confinement with no 'escape space'. The British Horse Society recommends a minimum useable width of 4m between fences, which they indicate means that fence lines should be a minimum of 5m apart. Consequently, a 20m corridor is four times the width of the minimum recommended by the

British Horse Society and provides a substantial corridor for the passage of horses.

6.2.10. The same British Horse Society guidance identifies that glint and glare from Solar PV development has been a concern for horse riders. The guidance states that the British Horse Society has "no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses" having considered sites with both solar panels and horses. The guidance goes on to state "Horses may react to a new solar structure as they might to anything different in their environment, but will quickly accept it (when introduced appropriately). Such reaction is simply to a change in their surroundings, it is not likely to be a response to reflection because their handlers report no reflection from panels. Although horses' vision is different from humans, their response does not suggest that they see panels differently."

6.2.11. The Applicant considers that the proposed mitigation measures will allow the continued movement of livestock through Field E23 to the remainder of the Preston Farms holding whilst allowing the site to be used for Solar PV development and the presence of solar in E23 will not impact on Preston Farms use of adjoining land.

7. Fire Risk – PLUME

7.1. Points raised by Preston Farms via Written Representation

7.1.1. Preston Farms raise concerns in relation to the proposed BESS infrastructure in Parcel 2 with respect to fire risk, emergency response, insurance implications and wider business continuity.

7.2. Applicant's Assessment and Approach to Mitigation

7.2.1. The risk of fire is very low - a Layer of Protection Analysis has been carried out (within the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**) which confirms that the risk of a thermal runaway event has been determined to be very small, with a risk of occurring with a probability of approximately 1 in 5804 years.

7.2.2. The risk of air quality effects relating to atmospheric dispersion in the event of a BESS incident is also very low. The Applicant can confirm that a preliminary air quality assessment including atmospheric dispersion modelling has been undertaken and was submitted at Deadline 1. The scope of this study is based on UKHSA recommendations (emissions and air quality impacts), through ongoing discussions and NFCC guidance (sensitive receptors within 1km radius).

7.2.3. The assessment has been undertaken to be deliberately conservative to account for an extreme worst-case scenario. The results of this assessment show no exceedances of any Acute Exposure Guidelines Levels (AEGLs) and Air Quality Standards (AQSs) at any receptor due to a BESS incident.

7.2.4. When considering that a BESS incident is understood to be an extremely low probability and the potential for effects that create notable discomfort to humans (i.e. at AEGL 1 level) are not predicted using a conservative methodology, the risk of significant health effects to the surrounding land uses is judged to be very low.

7.2.5. Given a potential BESS fire would also be a relatively short-term incident, it is considered appropriate to compare predicted concentrations against AEGLs, which have higher threshold concentrations than the national air quality objectives and are relevant to short term releases. AEGLs are expressed as concentrations of a substance above which it is predicted that the general population of humans could experience, including susceptible individuals and there by implication can also be assumed for horses or livestock, noting the Applicant is not aware of any evidence and none has been presented to suggest otherwise:

- Level 1 - Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure;
- Level 2 - Irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape; and
- Level 3 - Life-threatening health effects or death.

7.2.6. The closest receptor to the BESS (proposed to be located in Fields D8/D9) is Borshaw Farm 400m to the south (outside of the Order Limits), where the effects are judged to be very low within the **BESS Plume Assessment Summary [EN010158/APP/7.13.2] [REP1-098]**.. Worst case Hydrogen Fluoride (HF) emission levels at 400 metres (Borshaw Farm) have been modelled at only 10.5% (0.1 PPM) of the AEGL Level 1 threshold (1 PPM). The Environment Agency has derived and published benchmarked values known as Environmental Assessment Levels (EALs) for airborne pollutants commonly released by industrial sources. EALs represent a pollutant concentration in ambient air at which “no significant risks to public health are expected”, the EAL for HF is 0.2 PPM.

7.2.7. The Applicant has investigated emission levels in the field closest to the BESS where horses from Preston Farms could be located. HF emission levels within the fields are below the AEGL Level 1 threshold and are below the EAL threshold at 55m (173ug/m3 / 0.2 PPM) from the worst-case BESS fire position (approx. 35m from the field line boundary adjacent to the BESS). The levels reported within these fields are below the EAL and AEGL limits, which are set considering all human health receptors including people with severe respiratory issues or vulnerable babies. This is considered to pose no significant risk to human receptors and no evidence has been presented to suggest these levels would pose a significant risk to horses.

7.2.8. The probability of fire emissions impacting the location is also very low because horses are not located downwind of the prevailing wind direction from the BESS site. It is also expected that should a BESS fire occur then horses would move away from the northern end of the field, away from the fire. Emission levels at the far sides of the field are lower, less than 0.1 PPM.

7.2.9. The UKHSA - the Statutory Consultee for the Proposed Development relating to public health effects - has declared in the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** that the Applicant’s BESS fire emission risk analysis and consequence modelling: “*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public*

health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low".

7.2.10. The Applicant has also engaged with Buckinghamshire Fire Authority throughout the pre-application phase to ensure that all Fire & Rescue Service emergency response requirements for the Proposed Development are fulfilled. Outcomes of this engagement are detailed in the Statement of Common Ground - Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.17.2].

8. Land Swap

8.1. Preston Farms Written Representation

8.1.1. Preston Farms acknowledge that compensation/replacement land has been provided, but comment that the land is over to one side and therefore would fragment the holding. They also comment that the replacement land would also take time and considerable expense to be brought to standard.

8.2. Applicants Response

8.2.1. The Applicant must comply with the statutory tests for compulsory acquisition, and considers it has satisfied these tests as set out in section 122 of the Planning Act 2008. Thorough its **Land and Rights Negotiations Tracker [EN010158/APP/8.8] [REP1-108]** and **Status of Negotiations with Statutory Undertakers [EN10158/APP/8.9] [REP1-109],** the Applicant has demonstrated that the land (including land within which Preston Farms has an interest) is required for the Proposed Development, or is necessary to facilitate the development or is incidental to it.

