



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Rosefield Solar Farm – Buckinghamshire Council's
comments on the Applicant's Response to the Local
Impact Report**

Buckinghamshire Council

May 2026

Introduction

This document has been prepared by Buckinghamshire Council in response to the Applicant's written response to the Council's Local Impact Report (LIR) for the proposed Rosefield Solar Farm (Planning Inspectorate Reference: EN010158).

The purpose of this submission is to provide reasoned commentary on the Applicant's responses, identifying areas of agreement where these have been reached, and, where necessary, clarifying the Council's position where matters remain outstanding. In doing so, the Council has sought to engage constructively with the substance of the Applicant's case, whilst ensuring that the impacts identified in the LIR are properly tested and understood.

The Council's comments focus on whether the Applicant's responses adequately address the planning, environmental and heritage concerns previously raised, and whether the conclusions presented are supported by evidence and proportionate assessment. Where the Council considers that the Applicant's response does not resolve or sufficiently engage with those matters, this is set out.

Where no comment is provided, this should not be interpreted as agreement with the Applicant's position. The Council's position, as set out in the Local Impact Report, remains unchanged unless expressly stated otherwise.

Unless expressly stated, the content of this document does not represent a change in the Council's overall position as established in the LIR. The Council maintains that the identified harms must be considered in the round and in the context of the overall planning balance.

Table 3-1: Introduction

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
1.1	Exec. Summary Para. 1	Comment that the LIR sets out Buckinghamshire Council's overarching position which is that the policy threshold for the refusal of the Proposed Development is met.	<p>The Applicant respectfully disagrees with Buckinghamshire Council's position on this. As noted and justified in Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016], the combined benefits of the Proposed Development outweigh any residual effects and the planning balance is firmly in favour of approval.</p> <p>The Proposed Development has been designed in accordance with the mitigation hierarchy and any mitigation proposed has directly responded to key constraints in the surrounding area. Detail of this is set out in each technical chapter of the ES and the Policy Compliance Assessment Tables at Appendix 4 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016].</p> <p>The Applicant wishes to note that the other issues raised by Buckinghamshire Council in the executive summary section of the LIR have been captured through the Applicant's responses to each relevant topic matter in this document.</p>	<p>Respectfully, the Council disagrees and maintains its position that the policy threshold for refusal is met.</p> <p>The Applicant's response fails to properly engage with and resolve the harms identified in the LIR. Those harms are not isolated matters but operate collectively across landscape, heritage, ecological, economic and design considerations, including the siting of the BESS.</p> <p>While reference is made to the mitigation hierarchy and embedded mitigation, the Council's position remains that the Scheme does not adequately demonstrate avoidance of harm. In several respects, the impacts identified arise from layout and locational of the arrays and BESS, rather than matters capable of resolution through mitigation alone.</p> <p>The Applicant's reliance on its ES conclusions and characterisation of residual effects is noted; however, the Council does not agree that these effects are appropriately defined or that their weight has been properly reflected in the overall planning balance.</p> <p>The Council therefore considers that the Applicant's response does not alter the conclusions of the LIR. Detailed reasoning is set out under the relevant topic headings.</p>

Table 3-2: Need, Site Selection and Alternatives

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Approach to the Consideration of Alternatives, Including Location, Scale and Technology				
2.1	4.2.1 & 4.2.14	Comment that the assessment of alternatives is not proportionate to the scale, sensitivity or potential impacts of the Proposed Development.	<p>The Applicant respectfully disagrees with this statement. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. This process explains that the starting point for the site selection process was the identification of capacity at the National Grid East Claydon Substation. A 10km radius from this substation was established as a viable Search Area for a potential solar scheme and, within this Search Area, the Site chosen was considered available and suitable for large scale solar deployment, from an irradiance and topography perspective, and having regard to environmental and planning constraints.</p>	<p>The Planning Statement confirms that the site selection process was fundamentally grid-led, with a 10km Search Area defined around the point of connection and a subsequent focus on land in closest proximity, including the identification of a single willing landowner. This approach materially constrains the range of alternatives considered at an early stage and limits the extent of any comparative assessment across a wider geographical or strategic context.</p> <p>There remains limited evidence of a transparent and comparative evaluation of alternative sites, configurations, or smaller-scale options, including how such alternatives were assessed against environmental and planning constraints before being discounted. In particular, the extent to which alternatives outside the defined Search Area, or less impactful design responses, were considered is not clearly evidenced.</p> <p>The Council therefore maintains its position that the assessment of alternatives, as presented, is not proportionate to the nature and potential effects of the Proposed Development, and does not provide a sufficiently robust justification for the selection of the Site.</p>
2.2	4.2.1 & 4.2.14	Comment that the site selection process was framed principally around the availability of a single willing landowner adjacent to the National Grid East Claydon Substation, rather than a transparent, constraints-led evaluation across the wider 10km search area.	<p>The Applicant respectfully disagrees with this statement. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) explains that the Applicant was aware that minimising the number of landowners engaged can be beneficial for a number of reasons such as simplifying land negotiations, reducing the risk of project failure (due to added complexity of multiple land owners), and reducing reliance on compulsory acquisition in accordance with policy requirements (thereby reducing impacts on affected parties). For these reasons, single, contiguous sites with as few landowners as possible were prioritised.</p> <p>It is important to note that having regard to this benefit in the site selection process was not done at the expense of undertaking a full and exhaustive constraints-led search for suitable land within the 10km Search Area. The consideration of environmental constraints was key to the site selection process and, in accordance with sections 2.3 and 2.10 of NPS EN-3 (2023), the Applicant duly considered the following constraints:</p>	<p>The Applicant refers to a constraints-led exercise, the Planning Statement and Site Selection Report indicate that the process was, at its outset, driven by the availability of a grid connection and subsequently by the identification of a single willing landowner in close proximity to the substation. The prioritisation of contiguous land with minimal landownership constraints materially influenced the narrowing of options at an early stage.</p> <p>The Council does not dispute that factors such as grid connection, land assembly, and deliverability are material considerations. However, the effect of this approach is that the assessment of alternatives appears to have been constrained by commercial and land availability, rather than demonstrating a clear, transparent and comparative evaluation of reasonable alternatives across the wider Search Area.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<ul style="list-style-type: none"> • Irradiance and site topography; • Network connection; • Proximity of the site(s) to dwellings; • Agriculture land classification and land type; • Accessibility; • Public rights of ways; • Designated international and national ecological and geological sites; • Nationally Designated Landscapes; • Flooding; • Heritage; and • (To the extent this can be dealt with at the site selection stage) security and lighting. 	<p>There is limited evidence as to how the listed constraints were consistently and comparatively applied to alternative sites, how those sites performed relative to the chosen Site, and why other potentially suitable configurations or site options were discounted. The reliance on a limited number of landholdings is therefore not a substitute for a proper assessment of reasonable alternatives.</p> <p>The Council therefore maintains its position that the site selection process was not undertaken in a manner that provides a sufficiently transparent or proportionate evaluation of reasonable alternatives, having regard to the scale and potential impacts of the Proposed Development.</p>