8.2.2. The Claydon Estate has negotiated with Preston Farms to agree Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to Preston Farms via their existing holding. Such replacement land seeks to ensure Preston Farms business is not adversely affected. The steps taken by the Claydon Estate, in offering replacement land, far exceed the provisions of compensation under the Agricultural Holdings Act 1986.

8.2.3. The terms of the agreed Heads of Terms are confidential to the parties subject to the agreement. As shown by the plan (Map B) provided by Preston Farms in their Written Representation the replacement land is contiguous to the Preston Farms existing holding and therefore provides for an extension to the existing holding. Preston Farms were involved in the identification of the replacement land, the location of which is defined and agreed in the Heads of Terms which were signed in September 2025. The replacement land area is 136.15 acres which is slightly larger than the land occupied by Preston Farms that is required for the Proposed Development which is 135 acres.

8.2.4. The majority of the replacement land is currently in arable use with some areas of grazing. The Applicant is not aware of the intended use of the land by Preston Farms. If Preston Farms intend to use the land for a similar use then works required will be limited, however, if the land is to be put to grazing then it is correct that alterations will be required being

mainly fencing and seeding. The parties, including the Applicant, are prepared to work towards a solution to ensure the land is suitable, whilst reflecting the commercial terms of the agreement and will continue to work with Preston Farms to resolve this matter.

8.2.5. The Applicant considers that the terms agreed for the replacement land secure the future of Preston Farms in this location. Whilst it is acknowledged the replacement land is in a different location. it is contiguous to the existing holding and of a similar size. Once the intended use of the land is established then it will be easier to understand what, if any, alterations are required. The Applicant anticipates any alterations such as boundary fences and grass planting will be straightforward to implement and the Applicant does not understand there are any unresolvable barriers to the use of the land by Preston Farms.

9. Conclusion

9.1.1. Preston Farms have raised a number of concerns in their written representation which can be categorised as concerns over noise and vibration, access, biosecurity, fire risk and replacement land.

9.1.2. The Applicant has and continues to acknowledge the sensitive nature of Preston Farms operation and has put in place mitigation measures to reduce any perceived impact, whilst ensuring the delivery of a Nationally Significant Infrastructure Project.

9.1.3. The Applicant's assessment of the effect of the Proposed Development on Preston Farms is that it would be not significant, and various mitigation measures have been proposed and are captured within the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107, the Applicants updated Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] submitted at Deadline 1. This also includes a commitment that the Applicant will liaise with Preston Farms and during the preparation of the detailed Construction Environmental Management Plan(s) and subsequently during the construction phase. The Applicant also 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.

9.1.4. In developing the Proposed Development, the Applicant has taken feedback from Preston Farms and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects.

9.1.5. Engagement with Preston Farms is ongoing to seek agreement to the approach to managing the effects of the Proposed Development. Considering all of the above the Applicant is confident that, with the measures put in place, the Proposed Development and Preston Farms can coexist.

Annex A – Noise and Vibration Technical Note

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1. Introduction

1.1. Purpose of the Technical Note

1.1.1. This Noise and Vibration Technical Note has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to provide further information regarding the effects of noise and vibration on horses, sheep and cattle in relation to the Development Consent Order (DCO) Application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development') in response to the Written Representation received from Preston Farms Limited and TCS Biosciences Ltd **[REP1-133]**.

1.1.2. Horses, sheep and cattle have not specifically been assessed as a receptor in the noise assessment detailed in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, however, the following commitment was made within the Community Liaison section of the chapter:

"Community liaison and communication throughout the construction phase would be undertaken to provide information to people residing in properties located in the vicinity of the Order Limits. This typically serves to understand concerns from local residents and enable them to be addressed where feasible, thereby reducing the likelihood of complaints. The community liaison would extend to landowners with livestock or other animals that may be present in fields adjacent to the construction works."

1.1.3. This document presents a summary of available research and guidance on the impacts of noise and vibration on horses and sheep and sets out the mitigation measures proposed to avoid or reduce adverse effects.

1.2. The Order Limits

1.2.1. The extent of the Order Limits are shown in **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1.2] [AS-004]** and the Proposed Development is described in full in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]** and shown spatially on the **Works Plans [EN010158/APP/2.3.3] [REP1-005]**.

1.3. The Proposed Development

1.3.1. The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure

and an underground cable connection to the National Grid East Claydon Substation.

1.3.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').

1.3.3. The location of the Proposed Development is shown on **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3] [APP-061].** The Proposed Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3.3] [REP1-005]** within which the Proposed Development can be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3] [APP-061]**. Land within the Order Limits is known as the 'Site'.

2. Review of research and guidance

2.1. Cattle and Sheep

2.1.1. The presence of excessive noise can affect the health and behaviour of farm animals. Long-term exposure to noise may lead to welfare deterioration, behavioural disorders, or the development of anxiety and fear. Noise can cause changes in physiological parameters (acceleration of heart rate, elevation of cortisol levels), leading to weakened immunity and pathological changes, and consequently reducing productivity (lactation, fattening, delayed oestrus, etc.) (Olczak et al., 2023) **[Ref 1]**.

2.1.2. Sheep have a better ability to perceive higher frequency sounds than humans with hearing frequency ranges between 23 Hz to 35 kHz for cattle (Heffner and Heffner, 1983) **[Ref 2]** and 125 Hz to 42 kHz for sheep (Kendrick, 2008) **[Ref 3]**. In comparison, the human hearing range is generally between 20 Hz and 20 kHz.

2.1.3. No research has been identified which reliably sets out the response of horses, cattle and sheep to noise and vibration from construction activities. However, studies considering rapid onset events (low flying aircraft, helicopters, humans shouting and slamming metal gates), as well as noise from operating farming machinery, have been published.

2.1.4. Research reviews published by Broucek (2014) **[Ref 4]** and more recently by Olczak et al. (2023) **[Ref 1]** provide a summary of findings relating to animal response to noise. The following key findings relevant to cattle and sheep are presented (metrics are as stated within the respective publications):

- Sudden noise of 105 dB could decrease the quantity of milk at the next milking (Kauke, 2010) **[Ref 5]** and decreases milk yield and intensity of release (Kovaćik, 1971) **[Ref 6]**.
- Thresholds for discomfort for cattle was noted at 90-100 dB, with physical damage to the ear occurring at 100 dB (Phillips, 2009) **[Ref 7]**.
- Noise made by humans shouting and slamming metal gates increases heart rate and activity in cattle (Waynert et al., 1999) **[Ref 8]**.
- The sound of a tractor engine (97 dB) significantly increased glucose concentration and leucocyte counts and markedly reduced the level of haemoglobin in the blood of dairy cows (Broucek, 1983) **[Ref 9]**.
- Exposure to noise-generating farm machinery such as tractors and work tools can allow animals to become habituated to sound. At a noise level of 90 dB(A), milking cows stopped eating for up to five minutes however on the third day they did not notice when the noise started (Šottnick, 2011) **[Ref 10]**.

- Continuous noise up to 80 dB had no negative effect on dairy cows (Kovaćik, 1971) **[Ref 6]**.
- Noise at 75 dB increased average daily weight gain of lambs and improved their feed efficiency compared to the group exposed to 100 dB. No differences were detected between the 75 dB and 63 dB control group (Ames, 1971) **[Ref 11]**. Acclimatisation to sound was evident (Ames, 1978) **[Ref 12]**.

2.1.5. BS 5502-32:1996 **[Ref 13]** provides guidance that in the absence of any quantitative levels with regard to the effect of noise on animals, it is recommended that the maximum daily exposure (eight hours) should be 90 dB(A).

2.2. Horses

2.2.1. Sudden loud noises may scare horses, causing an immediate, rapid reaction that can endanger the safety of the animal. However, little data is available which correlates short- or long-term adverse effects with specific levels of noise and vibration associated with construction or operational noise from industrial facilities.

2.2.2. The British Horse Society (BHS) publishes guidance on noise and routes used with horses **[Ref 14]**. This advises that horses can become accustomed to noise, whether short sharp sounds, continuous or discontinuous noise. However, the level of acceptance will vary. If a human may be disturbed by a noise, then so may a horse be disturbed, but a horse may be concerned about sounds which humans recognise and dismiss instantly as no threat. The hearing range for horses extends from 55 Hz to 33 kHz (Heffner and Heffner, 1983) **[Ref 2]**, indicating sounds at ultrasound frequencies inaudible to humans can be audible to horses.

2.2.3. Temperament and experience will affect whether individual horses can become habituated to noise or whether their distress level continues or rises, therefore it should not be assumed that a noise that is accepted by one horse will be accepted by all.

2.2.4. The BHS recommends considering how similar a noise may be to a natural predator as a useful guide to whether a horse will be troubled by it. A quiet rustling is likely to have greater impact than a high speed train because the former could easily be associated with a predatory animal moving into position to attack, whereas flowing motor traffic is a continuous steady loud noise which is less likely to be a predator (it can be heard from far away and the majority of horses these days have been exposed to and accepted commonly occurring mechanical noises from their birth). There are many situations of horses unperturbed by trains or motor traffic, even for the first time, in fields or on bridleways alongside a railway or motorway (BHS, 2025) **[Ref 14]**.

2.2.5. The BHS provides further guidance **[Ref 15]** on how contractors can manage construction noise impacts on equine receptors when working in the vicinity of routes or areas used by horses. This includes:

- All members of the construction and operational work force and visitors should be made aware of the equestrian routes or areas used by horses which may be affected by the Proposed Development.
- If a banksman is employed to control vehicle movements and activities they should be fully briefed about the possibility of horses being in the area and the necessary actions to be taken for the safety of horse and rider or driver and others in the vicinity.
- Warning notices should be displayed in advance of reaching the site describing the hazards for both equestrians and the construction site workers or visitors and requesting the co-operation of all.
- Operators must be able to shut off machinery or to stop movement and noise while horses pass and avoid starting up a machine or initiating movement while horses are in range.
- Machinery or activity should not resume until horses are at least twenty metres past. If it is not possible for activity to be halted, staff should be at the location to warn approaching equestrians as appropriate. Such ‘sentries’ should be obvious on approach, not hidden behind a tree or equipment as suddenly appearing could be an additional stress factor causing a horse to react.
- If a horse appears distressed—freezes, jerks sideways, prances about, takes flight, spins round or shies away or acts in any way other than a calm forward motion—or an equestrian appears to be struggling for control, or shouts, all movement and noise should cease immediately to avoid escalating the situation. Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or more than fifty metres away.

3. Outline approach to mitigating noise and vibration impacts

3.1. Approach to mitigation

3.1.1. It is acknowledged that Preston Farms Limited and TCS Biosciences Ltd are at risk of adverse impacts due to sudden noise and vibration generated by works undertaken in close proximity. Appropriate noise reduction measures will therefore need to be applied to avoid or reduce the risk of effects.

3.1.2. The design has adopted a series of measures 'embedded' into the Proposed Development to avoid or reduce the potential stress on animals as far as practicable, for example by the considered placement of infrastructure, for example, locating the Battery Energy Storage System within Parcel 2 of the Site which is at a sufficient distance from areas of horse grazing associated with Preston Farms Limited and TCS Biosciences Ltd. This has been supplemented by additional measures, to avoid and reduce the level of noise and vibration.