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2.3	4.2.1	<p>Comment that the site selection process has mischaracterised local topography meaning that elements of the Proposed Development are located in harmful locations.</p>	<p>The Applicant respectfully disagrees that the Applicant has mischaracterised local topography. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) notes that the general topography of the area surrounding the National Grid East Claydon Substation is gently undulating, with much of the land sloping north to south, making it generally suitable for solar. The level of undulation in land across the 10km Search Area is relatively consistent.</p> <p>Once a suitable Site had been identified, and as set out in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], the topography of the Site influenced the design of the Proposed Development. Parcels 1 and 1a are identified as gently undulating with the highest point being Knowl Hill at around 116m above ordnance datum (AOD). Parcel 2 is located on a low ridge crest that continues northeast towards Steeple Claydon and East Claydon, with a high point in the south of the Parcel at 137m AOD. Parcel 3 is located on relatively flat ground at 89.95m AOD.</p> <p>Within Parcel 1, proposed Solar PV was removed from land on top of Knowl Hill, to ensure Solar PV development would not be located on the highest and most visible area within Parcel 1. Within Parcel 2, fields in the south (Fields D27, D30, D32, D33, D34, D35, D36 and D37) were removed from consideration for Solar PV development due to the topography and visual considerations, which included reducing visibility within the Area of Attractive Landscape and from the wider landscape. In addition, elements of the Proposed Development (such as the Rosefield Substation, BESS and the Main and Satellite Collector Compounds) have been located to minimise their visual impacts, as set out in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018].</p>	<p>The Design Approach Document demonstrates that topographical constraints have primarily been addressed through design iteration within the defined Site boundary, rather than through a process of identifying and selecting a site (or configuration of sites) which avoids the more sensitive landform in the first instance. The presence of elevated land, ridgelines and outward-facing slopes across the Site is therefore a baseline characteristic of the site.</p> <p>The proposed mitigation does not alter the fact that parts of the Proposed Development remain located on landforms which, by reason of their elevation and orientation, have greater potential for visibility and landscape effect. This reflects a process of accommodating development within a fixed site, rather than demonstrating that alternative sites or configurations with materially reduced topographical sensitivity were comparatively assessed and discounted.</p> <p>Accordingly, the Council maintains its position that the site selection process has resulted in development being advanced on landforms which give rise to greater landscape and visual impact than may reasonably have been achievable through a broader and more comparative assessment of alternatives.</p>
2.4	4.2.1	<p>Comment that the site selection process has failed to consider the location of the BESS against other locally consented and proposed schemes meaning that opportunities to avoid harm have been missed.</p>	<p>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.</p> <p>Paragraphs 2.10.17 and 2.10.18 of NPS EN-3 (2023) detail that to maximise <i>“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</i></p>	<p>The Applicant's response relates to the design and refinement of the scheme within the selected Site, rather than demonstrating that cumulative effects particularly the presence of other energy schemes and BESS infrastructure were a determining factor in the selection of the Site or the location of the BESS in the first instance.</p> <p>The Applicant asserts that cumulative effects have been assessed and mitigated through design, however, there is limited evidence that alternative sites or configurations were comparatively tested to avoid or materially reduce those effects at the outset. The approach therefore reflects mitigation within the site, rather than a broader evaluation of</p>

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			<p><i>capacity</i>" and, should this be the case at the site selection stage, applicants are to then consider the "<i>cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure</i>". 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.</p> <p>ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] presents a detailed Cumulative Effects Assessment which identifies relevant other existing and/or approved developments and assesses potential combined effects in accordance with established EIA methodology. This includes consideration of spatial overlap, temporal overlap and the potential for interactive effects. Cumulative interactions with nearby projects have directly informed the evolution of the design. For example, based on the operational noise assessment and iterative layout design, the BESS was intentionally located to ensure cumulative operational noise remain within the required limits, when considered alongside other existing and/or approved developments, particularly the East Claydon BESS. Similar design-led considerations were applied across other technical disciplines to ensure potential cumulative effects were minimised, wherever possible. The Applicant therefore considers that opportunities to avoid harm have not been missed and cumulative effects has been fully accounted for through a robust assessment process and proactive, iterative design process.</p> <p>Furthermore, Appendix 1: Letter to Buckinghamshire Council on BESS Locations, to this document contains the letter the Applicant sent to Buckinghamshire Council which provided the Applicant's commentary on Buckinghamshire Council's Relevant Representation with regard to the location of the battery energy storage system.</p>	<p>whether cumulative impacts, particularly that of the BESS in terms of its noise and landscape and visual impact could have been avoided.</p> <p>The Council therefore maintains its position.</p>
2.5	4.2.14	<p>Comment that the Site Selection Report appended to the Planning Statement is limited in analysis and that it does not indicate a proper approach to the avoidance of effects as part of applying the mitigation hierarchy.</p>	<p>The Applicant respectfully disagrees. The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) details that there is no standard methodology for the site selection of solar farms. The site selection methodology for the Proposed Development has therefore been informed by the following relevant national and local policy documents and regulations: NPS EN-1 (2023), NPS EN-3 (2023), NPS EN-5 (2023), the NPPF, the Vale of Aylesbury Local Plan 2013 – 2033, the NPPG and the EIA Regulations 2017.</p> <p>Furthermore, Paragraphs 4.2.28 and 4.2.29 of the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) set out the key environmental and spatial considerations which factored as key considerations in the site selection process to minimise</p>	<p>The issue is whether the process followed demonstrates a clear application of the mitigation hierarchy in practice. It is unclear that the starting point was avoidance at the site selection stage.</p> <p>Whilst the Applicant identifies relevant constraints and refers to the consideration of reasonable alternatives, this is presented largely as a narrative exercise. There is limited evidence that the process systematically identified and comparatively tested alternative sites or configurations with the objective of avoiding effects in the first instance, rather than mitigating them through design once the Site had been established.</p>

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			<p>potential impacts of the Proposed Development.</p> <p>Further detail on the reasonable alternatives that were considered for the Proposed Development are also provided in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047].</p> <p>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.</p>	<p>The reliance on design evolution and technical mitigation within the selected Site does not demonstrate that opportunities for avoidance were explored at the outset.</p> <p>The Council therefore maintains its position that the Site Selection Report provides limited analysis in this respect and does not clearly evidence a proportionate application of the mitigation hierarchy at the site selection stage.</p>
2.6	4.2.15 & 4.2.16	<p>Comment that there is no compelling evidence to suggest that other landholdings within the search area were identified, approached, assessed, or discounted on the basis of environmental, landscape or planning considerations. Further comment noting that the evidence for site selection is narrow and unduly predetermined by land control.</p>	<p>The Applicant would like to direct the Council to NPS EN-1(2023) paragraph 4.3.9 which states that <i>'this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective'</i>. Regardless of this, the Applicant has set out its approach to site selection in the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]), concluding that a logical approach was taken which sought to find land that was available and suitable for large scale solar deployment, from an irradiance and topography perspective and having regard to environmental and planning constraints within a suitable 10km radius. The Applicant took these constraints into consideration and used this to identify land that met the criteria within the Search Area. The Applicant then sought to approach owners of this land to understand their willingness for their land to be involved in the Proposed Development. As a result of this process the Applicant identified a single willing landowner located directly adjacent to the National Grid East Claydon Substation.</p> <p>In a similar sense to paragraph 4.3.9, NPS EN-1 (2023) paragraph 4.3.24 recognises that a proposed project does not have to demonstrate that it is the best option, but rather that it is acceptable under the provisions of the relevant policy. As set out in the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) the Applicant considers that the site selection for the Proposed Development followed a logical approach and that the chosen site was, and remains, acceptable under the provisions of the relevant policy.</p>	<p>Paragraphs 4.3.15–4.3.17 of EN-1 make set out that applicants are required to identify the reasonable alternatives considered and explain the reasons for the chosen option, including by reference to environmental, social and economic effects.</p> <p>The Council's concern is not that the Applicant has failed to demonstrate the "best" site, but that the evidence presented does not demonstrate a comparative assessment of alternatives.</p> <p>It is unclear how the applicant has gone about identifying:</p> <ul style="list-style-type: none"> • how alternative landholdings within the search area were identified and appraised; • whether environmental, social and economic effects were considered as differentiating factors between options; and • how the final Site was selected on that basis, rather than by reference to availability and land control. <p>The reliance on land availability and proximity to the grid may explain how the Site was identified, but does not, demonstrate that reasonable alternatives were comparatively assessed and discounted on planning grounds.</p> <p>The Council therefore maintains its position that the site selection evidence is limited and does not clearly demonstrate a proportionate and transparent consideration of alternatives.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
2.7	4.2.15	<p>Comment that only limited weight ought to be placed on the Applicant's alternatives assessment and that Buckinghamshire Council consider this points to the failure of the Applicant to avoid and mitigate certain effects.</p>	<p>The Applicant does not consider that the assessment of alternatives ought to carry weight in the overall planning balance. This is because, in accordance with Paragraph 4.3.24 of NPS EN-1 (2023), the Secretary of State "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".</p> <p>Furthermore, Paragraph 4.3.9 of NPS EN-1 confirms that a proposed project does not have to demonstrate that it is the best option but rather that it is acceptable under the provisions of the relevant policy.</p> <p>As in recent Examining Authority Recommendation Reports to the Secretary of State, such as the Fenwick Solar Farm Recommendation Report, the planning balance should be framed against the need of the Proposed Development, the effects (beneficial and adverse) concluded within the relevant environmental statement, any other material considerations and the relevant legislative test(s), such as compulsory acquisition.</p>	<p>The Council considers limited weight that should be afforded to the Applicant's alternatives assessment, given the absence of a clear and comparative evaluation of reasonable alternatives and how environmental effects have informed site selection.</p> <p>The need to avoid or reduce adverse effects at the outset have not been properly explored. Where that assessment is limited, it reduces the extent to which the decision-maker can rely on it as evidence that harm has been minimised through the site selection process.</p> <p>The Council therefore maintains that only limited weight should be given to the Applicant's alternatives assessment in the overall planning balance.</p>
2.8	4.2.17 & 4.2.18	<p>Comment that the Applicant's description of the Site being 'relatively flat with a gently undulating topography' is not supported by local evidence.</p> <p>Instead, Buckinghamshire Council considers there to be gentle to moderate landscape undulation with clear variations across parcels. Further comment that Buckinghamshire Council considers this difference in description materially affects assessments of visual exposure. An example is provided in Paragraph 4.2.18 of the LIR.</p>	<p>The Applicant would like to clarify that the text quoted by the Council at Paragraph 5.2.1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] directly refers to the local landscape surrounding the National Grid East Claydon Substation, rather than the wider Site as misinterpreted by the Council. ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045] notes that Parcel 1 and 1a are considered gently undulating with the highest point being Knowl Hill around 116m above ordnance datum and notes the difference in topography across the parcels of land. This is also supported by the Topography Plan which is provided in ES Volume 3, Figure 2.3: Topography Plan [EN010158/APP/6.3] [AS-020] which has informed the assessments within the Environmental Statement, including the landscape and visual assessment detailed in Assessment detailed in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].</p>	<p>The Council welcomes clarification that the topography across the overall site is varied. The Council considers this has an influence the effect of the proposal on the landscape and the extent to which the development can be effectively mitigated.</p>
2.9	4.2.19	<p>Comment that BESS in this location would appear incongruous when compared to solar arrays which sit low in the landscape and can be partially absorbed by landform. Comment that BESS introduces substantial massing and associated infrastructure</p>	<p>Whilst the Applicant recognises that there would be a height difference between the solar arrays and the BESS, with the solar PV modules no greater than 3.5m above ground level (AGL) (post-earthworks) in Parcel 2 and the BESS compound no greater than 6m AGL (post-earthworks), the proposed location of the BESS reduces the BESS's prominence on the skyline when compared to if the BESS were to be located in the flatter Parcel 3. These heights are secured in the Design Commitments [EN010158/APP/5.9.4]. Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape, with higher landform behind it, when viewed from the east and south. Other factors that have led to the location of the BESS within Parcel 2, which include, but are not limited to, consideration of space requirements for the BESS, impacts on tenants and businesses, noise, flood risk, heritage and residential visual amenity, are detailed</p>	<p>The BESS would still introduce substantial built form and massing, materially greater than the surrounding solar arrays, and the distinction is not limited to overall height but to the perception of large, vertical infrastructure. In addition, there is insufficient clarity regarding the scale, extent and final levels of the proposed earthworks. Whilst the Applicant suggests that landform will assist in reducing prominence, the reference to finished heights of up to 6m post-earthworks indicates that the BESS would remain a visually prominent and potentially stark feature. Without clear evidence on.</p> <p>The Council therefore maintains its position that the BESS would appear</p>

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			further in Section 5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Appendix 2 to this document.	incongruous and would introduce a degree of visual prominence not comparable to the solar arrays.
2.10	4.2.19	The BESS would include tall close-boarded acoustic fencing which would be wholly out of keeping with the rural typology in the area. Further comment that the fencing would appear stark in mid- to long-distance views.	As secured in the Design Commitments [EN010158/APP/5.9.4] , the acoustic fencing would be no greater than 3.5m AGL (post-earthworks). This is the same maximum height as the solar PV modules. The design of the acoustic barriers, which may not be close-boarded acoustic fencing, will be finalised during the detailed design stage once the noise levels of the final equipment choices are known. As set out on pages 79 and 80 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] , there are various material options that can be adopted for the acoustic barriers. The specification of any acoustic mitigation scheme would be provided prior to operation and is secured by a requirement of the Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.3] , (Section 2.8). The visual impact of the acoustic barrier is considered on pages 176-178 of the ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] . Its impacts will primarily be localised due to its scale being similar to the solar PV modules and smaller than the BESS.	<p>The BESS and associated barriers would introduce engineered features and more prominent, vertical and enclosing features within an otherwise open rural landscape. The Council does not agree that these effects would be localised.</p> <p>Reliance on planting does not overcome this concern. Screening would not fully mitigate the perception of mass or enclosure. As a result, the infrastructure would remain conspicuous within the landscape.</p> <p>The Council therefore maintains that the BESS is not appropriately located and would give rise to effects that cannot be adequately mitigated through design or planting.</p>
2.11	4.2.20	Comment that BESS would introduce operational noise, including transformer hum, and intermittent night-time activity. Further comment that BESS would erode the tranquillity along the Bernwood Jubilee Way, thus diminishing recreational amenity.	<p>During the operation (including maintenance) phase, noise from equipment installations associated with the Proposed Development would be heavily mitigated, including use of low-noise units and acoustic barriers as set out and secured in the Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.3] and Design Commitments [EN010158/APP/5.9.4]. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and Public Right of Way (PRoW) network. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse effects would not be expected as set out in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].</p> <p>ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] has considered the potential contribution of noise effects on recreational amenity and it is considered that the limited and not significant levels of effect ascribed to noise impacts would not further increase the levels of effect on footpath users in the Order Limits.</p>	<p>The Council does not agree that effects would be negligible on the basis that users are transient. In practice, receptors may pause, dwell or move slowly through this part of the network, and the perception of noise and associated infrastructure is likely to be more pronounced. That is particularly so where noise is experienced along reasonably lengthy parts of the network.</p> <p>Furthermore, the proposed mitigation, including acoustic barriers and planting, does not in the Council's view overcome this issue. The infrastructure would remain perceptible both visually and in terms of its noise impact reinforcing the sense of an engineered environment rather than a rural one. Therefore, adverse effects would be experienced.</p>