3.1.3. The approach to measures to reduce noise and vibration will vary depending on the location, nature and duration of activities being carried out. Engagement with Preston Farms Limited and TCS Biosciences Ltd during the post-consent, construction, operational (including maintenance) and decommissioning phases will be key to ensuring measures are effective at reducing the risk of noise and vibration impacts on horses, cattle and sheep.

3.1.4. The scope of the measures proposed to reduce noise and vibration are presented in the following sections.

3.2. Construction and decommissioning

3.2.1. Construction activities would involve the use of a variety of working methods, with the resultant noise and vibration levels experienced by a receptor varying over time as the distances to plant items change and the type of construction activity changes.

3.2.2. For the purposes of the assessment, the following primary construction activities have been considered:

- Vegetation clearance;
- Boundary fencing;
- Topsoil strip/site preparation;
- Preparation of Construction Compounds;
- Access track construction;

- Solar PV module installation works;
- Bulk earthworks to BESS, Rosefield Substation and Collector Compound sites;
- Construction of BESS, Rosefield Substation and Satellite and Main Collector Compound(s);
- Cable trenching;
- HDD;
- Use of Construction Compound(s); and
- Highway improvement works – road widening.

3.2.3. **Table 3.1** presents the unmitigated noise levels at various distances from the construction activities, by calculating the noise reduction with distance in accordance with British Standard 5228-1:2009+A1:2014.

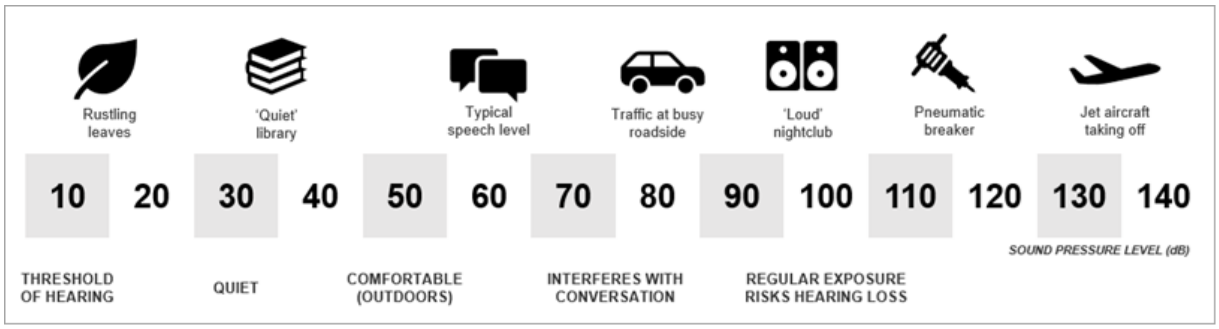
Table 3.1: Predicted construction phase noise levels (unmitigated)

Construction activity	Noise at range of setback distances, dB $L_{Aeq,T}$					
	25m	**50m**	**100m**	**150m**	**200m**	**250m**
Vegetation clearance	83	76	68	64	61	58
Boundary fencing	77	70	62	58	55	52
Topsoil strip/site preparation	73	66	58	54	50	48
Preparation of Construction Compounds	75	67	60	55	52	50
Access track construction	76	68	61	56	53	51
Solar PV module installation works	81	73	65	61	58	56
Bulk earthworks to BESS, Rosefield Substation and Collector Compound sites	79	72	64	60	57	54
Construction of BESS, Rosefield Substation, and Collector Compounds	75	68	60	56	52	50
Cable trenching	75	67	60	55	52	50
HDD	77	69	62	57	54	52

Construction activity	Noise at range of setback distances, dB $L_{Aeq,T}$					
	25m	**50m**	**100m**	**150m**	**200m**	**250m**
Use of Construction Compound	69	61	54	49	46	44
Highway improvement works - road widening	73	66	58	54	51	48

3.2.4. For context purposes, the following indicative decibel scale is provided.

Figure 3.1: Indicative decibel scale



3.2.5. Proposed measures to reduce noise and vibration during the construction and decommissioning phases are included within the **Outline Construction Environmental Management Plan (CEMP) [EN010158/APP/7.2.3], Outline Decommissioning Environmental Management Plan [EN010158/APP/7.4.3],** and measures embedded into the design are outlined and secured in the **Design Commitments [EN010158/APP/5.9.4]** and **Works Plans [EN010158/APP/2.3.3] [REP1-005]**. Mitigation measures include:

- Control of noise

– Between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors.

– Where on-site works are to be conducted outside of the core working hours, they will comply with any restrictions agreed with the relevant planning authority and reflected in the detailed Construction Environmental Management Plan(s), in particular regarding the control of noise and traffic. Compliance with these noise limits will ensure 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.

– Potential disturbance to horses, cattle and sheep 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 addition, the control measures with regards to noise set out in the BHS document 'Advice on construction sites and horses' would be implemented, where applicable.

- Temporary noise barriers

– Potential disturbance to horses, cattle and sheep 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 horses, cattle and sheep. This may include temporary noise barriers installed close to noise-producing plant to minimise construction induced noise levels (where practicable).

– Temporary noise barriers could comprise a well-constructed site hoarding or a proprietary temporary barrier system that can be rapidly installed and modified on Site to screen specific construction activities. In all instances, the hoarding/barrier should be free from gaps, holes, slits or cracks, with no gaps between the barrier and the ground.

- Piling

– Mitigation measures for piling works are typically applied at the source in the form of shrouds and/or resilient pads between the pile and the driver. Noise reduction from these measures should be expected to be in the range of 10-15 dB.