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2.12	4.2.21	<p>Comment that the Applicant's Site Selection Report does not demonstrate that flatter, more visually contained or less sensitive land within or beyond the search area was unavailable or unsuitable.</p>	<p>As noted within the Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]), the Applicant established a Search Area which extended up to 10km from the National Grid East Claydon Substation. The Search Area was defined and restricted by the commercial viability of the project, considering the capacity, distance from the grid connection, underground cable costs, capital costs and market conditions at the time. Therefore, land beyond the Search Area would not be suitable.</p> <p>As set out in NPS EN-1 (2023) paragraph 4.3.24, a proposed project does not have to demonstrate that it is the best option, but rather that it is acceptable under the provision of the relevant policy. Further, NPS EN-1 (2023) paragraph 4.3.9 states that 'this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective'.</p> <p>The Site Selection Report (Appendix 1 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) confirms that the Applicant sought to avoid areas of particular environmental and landscape sensitivity when identifying suitable land within the Search Area. The Applicant's efforts in avoiding areas of particular environmental and landscape sensitivity were weighed against a wider range of considerations which generally sought to identify land as close to the point of connection as possible, in order to minimise the risks of environmental impacts, disruption to multiple landowners, challenges with crossings and process losses, and the cost and delay of a longer cable route.</p>	<p>Reliance on NPS EN-1 paragraphs 4.3.9 and 4.3.24 does not address this concern. The Council accepts that there is no requirement to demonstrate that the Proposed Development represents the 'best' option; however, the policy framework does not displace the need for a proportionate and transparent site selection process which meaningfully engages with environmental and landscape constraints. In this case, the evidence does not demonstrate that land of lower sensitivity whether within or beyond the defined Search Area has been tested.</p>

Table 3-3: Biodiversity and Ecology

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Adequacy of the Assessments and Surveys				
3.1	4.3.1	<p>Comment that the Council has concerns about the adequacy of surveys and that datasets are outdated. Further comment raising concern with the fragmentation of ecological networks, hedgerow and habitat loss and insufficient arboricultural baseline evidence.</p>	<p>The Applicant notes that this comment is not accurate as the CIEEM guidance note¹ on the age and validity of ecological survey data does not simply impose a blanket two year validity window, it's more nuanced than this and depends upon a number of factors including if there has been any significant material change to on-site conditions, noting that it must be recognised that any survey work forms a snapshot in time. As detailed within the Applicant's response to Buckinghamshire Council's [RR-026] in the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant considers that the ecological survey effort and data set is adequate to inform a complete and detailed assessment that fully considers impacts of the Proposed Development on the relevant ecological receptors as provided within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].</p> <p>The Proposed Development has been designed to ensure the retention and protection of habitats that are considered to be of higher value to biodiversity including woodland, ponds, watercourses, ditches and the majority of hedgerows and arable field margins, with loss of hedgerows and individual trees kept to a minimum where practicable, with re-instatement of hedgerows undertaken in the majority of cases. The vast majority of infrastructure is proposed to be sited on arable fields or low value grassland pasture fields which are of limited value to biodiversity in comparison to retained habitats of higher value, with infrastructure located to avoid more ecologically sensitive areas. Mitigation planting includes the creation and enhancement of extensive areas of grassland, hedgerows, arable margins, ponds and scrub and tree planting that has been designed to create a coherent ecological network to link the Site to the wider landscape, ensuring the Site will continue to support a range of species, which is detailed and secured by the Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO</p>	<p>Ecology: Buckinghamshire Council discussed this with the applicant and agreed that surveys to inform final mitigation within the CEMP and oLEMP were sufficient to ensure updated surveys are undertaken to ensure no harm to species excluding bats.</p> <p>The Council does not agree that its concerns regarding fragmentation relating to ecological networks. This concern relates to concerns relating to insufficient buffers (See LIR para 4.3.2)</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>[EN010158/APP/3.1.4]).</p> <p>All arboricultural data informing the assessment has been verified and collected on site by a suitably qualified arboricultural consultant in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction ('BS 5837:2012') and as detailed within ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The arboricultural baseline is therefore considered sufficient to support the assessment of the Proposed Development.</p>	
3.4	4.3.55, 4.3.56, 4.3.57 and 4.3.58	<p>Comment noting that ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] [REP1-036] ('the Biodiversity Chapter') identifies residual effects from the Proposed Development on Bechstein's Bat (roosting, foraging, and commuting) as being potentially adverse, long-term, permanent (for the duration of operation) and potentially significant at the district level but that the Chapter concludes this potentially significant effect as not equating to 'significant harm'. Further comment that the Applicant has been unable to conclude whether effects are likely to be significant or not and that Buckinghamshire Council considers the effect to be significant on the Bechstein's Bat population at the national level.</p>	<p>As detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 18) with due consideration to the status of the Bernwood Bechstein's bat population and the assessment of its National importance, a precautionary approach has been applied and the residual effects of the operation (including maintenance) of the Proposed Development are assessed as potentially being adverse, long-term and permanent for the duration of the operation (including maintenance) phase, in light of Bechstein's bat lifespans, and therefore potentially significant at the District level. It is considered that this potentially significant effect would not amount to, nor equate to, 'significant harm' as the predicted impacts will be of a scale that will not impact the overall favourable conservation status of the species as the Proposed Development design and mitigation has focused on protecting and enhancing Bechstein's bat foraging and commuting habitat.</p> <p>A detrimental effect of solar farms has been suggested for some bat species, but the studies that have concluded this are short-term and the evidence limited; there are no longitudinal (ie. before /after) studies of effects on well-designed well-managed established solar farms. Nonetheless, the assessment of 'potentially significant' has been applied on a precautionary basis because the mechanism by which any such effect might manifest is uncertain. However, given the mitigation in place, it is hard to conceive of an effect that would result in significant detriment sufficient to conflict with strategies for nature recovery</p>	Please refer to response to ExA questions on this topic.

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3.5	4.3.61	<p>Comment that notes disagreement with the Biodiversity Chapter's conclusion that the predicted impacts of the Proposed Development would not be of a scale that would impact the favourable conservation status (FCS) of Bechstein's bat. Further comment that the Bernwood population of Bechstein's bat is estimated to comprise 1.4% of the UK population and that any extinction of this population would lead to a reduction in the FCS of the species and that this would therefore be considered to be significant harm by Natural England's definition.</p>	<p>Extinction of a local population would indeed impact on FCS but this outcome is neither predicted nor likely, as outlined above in response to point 3.4. Woodlands are being retained/protected, commuting corridors (flightlines) are being strengthened/buffered and foraging opportunities are being improved as part of the Proposed Development, which is detailed and secured by the Outline LEMP [EN010158/APP/7.6.3].</p>	<p>Bechstein's bats are not at Favourable Conservation Status. Any action which impacts the objective of achieving FCS should be considered significant harm.</p> <p>Direct impact to woodlands (but not trees and hedgerows) has been avoided, however we still assert that the buffers to woodland provided to mitigate impacts are not sufficiently wide in all cases.</p> <p>Commuting corridors are being impacted via the direct removal of sections of hedgerows. The hedgerow buffers proposed as mitigation are not sufficient and should be measured from the edge of the feature not the centre. The security fence will act as a barrier to bats decreasing the likelihood that the 4m of grassland between the panels and fence would be used. As it is unknown what exact quality of solar panels displaces bats it is uncertain how bats would react to panels alongside commuting routes.</p> <p>Access to drinking water (ponds) has not been assessed.</p> <p>The likelihood of displacement resulting from noise and lighting from both construction phases and operation has been assessed but not in cumulation with other impacts on commuting routes, such as the removal of sections of hedgerow.</p> <p>There is a direct loss of grazed pasture available for foraging bats within their home range, via the placement of panels. This has been compensated for via the proposed creation of alternative grassland, but no quantitative assessment of how much further this resource is from known roosts has been provided.</p> <p>It is too early to have an understanding of the impact on the bat population from HS2 as monitoring is ongoing.</p>
3.6	4.3.62	<p>Comment that just because an assessment concludes a potentially significant effect at the district level which would not equate to significant harm at the species level, this should not detract from the significance of the local impact. Further comment that there is only one other known breeding population of Bechstein's bats at the County level and as such extinction at this level would be significant.</p>	<p>Extinction of a local population would indeed impact on FCS but this outcome is neither predicted nor likely, as outlined above in response to point 3.4. Woodlands are being retained/protected, commuting corridors (flightlines) are being strengthened/buffered and foraging opportunities are being improved as part of the Proposed Development, which is detailed and secured by the Outline LEMP [EN010158/APP/7.6.3].</p>	<p>We do not agree that there will be a positive outcome for bats resulting from this Scheme.</p>
3.9	4.3.70 and 4.3.71	<p>Comment that significant numbers of ground nesting birds have been identified on Site and that location(s) of compensation site(s) will be required and an accompanying survey will need to be undertaken on those site(s) to understand existing usage. Further comment that only panelled areas (not temporary impacts, such as cabling routes) have been assessed, and so insufficient evidence has been provided to assess the impact of the Proposed Development on ground nesting birds.</p>	<p>It is correct that only Solar PV panel areas have been subject to breeding bird surveys. However, as outlined in ES Volume 4, Appendix 7.4: Breeding Bird Survey Report (2022) (Confidential) [EN010158/APP/6.4] [APP-090] and ES Volume 4, Appendix 7.12: Breeding Bird Survey Report (2024) (Confidential) [EN010158/APP/6.4] [APP-098], a significant area has been subject to breeding bird surveys over 2 survey periods (2021/2022 and 2023/2024) and as the cable route and other areas support identical habitat to areas that have been subject to breeding bird surveys, the</p>	<p>We have now agreed with the approach being taken following updates to the oLEMP and oCEMP. However, this is subject to the point reserved in the post-hearing note on ISH1.</p>

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			<p>Applicant is confident that it can predict the likely usage of the cable route corridor and other areas by breeding birds (including ground nesting birds). Due to the temporary nature of the cabling works no significant effects are envisaged as land would be returned to agricultural use and could be continued to be utilised by breeding birds as currently used. The Outline LEMP [EN010158/APP/7.6.3] secures a commitment to undertaking cabling works outside of the breeding bird season or failing this subjecting these areas to nesting bird checks to ensure legislative compliance with regards to nesting birds. Finally, as detailed within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], (see response to [RR-020] at page 288) the Outline LEMP [EN010158/APP/7.6.3] outlines a suite of mitigation measures designed to benefit ground nesting birds along with a monitoring programme which would be secured by the Requirement 7 of the Draft DCO [EN010158/APP/3.1.4].</p>	
3.10	4.3.72	<p>Comment that further assessment of the numbers of ground nesting birds that will be displaced are required alongside a mitigation plan which provides replacement habitat at a 2:1 ratio.</p>	<p>The Applicant does not agree that additional assessment of the number of ground nesting birds that may be impacted by the Proposed Development is required or that mitigation at a ratio of 2:1 for habitat loss is required - instead, the mitigation requirement has been based on the number of birds observed during surveys. As presented in the Outline LEMP [EN010158/APP/7.6.3] at paragraphs 4.5.22 to 4.5.25 it is estimated that there were 67 skylark territories (used as a proxy for all ground nesting species) across the area subject to breeding bird surveys (473 ha). However, since breeding bird surveys were undertaken, the design of the Proposed Development has reduced substantially so that the actual area where ground nesting birds may be displaced by solar PV panels is only 279ha and it is estimated that this area supports 39 breeding pairs. Therefore, mitigation is based on the appropriate and proportionate requirement to mitigate for 39 breeding pairs. It is considered that with appropriate management the carrying capacity of the areas set aside for ground nesting bird mitigation (95ha) would support a greater carrying capacity of nesting pairs than the current arable farmland. Finally, as indicated in the Outline LEMP [EN010158/APP/7.6.3] provision of ground nesting habitat is only one of a suite of measures designed to benefit nesting birds which include increasing the availability of insect prey during the summer months as well as provision of a source of winter seed. The Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-020] at page 288) indicates that with</p>	<p>We have now agreed with the approach being taken following updates to the oLEMP and oCEMP.</p>

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			appropriate management solar farms can continue to support a diverse range of breeding bird species.	
3.11	4.3.73	Comment that a monitoring programme is required due to the significance of the breeding birds identified on the Site and the measures proposed to maintain and enhance habitat for these species. Further comment that the Outline LEMP only proposes ground nesting bird monitoring. Final comment that a wider farmland bird monitoring programme to inform on the habitat enhancement and creation measures' success is expected.	The mitigation measures proposed include retention of woodland, the majority of hedgerows and associated buffers to benefit other non-ground nesting species. The Applicant considers that monitoring for breeding bird species would include all farmland bird species not just ground nesting ones and notes that the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] , (see response to [RR-026] at page 30) indicates that the final monitoring programme within the Outline LEMP [EN010158/APP/7.6.3] would include wintering and breeding birds and would be submitted to and approved by the relevant planning authority (in consultation with the and Natural England. This commitment is secured by Requirement 7 of the draft DCO [EN010158/APP/3.1.4] . However, the Outline LEMP [EN010158/APP/7.6.3] will be updated at Deadline 2 to further clarify this position.	Likely resolved on receipt of the updated oLEMP which the Council will review when it becomes available.
3.13	4.3.79, 4.3.80 and 4.3.81	Comment that the Local Nature Recovery Strategies (LNRS) are core to achieving Goal 1 of the Environmental Improvement Plan (EIP) and that the key measures within the published Buckinghamshire and Milton Keynes LNRS are M122, M120, M110 and M1	<p>The Applicant is fully aware of the importance of the LNRS. Mitigation planting is detailed in the Outline LEMP [EN010158/APP/7.6.3] (and secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]) and includes the creation and enhancement of habitats, where appropriate, in line with the LNRS in order to achieve Goal 1 of the Environmental Improvement Plan (EIP.) This includes the following:</p> <ul style="list-style-type: none"> • <i>M122: Take action to restore populations of blackthorn butterflies and moths</i> – the design of the Proposed Development has ensured that habitats most likely to support populations of black and brown hairstreak butterflies and moths (blackthorn scrub in woodland and hedgerows) have been mostly retained (in relation to hedgerows and individual trees) or fully retained (in relation to ancient woodland). New hedgerow planting and new scrub planting is proposed, including hedgerows that will be planted and enhanced ahead of construction works commencing. Improvement to existing hedgerows will also be undertaken by bolstering any gaps with a diversity of appropriate native species including Blackthorn where required. Management of woodland, hedgerows and scrub habitat that contain Blackthorn would be undertaken in such a manner to ensure the 	<p>Care should be taken not to confuse avoidance and mitigation measures to avoid impacts to existing features with opportunities for enhancement and natures recovery.</p> <p>The CIEEM guidelines for Ecological Impact Assessments define:</p> <p><i>Mitigation - Negative effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation.</i></p> <p><i>Compensation - Where there are significant residual negative ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.</i></p> <p><i>Enhancement - Seek to provide net benefits for biodiversity over and above requirements for avoidance, mitigation or compensation.</i></p>