– In accordance with best practicable means, it may be feasible to adapt rotary bored piling methods for the PV frame foundations to reduce noise and vibration in higher risk areas.

- Construction traffic management and access routes

– During construction, the appointed contractor(s) will ensure that the impacts from construction traffic on local businesses are minimised, where reasonably practicable by implementing the measures set out in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058],** and the **Outline Construction Traffic Management Plan (CTMP) [EN010158/APP/7.5.3].**

– The **Outline CTMP [EN010158/APP/7.5.3]** includes details on construction logistics and construction worker travel; alongside controls to guide the delivery of material, plant equipment and staff during the construction phase. A detailed Construction Traffic Management Plan will be required to be produced by the contractor(s) and agreed with the relevant highways authorities prior to the commencement of construction activities.

- Best practicable means

– Where practicable, temporary enclosures will be used to screen all static or semi-static plant from noise sensitive receptor locations.

– All engine compartments or acoustic enclosures are closed whilst engines are running.

– Minimise drop heights of materials i.e. carefully depositing materials.

– Avoid vehicle movements over irregular surfaces (which tends to create more noise/vibration emissions).

– At all times, workers' shouting or raised voices to be kept to a minimum.

– All plant, equipment and noise control measures applied to plant and equipment to be maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable.

– Any plant, equipment or items fitted with noise control equipment found to be defective will not be operated until repaired.

– Machines in intermittent use to be shut down or throttled down to a minimum during periods between works.

– A quiet working ethic will be employed to ensure that all members of the workforce have consideration for the nearby residents and businesses.

– Prohibit sounding of vehicle horns to gain access to the Primary and Secondary Construction Compounds.

– Adoption of a very low speed limit for vehicles travelling on the construction route, through and adjacent to fields occupied by horses, cattle and sheep.

– The location of the construction route up to Parcel 3 within the proposed corridor will be subject to consultation Preston Farms Limited and TCS Biosciences Ltd and will be located to minimise potential disturbance to their horses, cattle and sheep, where technically feasible.

– The delivery routes set out in the **Outline CTMP [EN010158/APP/7.5.3]** will be communicated to and adhered to by all suppliers.

– Design the Primary Construction Compound and Secondary Construction Compound layouts to reduce the need for reversing vehicles and ensure that drivers are familiar with the worksite layout.

– Utilise reversing alarms incorporating one or more of the features listed below (or other comparable system):

  - Highly directional sounders
  - Use of broadband sounders
  - Self-adjusting output sounders
  - Flashing warning lights

- Reversing alarms that are set to the minimum output noise level required for health and safety compliance.

– Toolbox talks carried out by the Principal Contractor to ensure that all members of the workforce are aware of potential noise impacts on the sensitive receptors in the surrounding area.

3.3. Operation (including maintenance)

3.3.1. To inform the noise assessment presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**, operational phase noise prediction modelling has been undertaken.

3.3.2. It is anticipated that the noise emitting equipment will be refined as part of the detailed design. This design development may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits, which will be in accordance with the parameters secured within the **Works Plans [EN010158/APP/2.3.3] [REP1-005]** and **Design Commitments [EN010158/APP/5.9.4].**

3.3.3. The operational noise emissions will generally be steady-state or gradually increasing/decreasing and therefore are unlikely to cause disturbance to horses, cattle and sheep. Notwithstanding this, mitigation measures to reduce operational noise have been introduced to minimise the likelihood of adverse effects.

3.3.4. The operation (including maintenance) design has adopted a series of measures 'embedded' into the design of the Proposed Development to avoid or reduce the potential stress on animals as far as practicable, for example:

- Adoption of low-noise equipment;
- Maximising separation distances, where feasible; and
- Orientating equipment away from sensitive receptors, where emissions were directional.

3.3.5. Additional measures have been introduced to further control noise levels at surrounding sensitive receptors. Proposed mitigation measures during the operation (including maintenance) phase are included within the **Outline Operational Environmental Management Plan (OEMP) [EN010158/APP/7.3.3]** and measures embedded into the design via the **Design Commitments [EN010158/APP/5.9.4].** Mitigation measures include:

- Control of noise

– In the case of the main transformers being a major component of the acoustic emissions from the Proposed Development, it is proposed that

a minimum 5 dB(A) reduction is obtained at source through refinement of the engineering requirements in order to adopt lower noise emitting transformers.

- Noise barriers

– The following noise barriers will be implemented during the operational phase to minimise noise emissions:

  - 3.5m high barrier around the BESS container areas;
  - 5m high barrier around sections of the boundary of the Rosefield Substation;
  - 3.5m high absorptive barriers around Central Inverters that are impacting upon noise-sensitive receptors; and
  - Introduction of enclosures and/or barriers around the main transformers within the Rosefield Substation and Satellite Collector Compound

– Barriers should be constructed using a suitably dense material, with no holes or gaps around or underneath.

- Compliance monitoring

– Noise measurements of the installed operational equipment will be undertaken to verify that noise levels at source align with values used within the noise prediction model prepared at the detailed design stage, as defined in the **Outline OEMP [EN010158/APP/7.3.3].**

- Complaints procedure

– In the event of a noise related complaint being received during the operational phase, the following procedure would typically be adopted:

  - Community Liaison Officer to log noise complaint and advise complainant on the steps that will be taken. During this period, further details of the noise complaint will be established, including, but not limited to, the characteristics of the noise source and when it occurs.
  - Community Liaison Officer to notify the Environmental Health department at Buckinghamshire Council regarding the complaint that has been received.
  - Representative of Rosefield Solar Farm will carry out an inspection of noise emitting equipment associated with the development in the locality of the complainant property, to establish that it is operating as intended, and that the installed mitigation measures are in place and working effectively.
  - In the event that defects (or other issues) are encountered to either the noise emitting equipment or any associated mitigation measures during the Site inspection, this would trigger the requirement for appropriate remedial actions to be taken. Upon

completion of the remedial works, additional noise measurements of the affected unit(s) would be taken to verify noise levels at source align with values used within the noise prediction model.