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			<p>Blackthorn resource is maintained.</p> <ul style="list-style-type: none"> • <i>M120: Take action to restore populations of the Duke of Burgundy butterfly</i> - the design of the Proposed Development has ensured that habitats most likely to support populations of the Duke of Burgundy butterfly within the vicinity of the Order Limits (ancient woodland) are fully retained and appropriate buffers implemented. • <i>M110: Take action in Target areas for Species Recovery. This includes Bechstein's bat as well as other bat species</i> – Given the sensitivity of the location of the Proposed Development, particularly for commuting and foraging bats, the layout of the Proposed Development and embedded design principles have been deliberately designed to include bespoke mitigation measures in areas where higher bat activity has been recorded and areas that have been flagged as key for Bechstein's bat focused on the retention, creation and enhancement of habitats. The locations of mitigation areas have been chosen to ensure connections between the existing SSSIs, and ancient woodland adjacent to the Site would be enhanced to create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. • <i>M1: Buffer and connect ancient woodlands, while preserving and enhancing other Priority Habitats such as chalk grassland, floodplain meadows</i> - 30m buffers with an additional 5m from solar panels to the security fence are proposed from all ancient woodland. Further, a minimum 10m buffer with an additional 5m from solar panels to the security fence from all hedgerows is proposed linking the blocks of woodland with habitat creation and enhancement proposed within the buffer areas to ensure connectivity is maintained between the woodland blocks and to the wider landscape. No areas of chalk grassland or floodplain meadows have been recorded within or adjacent to the Order Limits. <p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises and provides assessment of the Proposed Development against Paragraph 5.4.34 of NPS EN-1 (2023) through Appendix 4 (Policy Compliance Assessment Tables).</p>	

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			<p>Paragraph 5.4.34 of NPS EN-1 (2023) specifically recognises that projects should consider and provide advances on the opportunities identified through LNRS. As mentioned above, and in Appendix 4 to the Planning Statement [EN010158/APP/5.7.3] [REP1-016], Goal 1 of the EIP and the key measures within the Buckinghamshire and Milton Keynes LNRS are supported.</p>	
3.19	4.3.94	<p>Comment that arboricultural effects warrant distinct consideration from the Biodiversity Chapter given the Proposed Development's scale and the presence of Ancient Woodland, veteran and mature trees, and an extensive hedgerow network. Further comment that trees and woodland provide other services such as contributions to landscape character, cultural and historic value, soil stability, water regulation, and climate resilience.</p>	<p>The Applicant acknowledges that arboricultural features provide a range of functions beyond biodiversity, including contributions to landscape character, cultural and historic value, soil stability, water regulation, and climate resilience. The Applicant considers that arboricultural effects have been appropriately and robustly considered within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and ES Volume 4 Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4]. Arboriculture and ecology necessarily overlap on a scheme of this nature, particularly in relation to woodland edges, hedgerows, buffers and habitat interfaces. There is nothing inherently inappropriate in presenting these topics together. Accordingly, arboricultural effects have been given appropriate and proportionate consideration, both as a standalone topic and in conjunction with related environmental disciplines. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies tree groups and woodland belts as key structural landscape features, supported through the application of BS 5837:2012 category sub-classifications, including the '2' category (landscape value). This explicitly recognises the contribution of trees and groups to landscape character and visual amenity, alongside their arboricultural value.</p> <p>As set out within the Outline LEMP [EN010158/APP/7.6.3] the Proposed Development has been designed to retain and reinforce these functions, rather than diminish them. As set out in the Environmental Statement, "new structural planting, in the form of tree belts and hedgerows, will help to soften and screen built development and integrate it into the existing landscape, whilst also providing habitat for biodiversity. Planting will be designed and managed to complement the existing vegetation mix, structure and pattern of the landscape". This approach is informed by the Buckinghamshire & Milton Keynes Biodiversity Action Plan and wider landscape character studies, promoting native species planting, strengthening of hedgerows, and the addition of new hedgerow trees and woodland belts.</p> <p>The Proposed Development will therefore deliver:</p>	<p>The Applicant's response is noted. The Council's earlier point was that arboricultural effects also extend beyond biodiversity and therefore require sufficient clarity as a distinct consideration within the overall assessment and mitigation framework. No further arboricultural comments are made on this point.</p>

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			<ul style="list-style-type: none"> • Enhanced landscape structure and green infrastructure corridors, improving connectivity across the Site; • Retention and reinforcement of existing hedgerows and woodland features, maintaining their functional and cultural role; • Planting within Parcel 1 will respect the 'designed' character of the woodland blocks to the wider historic landscape of Claydon House; and <p>Additional planting and long-term management, ensuring resilience and continuity of arboricultural features.</p>	
3.20	4.3.100, 4.3.101 and 4.3.102	<p>Comment noting that the Applicant had confirmed that aerial (drone) survey information was used to inform the Arboricultural Impact Assessment and that this was intended to complement, rather than replace, ground-based survey work but that the Applicant has not explicitly confirmed that all data used has been comprehensively verified through ground-based survey on Site. Further comment recognising the benefits of aerial survey information in assisting assessments but that aerial survey information is not to be used reliably for full identification of relevant arboricultural parameters.</p>	<p>As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 42), the Applicant confirms that aerial (drone) survey data was utilised to inform the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] as a supporting tool for base mapping and spatial referencing. However, it is important to clarify that this data was not relied upon in isolation, nor was it intended to replace a BS 5837:2012 compliant field survey.</p> <p>All arboricultural data used within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has been comprehensively verified through ground-based survey undertaken on Site by a suitably qualified arboricultural consultant as stated within Section 3.1.1, 3.6.2 and Annex C of the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. This included direct inspection of trees and hedgerows, measurement of key parameters (including but not limited to stem diameter, height, crown spread, and physiological and structural condition), and categorisation in accordance with BS 5837:2012. In relation to paragraph 4.3.99, the Applicant acknowledges that woodland parcels and woodland edges, including Ancient Woodland, are sensitive receptors; however, it is not agreed that the Site as a whole should be characterised as having a uniformly high arboricultural sensitivity. As set out within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] the Site is predominantly agricultural land with trees largely confined to hedgerows, field boundaries and woodland blocks, resulting in a variable arboricultural baseline. Sensitivity is therefore feature-</p>	<p>The Applicant's response is noted. The Council is not suggesting that the arboricultural survey was undertaken without appropriate professional input or without reference to BS5837:2012. However, the earlier point was not limited to survey methodology in principle, but also to the degree of confidence that can be placed in the baseline where access or visibility may have been constrained in practice. In that context, it would still be helpful to understand more clearly where any restricted access or limited visibility occurred, which features were affected, and whether those locations coincide with retained trees, woodland edges, hedgerows, veteran trees or proposed works areas. This would assist in providing confidence that the baseline is sufficiently robust for the purposes of impact identification, buffering and the later protection strategy.</p>

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			<p>specific, with higher value attributed to elements such as Ancient Woodland and veteran trees, rather than the Site as a whole. Potential indirect impacts, such as those arising from construction activity or operational pressures, have been identified and addressed through embedded design measures and secured controls. Accordingly, whilst specific features within the Site are recognised as sensitive, the Applicant considers that this sensitivity has been appropriately reflected in the design and mitigation strategy, and that woodland edge effects are effectively avoided or minimised.</p>	
3.21	4.3.103	<p>Comment noting that the Applicant has not always clearly or consistently classified woodland areas as being either groups of trees or woodland parcels. Further comment noting that this has implications for the assessment of woodland edge effect, buffer provision and the assessment of construction and operational effects.</p>	<p>As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 42), the tree data table within Annex A of ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] notes which groups are woodland parcels and which are ancient semi-natural woodland. The approach to classification within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has been undertaken in accordance with BS 5837:2012, which allows for the application of professional judgement in distinguishing between individual trees, groups, and woodland units based on site-specific characteristics. Appendix 3: Vegetation Removal Parameters of the Outline LEMP [EN010158/APP/7.6.3] sets out minimum buffer distances from edges of existing woodlands including groups, using National Forest Inventory 2021 data. These buffers are applied to the associated woodland features regardless of BS5837 prefixes.</p> <p>Accordingly, the Applicant considers that woodland edge effects, buffer provision and construction and operational effects have been appropriately and robustly assessed and considered in the ES.</p>	<p>The Applicant's response is noted. It is helpful that the intended approach to woodland-related buffers is explained more clearly. However, it would still be helpful for features functioning as woodland systems to be more clearly and consistently identifiable in the assessment material, so that the treatment of woodland edge effects, buffer application and related construction and operational effects can be followed with greater confidence.</p>
3.22	4.3.104	<p>Overarching comment that, notwithstanding further clarification from the Applicant, the current Arboricultural Impact Assessment does not provide a sufficiently robust baseline to assess the impacts of all phases of the Proposed Development.</p>	<p>The Applicant disagrees with this comment. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies and evaluates impacts arising from construction, access and highway works, and operational phases, including tree and hedgerow removals, pruning requirements, and potential Root Protection Area (RPA) incursions. The level of detail provided is robust and proportionate to the current stage of design within the DCO process. Once further refinement of layout and construction methodologies are provided at the detailed design stage the need for a site specific Arboricultural Method Statement will</p>	<p>The Applicant's response is noted. Please see response to 3.20</p>

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			<p>be required, which is set out in the Outline CEMP [EN010158/APP/7.2] [APP-138] and secured by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].</p>	
3.23	4.3.105	<p>Comment recognising that buffer distances and proposed points of access and infrastructure layouts are informed by the baseline established within the Arboricultural Impact Assessment and so the accuracy of this is fundamental to the accuracy of identifying impacts and effective avoidance and mitigation measures.</p>	<p>The Applicant agrees that the arboricultural baseline is fundamental to informing buffer distances, access routes, and infrastructure layout. As demonstrated within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] the baseline has been established through site-verified survey undertaken in accordance with BS 5837:2012, and has directly informed the design evolution of the Proposed Development and set appropriate offsets from arboricultural features.</p>	<p>The Applicant's response is noted. Please see response to 3.20.</p>
3.24	4.3.109	<p>Comment that the full arboricultural impact has not always been clearly defined, particularly where elements of the Proposed Development are described in outline or where there are construction activities proposed within buffer zones or in proximity to hedgerows and trees. Further comment that such encroachment into protection and buffer zones reflects a direct impact on retained arboricultural features.</p>	<p>The Applicant considers that ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2] clearly identifies and describes potential impacts on retained trees, hedgerows and groups, including direct losses, pruning requirements, and potential incursions into RPAs associated with construction, access and infrastructure works.</p> <p>The assessment adopts a reasonable worst-case approach, ensuring that all likely impacts, including those arising from proximity to retained features or within buffer zones, are appropriately considered at this stage. Encroachment within RPAs has detailed within Section 5.3 of ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2], page 33.</p> <p>The Applicant acknowledges that over a 40-year operational period, future tree growth and crown expansion have the potential to interact with infrastructure. However, it is not agreed that this gives rise to a material risk of incremental degradation of arboricultural value. The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase. These documents have been updated to state: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified". This</p>	<p>The Applicant's response is noted. It is helpful that the Applicant identifies a reasonable worst-case approach. However, where construction activities, access works or infrastructure are shown in proximity to retained arboricultural features, or within areas intended to function as buffers or protection zones, it would still be helpful for the means by which those interactions are to be avoided or controlled to be more clearly apparent at outline stage. This is particularly relevant where the current plans indicate potential RPA impacts alongside protective fencing.</p>