- If the noise monitoring undertaken (post-remedial works) demonstrates that the source levels are higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed.
- Where no noise defects are encountered during the Site inspection, the requirement for additional noise monitoring would be discussed and agreed with the Environmental Health department at Buckinghamshire Council. As part of this, consideration would be given to the on-going noise monitoring that has been undertaken.
- Details of the noise complaint and the remedial actions that have been taken would be recorded in a complaint investigation document that would be provided to the Environmental Health department at Buckinghamshire Council and also the complainant, as appropriate.
- The complainant will be kept informed of the steps being taken as part of the complaint investigation, via the Community Liaison Officer.

- Maintenance Vehicles
  - To control noise and vibration from vehicular access required for maintenance purposes, the relevant control measures adopted during the construction phase will apply, as noted below:
    - The location of the access route will be subject to consultation with Preston Farms Limited and TCS Biosciences Ltd and will be located to minimise potential disturbance to their horses, cattle and sheep, where technically feasible.
    - Adoption of a very low speed limit for vehicles travelling on the access route adjacent to fields occupied by horses, cattle and sheep.

3.3.6. **ES Volume 3, Figure 13.4: Operational Phase Noise Contours (with additional mitigation) [EN010158/APP/6.3.3]** presents the mitigated noise contours. The predicted noise levels beyond the Order Limits within Preston Farms' boundary are in the order of 40-45 dB(A) in the vicinity of the BESS, and less than 40 dB(A) elsewhere. The noise levels will reduce with increased setback distance from the noise emitting equipment, as shown in the figure.

3.3.7. Within certain parts of the Preston Farms' grazing fields, there is potential that the horses, cattle and sheep may currently be exposed to noise levels which exceed the predicted operational phase noise levels generated by the Proposed Development e.g. in the vicinity of local road links which

bound certain fields, where noise levels of 55-60 dB $L_{Aeq,16hr}$ at 10m would be anticipated. Other short-term events will also generate elevated noise levels, such as agricultural works involving noise emitting plant/machinery, and aircraft movements.

4. Conclusion

4.1.1. This technical note has been prepared on behalf of the Applicant following representations received by consultees regarding the impact of noise and vibration on horses, cattle and sheep in the area surrounding the proposed Order Limits.

4.1.2. This document has reviewed available research and guidance to identify the risk to horses, cattle and sheep from elevated levels of noise and vibration.

4.1.3. Based upon available guidance, an approach to mitigating impacts has been identified through all stages of the Proposed Development. This includes a commitment to engage with nearby receptors throughout the construction, operation (including maintenance) and decommissioning phases to monitor and mitigate noise and vibration from the Proposed Development.

5. References

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Appendix 2
Response to CSAG Biodiversity

CSAG Dominic Woodfield	Applicant's response
Bioscan's walkover found that the UKHab mapping presented at Figure 3 of PEIR Appendix 7.7 (PEA 2024) contains some errors and oversimplifies the position on the ground. One particular area of omission/error relates to the field margins of arable fields (cropland) in Parcel 1. Whilst the presence of arable field margins is mapped in Parcel 2 and 3 field units, this is inexplicably not the case for Parcel 1, despite the presence of such features in "all surveyed fields in parcel 1" being specifically remarked upon at 3.2.25 of Appendix 7.7. Figure 3 of that report instead subsumes these margins within the wider field unit as an extension of the arable/cropland/cereal crops. This is despite their size exceeding the minimum mapping unit applicable under the UKHab methodology. This amounts to an erroneous and unwarranted misrepresentation of baseline conditions and a suppression of value. Some of these field margins have a not insignificant complement of neutral grassland indicator species such as knapweed and meadow barley – others are tussocky with a significant *Deschampsia* component (see photograph 1 below). Such features will be highly important for supporting farmland species and facilitating their dispersal and movement through the landscape, and some at least will be representations of Priority habitat. Certain scarce species recorded in the prospective applicant's surveys (e.g. grasshopper warbler) will almost certainly only have been present by virtue of these habitats. They are also likely to be a critical resource for bat foraging and for farmland birds, amphibians and potentially also reptiles.	Since the 2024 PEA these arable field margins have been added into the UKHab mapping as separate polygons within Parcel 1 and included within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].**
It is further noted that no condition assessment has yet been presented for any of the habitats. Bioscan noted that some of the grasslands mapped as 'modified' on the site had sufficient species diversity to elevate them to 'moderate' or 'good' condition and/or to be classified as Lolium-Cynosurus neutral grassland, or even other neutral grassland. The prospective applicant proclaims confidently that it will be able to design a scheme that compensates sufficiently for impacts and achieves the mandatory 10% biodiversity net gain, but it is unclear how it has arrived at that conclusion without determining the condition	The condition assessment sheets for all habitats have been presented within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].**

of the habitats it has mapped, and which will be impacted. If it *has* determined their condition, that information could usefully have been presented now (and it would have been in the prospective applicant's interest to do so) such that its accuracy could be determined, and if necessary corrected, prior to the application.	
The waxcap *Cupophyllus virgineus* was noted in permanent pasture adjoining Sheephouse Wood (Field B7), suggestive that a survey of the permanent grasslands on the site for grassland fungi might be worthwhile. This highlights the related point that it is unclear to what extent the prospective applicant's surveys have been duly scoped with the LPA and statutory and non-statutory consultees, in accordance with good EIA practice. A thorough scoping exercise can help avoid survey omissions.	It is correct that no detailed waxcap surveys have been undertaken as a single fungi observation was insufficient to warrant it. However, it should be remembered that as secured within the **Outline LEMP [EN010158/APP/7.6.3],** Field B7 will have 15m wide margins that will support a mixture of grassland and scrub habitat. In addition, although Solar PV modules will be placed in the field, the grassland sward will remain and the above ground fruiting body is only one small part of fungi plants, the vast underground hyphae will remain and continued management of the grassland is likely to enable fungi to continue to exist.
We note that the prospective applicant has given specific consideration to arable plants (paras 3.3.23-3.2.26 of Appendix 7.7) which is welcomed, and which represents progress on a matter that is so commonly neglected in solar farm EIAs affecting arable habitats. However, the comments and conclusions presented in these paragraphs are rendered somewhat unconvincing by the depauperate species list presented at para 3.2.26. For such a large site area, on these soils, Bioscan would expect a list of arable plants several times the length of this one to be obtained from anything close to a thorough consideration of this matter	Survey for notable arable plants was undertaken at the appropriate time of year by an experienced botanist with Field Identification Skills Certificate (FISC) level 4, and the list of species recorded is a true reflection of what surveyors recorded on-site. It was also noted that a lot of arable margins had been grassed down and that the interface between grass margins and arable crops was often 'clean'; indicating

	herbicide use, both actions reducing the potential for scarce arable weeds to be present. A lack of notable arable plants recorded does not mean that a thorough consideration was not given, rather that these species weren't present and therefore could not be recorded. The results of the arable weed survey are presented in **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093].**
Bioscan's walkover of 27th November noted a suite of bird species consistent with that recorded in the prospective applicant's non-breeding bird surveys, with some notable differences: - Significantly greater numbers of starling were present on 27/22/2024 (flock size estimate 600 birds) than on any of the prospective applicant's wintering birds surveys. - Significantly higher numbers of herring gull and black-headed gull were also noted using the fields. - The numbers of bullfinch and reed bunting noted on Bioscan's visit suggest a significantly higher presence than is conveyed by the prospective applicant's wintering or breeding bird survey information (see e.g. Figures 2b(i) and 2b(ii) of Appendix 7.12 of the PEIR) It is noted that in 2023-2024, a mere four wintering bird survey visits were undertaken by the prospective applicant's consultants, which is short of accepted guidance1. Whilst better temporal coverage was achieved in 2021-2022, only one visit that winter was completed within the peak midwinter period of Dec-Jan. Taken together with the results of Bioscan's brief and partial walkover discussed above, and the fact that spatial coverage achieved in the prospective applicant's surveys was far	It should be noted that any bird survey is a snapshot in time and numbers of birds recorded will vary. The Applicant has carried out two seasons of both breeding and wintering bird surveys. With regards only 4 wintering visits being carried out in 2023/4, the current guidance (http://birdsurveyguidelines.org/wp-admin) states that up to 5 winter visits should be carried out but also gives the flexibility to justify if less survey effort is appropriate. Given that the Applicant already had one full winters bird survey the decision was made by the Applicant to reduce the wintering coverage in 2023/4 to 4 as opposed to 5 visits. The full results of all the bird surveys carried out have been presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the

from complete (see below), this rather undermines the faith that can be had in the robustness of the wintering bird work – particularly in respect of use of the site by species such as snipe, lapwing and golden plover and by scarcer raptors, which are all key receptors given their particular vulnerability to displacement by solar schemes.	Applicant considers the evidence base sufficiently robust to inform the assessment.
In respect of the other surveys carried out, the standard of ecological information collected to date appears broadly in line with the requirements for EcIA, having regard to the nature of the development and its likely zone of influence. Survey coverage is however incomplete, and whilst the prospective applicant acknowledges this, its comments around further surveys to support the ES (e.g. at section 7.14 and 7.15 of the PEIR) do not seem to suggest sufficient coverage in further surveys is intended, nor sufficient commitment to ensuring a robust baseline for assessment, despite the claims otherwise.	Further survey work has been completed since the PEIR was produced as outlined within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the Applicant considers the evidence base sufficiently robust to inform the assessment.
The main information gap to draw attention to at this stage is the absence of adequate ecological information and/or survey coverage for the significant tracts of land within the indicative site boundary identified for "*underground cable routes, access tracks and temporary construction compounds (locations to be determined)*" (Zonal masterplan – PEIR Figure 1.2). The total area of this land category amounts to approaching 50% of the land falling within the 'indicative site boundary', meaning that approaching 50% of the project area has not yet been surveyed to the level of detail that would be expected to support a Development Consent Order application. By comparison with the survey results and/or coverage (e.g. transect routes) shown on the maps in the supporting reports at Appendices 7.1-7.12, it would similarly appear that only the 2024 PEA (habitats) and the preliminary aquatic survey report cover the entirety of the 'indicative site boundary'. This means that coverage for relevant ecological receptors (bats, wintering and breeding birds, great crested newts and other taxa such as badgers) is also deficient. There appears to have been no survey coverage for certain other taxa (such as invertebrates) at all. Given the scope for cable installation, haul roads and temporary	Since the PEIR was published, the Interconnecting Cable Corridor(s) and Grid Connection Cable Corridor and other areas have been subject to Preliminary Ecological Appraisal, as set out within the **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4] [APP-093].** A full justification to the survey work that has occurred is given within **the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the Applicant believes the assessment is sufficient and robust against which to assess the impacts of the Proposed Development.

construction compounds to impact on key receptors (identified or as yet unidentified) in these areas - for example via impacts on hedgerows that are likely to be of key importance for critical taxa of interest known from the locality (such as rare bats and butterflies) – this signposts that the conclusions of the PEIR are very much provisional and not to be relied upon as determinative of the potential ecological impact of the scheme.	
"*Monitoring of solar farms in the UK has shown that they can provide habitats for rare and vulnerable species like skylark and brown hares, as well as support a wide range of plants.*" The actual position from monitoring of solar farms, especially those sited on arable land or permanent grassland, is that they generally displace bird species that favour open country - such as skylark. Bioscan has recently reviewed the collective studies and literature around this issue and as far as it is aware the solar industry collectively has yet to be able to demonstrate successful breeding by skylark within a solar array. For such reasons, numerous solar schemes are now having to commit to off-site compensatory provision for skylark, involving S106 legal agreements with third party landowners. It is notable that this likely impact and the likely need for compensatory habitat provision for this species and others, is not explicitly acknowledged in the PEIR, or its supporting appendices. Based on the prospective applicant's own data, it is possible that in excess of sixty skylark breeding territories could be displaced, and even with the apparent recent uplift in land set aside for landscaping and compensatory habitat creation, that number of displaced territories is unlikely to be accommodated within the site boundary. Securing appropriate compensation for such displacement will be a significant undertaking and decision-makers will needto have, at the very least, confidence that it is achievable.	A suite of on-site mitigation measures are presented for ground nesting birds including skylark including 95ha without solar PV development for nesting sites, winter seed provision and increasing the biomass of invertebrates species during the breeding season. Measures are fully detailed in the **Outline LEMP [EN010158/APP/7.6.3].** Measures would also likely benefit hares.
We draw attention again to our comments above about the UKHab errors and the shortfall in adequacy of coverage of the ecology surveys as compared with the land affected by the scheme and/or within the indicative project area.	Comments in relation to UK habitat surveys and other survey coverage is outlined above and detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the Applicant considers the evidence base sufficiently robust to inform the

The implied suggestion in the first sentence that the ecology surveys have been comprehensive is therefore misleading. While the increased amount of land set aside for "landscaping and environmental enhancement initiatives" is to be welcomed, such land allocation is likely necessary in order for the scheme to be able to meet *minimum* statutory requirements to compensate for habitat losses and impacts and deliver the mandatory minimum of 10% biodiversity net gain as measured by the Statutory Biodiversity Metric. It is also important to acknowledge that a +10% compliant result from using the Biodiversity Metric does not necessarily equate to a 10% increase in biodiversity. Amongst other things, the Metric only deals with habitats as a proxy for interest and does not account for species interest. Therefore, a scheme that will result in wholesale loss or displacement of the site's rare bat and declining farmland bird assemblages could, under the BNG Metric, deliver the same 'score' as one that would not. As a further example, the BNG regime would not capture or factor in to its quantitative measures the anticipated level of skylark displacement referred to above.	assessment and that sufficient mitigation is provided to offset the impacts of the Proposed Development.
The same caveats and cautions apply to the proponents claim that "*we will design a detailed biodiversity plan for Rosefield Solar Farm to deliver a 'net gain' in biodiversity*". In the absence of robust evidence of tangible gains across the full suite of taxa that comprise the site's biodiversity, not just habitats, such statements would be better couched in terms of the scheme being designed to be able deliver a 'net gain' in biodiversity "on paper". Given the incomplete surveys, the errors and omissions cited above and the inherent risks of significant negative impacts on scarce and/or declining fauna from displacement, the case that genuine biodiversity gain will arise from this scheme is simply not yet made out, nor indeed is the case that net biodiversity loss can and will be avoided.	Comments in relation to UK habitat surveys and other survey coverage is outlined above and detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** and the Applicant considers the evidence base sufficiently robust to inform the assessment and that sufficient mitigation is provided to offset the impacts of the Proposed Development.
Bioscan's walkover found that the UKHab mapping presented at Figure 3 of PEIR Appendix 7.7 (PEA 2024) contains some errors and oversimplifies the position on the ground. One particular area of omission/error relates to the field margins of arable fields (cropland) in Parcel 1. Whilst the presence of arable field margins is mapped in Parcel 2 and 3 field units, this is inexplicably not the case for Parcel 1, despite the presence of such	Since the 2024 PEA these arable field margins have been added into the UKHab mapping as separate polygons within Parcel 1 and included within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].**

features in “all surveyed fields in parcel 1” being specifically remarked upon at 3.2.25 of Appendix 7.7. Figure 3 of that report instead subsumes these margins within the wider field unit as an extension of the arable/cropland/cereal crops. This is despite their size exceeding the minimum mapping unit applicable under the UKHab methodology.

This amounts to an erroneous and unwarranted misrepresentation of baseline conditions and a suppression of value. Some of these field margins have a not insignificant complement of neutral grassland indicator species such as knapweed and meadow barley – others are tussocky with a significant *Deschampsia* component (see photograph 1 below). Such features will be highly important for supporting farmland species and facilitating their dispersal and movement through the landscape, and some at least will be representations of Priority habitat. Certain scarce species recorded in the prospective applicant’s surveys (e.g. grasshopper warbler) will almost certainly only have been present by virtue of these habitats. They are also likely to be a critical resource for bat foraging and for farmland birds, amphibians and potentially also reptiles.

It is further noted that no condition assessment has yet been presented for any of the habitats. Bioscan noted that some of the grasslands mapped as ‘modified’ on the site had sufficient species diversity to elevate them to ‘moderate’ or ‘good’ condition and/or to be classified as Lolium-Cynosurus neutral grassland, or even other neutral grassland. The prospective applicant proclaims confidently that it will be able to design a scheme that compensates sufficiently for impacts and achieves the mandatory 10% biodiversity net gain, but it is unclear how it has arrived at that conclusion without determining the condition of the habitats it has mapped, and which will be impacted. If it *has* determined their condition, that information could usefully have been presented now (and it would have been in the prospective applicant’s interest to do so) such that its accuracy could be determined, and if necessary corrected, prior to the application.

The condition assessment sheets for all habitats have been presented within the **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060].**

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