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			inspection regime ensures that tree growth, condition, and any potential conflicts are proactively monitored and managed, allowing for early intervention where necessary. Any management, including pruning, will be undertaken in accordance with good arboricultural practice (e.g. BS 3998:2010- Tree work – Recommendations) and will be proportionate, avoiding unnecessary or harmful intervention.	
3.25	4.3.111 and 4.3.137	Comment that the Applicant has provided limited information on arboriculture with regard for the decommissioning of the Proposed Development. Further comment that this phase may include excavation and the reestablishment of points of access and that it is currently uncertain how impacts on RPAs and sensitive arboricultural features would be avoided.	The Applicant acknowledges that detailed decommissioning methodology is not defined at this stage. However, appropriate and proportionate mitigation measures to avoid damage to retained trees and hedgerows during decommissioning are embedded within the Outline DEMP [EN010158/APP/7.4.3] . Furthermore, impacts to trees and RPAs will be managed through a detailed Decommissioning Environmental Management Plan, which will be agreed with the relevant planning authority prior to the decommissioning phase (as secured by Requirement 18 of the Draft DCO [EN010158/APP/3.1.4]). This will ensure that any works within buffer areas or in proximity to retained arboricultural features are properly controlled, supervised, and mitigated.	The Applicant's response is noted. No further arboricultural comments are made on this point at this stage.
3.26	4.3.120	Comment noting that proposed accesses and highway works, including road widening in specific locations, have the potential to encroach into the root protection areas (RPAs) of retained trees. Further comment noting inconsistencies between the Arboricultural Impact Assessment and the Outline CTMP.	The Applicant acknowledges the Council's comments regarding potential encroachment into RPAs associated with access and highway works, and the need for consistency between ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and the Outline CTMP [EN010158/APP/7.5.3] . The Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to show all impacts from highways works	The Applicant's response is noted, including the confirmation that the Annex E plans have been updated to show impacts from highway works. That clarification is helpful. It remains important, however, that the relationship between highway works, retained RPAs and the proposed protection measures can be followed clearly on the plans, particularly where those interactions are relied upon to be addressed through later detailed design and the AMS.
3.27	4.3.121	Comment noting that the Outline CTMP includes measures and requirements for works which typically require the excavation of highways verges. Further comment recognising the potential impact on RPAs and below-ground environments.	The Applicant acknowledges the Council's comments regarding potential encroachment into RPAs associated with access and highway works. However, these potential impacts have been identified and considered within ES Volume 4, Appendix 7.13 Arboricultural Impact Assessment [EN010158/APP/6.4.2] , including the relationship between highway works and retained trees. Where interactions with RPAs are identified, these are clearly defined and capable of being avoided or minimised through detailed design refinement and appropriate construction methodologies. The updates submitted at Deadline 2 will also provide further clarity and alignment between the documents.	The Applicant's response is noted. Please see response to 3.26.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
3.28	4.3.122 to 4.3.127	<p>Comment that, in a number of cases, highway-related works are not clearly shown within the Arboricultural Impact Assessment plans and the potential impacts on RPAs and arboricultural features are not explicitly assessed. Further comment noting examples is provided:</p> <ul style="list-style-type: none"> • 'Figure SK002' of the Arboricultural Impact Assessment plans shows hedgerow removal adjacent to Fields D7 and D8 but does not clearly assess impacts on adjacent trees; • 'Figure SK003' of the Arboricultural Impact Assessment plans, between Fields D44 and D45, show encroachment within the stated protection buffer of Oak T532, a veteran tree; • 'Figures SK005' and 'SK006' of the Arboricultural Impact Assessment plans show access crossings at junctions, but impacts are illustrated only on one side of the junctions, with hedgerow removal shown but not associated impacts on adjacent trees; • 'Figures SK007' to 'SK011' of the Arboricultural Impact Assessment plans show temporary highway measures. While these measures are intended to reduce impacts, they confirm that works will take place close to trees and hedgerows, with potential for soil compaction, root disturbance and additional vegetation loss that is not fully assessed within the Arboricultural Impact Assessment. <p>Further comment that, where highway works are not integrated into the Arboricultural Impact Assessment from the outset, there is a risk for impacts to be overlooked or not addressed properly.</p>	<ul style="list-style-type: none"> • In relation to comment Figure SK002 of the Outline CTMP [EN010158/APP/7.5.3], trees T546, T545 and G117 are shown for removal at this location within Tree Removal and Preliminary Protection Plan of ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] which clearly assess the effects of highway works. • In relation to comment Figure SK003 of the Outline CTMP [EN010158/APP/7.5.3]. The area shown is not a generic "protection buffer", but the veteran tree RPA for Oak T532, calculated in accordance with established guidance and best practice. The fact that the proposed road alignment lies at the edge of this RPA does not indicate any uncertainty or lack of clarity in the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and in relation to the identification of the scale and significance of potential impacts on roadside trees, hedgerows and veteran features. Rather, it transparently identifies a potential interaction between the layout and a known arboricultural constraint. The position of the tree, its dimensions, and the calculated RPA are clearly defined and robustly established within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The overlap reflects a design outcome influenced by multiple disciplines, including highways requirements, rather than any deficiency in the arboricultural baseline. It should also be noted that efforts have been made to avoid this constraint through design iteration, and further refinement remains possible at the detailed design stage to minimise or avoid impacts where practicable. Accordingly, the drawing does not demonstrate any need for further survey or verification; it simply illustrates a potential impact arising from the multidisciplinary design process, which is appropriately identified and capable of being addressed through refinement and mitigation. • In relation to Figure SK005 of the Outline CTMP 	<p>The Applicant's response is noted. The Applicant confirms that the Annex E plans have been updated to reflect highway-related pruning and related impacts more clearly, which is welcome.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>[EN010158/APP/7.5.3], T87 are shown for removal at this location within the Tree Removal and Preliminary Protection Plan of the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. In relation to Figure SK006 of the Outline CTMP [EN010158/APP/7.5.3], the crossing point of Three Points Lane was moved further south to a gap in the trees to avoid the removal of trees with bat potential and associated impacts to these trees. The Applicant confirms that Outline CTMP [EN010158/APP/7.5.3] has been updated to reflect the crossing point of Three Points Lane at Deadline 2.</p> <ul style="list-style-type: none"> • In relation to Figure SK007 of the Outline CTMP, the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] highlights in the relevant tables and within the report body (section 5.2) that T534 (ash), a section of hedge H169 and T532 (Vet Oak) may be impacted by the junction construction. In relation to Claydon Rd South the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] shows T546, 545, G117 (cat A) and parts of hedges H179 and H180 as needing to be removed either as result of highway being on top of trees or for sightline requirements. • In relation to Figure SK008 of the Outline CTMP, the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] notes that tree T668, T717 and G174 could be impacted as temporary assessing bays are required. It notes: 'Some pruning possibly required and potential for RPA impacts if highways designed passing bay is to be installed'. • In relation to Figure SK009 of the Outline CTMP, the Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to reflect the hedgerow pruning requirement. • In relation to Figure SK010 of the Outline CTMP the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and plans show section of hedge H334 as being removed. • In relation to Figure SK011 of the Outline CTMP the 	

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Applicant confirms that the Tree removal and preliminary protection plans within Annex E have been updated at Deadline 2 to reflect the pruning requirement.</p> <p>The Applicant agrees that it is important that access and highway works are fully integrated into the arboricultural assessment from the outset to ensure impacts are appropriately identified and avoided where possible. As set out within the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] impacts arising from access routes, highway works, and visibility requirements have been identified and assessed, including tree and hedgerow removals, pruning requirements, and potential RPA incursions. It is recognised that certain highway works are subject to fixed design parameters and safety requirements, which can limit flexibility. However, this does not indicate that impacts have been overlooked; rather, they have been clearly identified and transparently reported, with opportunities for further refinement at detailed design stage. The updates submitted at Deadline 2 will also address identified inconsistencies. Accordingly, ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] has robustly and proportionately assessed the impacts of temporary highway measures on arboricultural features.</p>	
3.29	4.3.133 and 4.3.134	<p>Comment stating that uncertainties that Council has identified in the Arboricultural Impact Assessment survey could risk the underestimation of indirect impacts from the Proposed Development. Further comment that indirect construction impacts may arise from repeated vehicle movements, the storage of materials and presence of construction plant material in proximity to arboricultural features.</p>	<p>As stated earlier in this table at 3.19, the Applicant does not agree that there are uncertainties in the arboricultural baseline or survey methodology that would lead to an underestimation of impacts. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is based on site-verified survey data undertaken in accordance with BS 5837:2012, and provides a robust basis for identifying both direct and indirect effects.</p> <p>Potential indirect impacts, including those arising from construction activities in proximity to retained features, have been appropriately considered within the assessment, including effects on RPAs, canopy disturbance, and diversion around RPAs where feasible.</p> <p>In relation to sensitive features such as veteran trees, Ancient Woodland edges, and hedgerows with mature boundary trees, the design incorporates precautionary buffer distances and avoidance measures, including 30 m offsets from Ancient Woodland set out within Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. No veteran trees or Ancient</p>	<p>The Applicant's response is noted. The Council's earlier comment was not limited to direct effects, but also to confidence that indirect impacts on retained vegetation can be identified and controlled in practice, particularly in the more sensitive locations. In that regard, the updated AIA is helpful. However, the practical basis for avoidance and control measures in those areas should continue to be clearly evidenced.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			Woodland are proposed for removal.	
3.30	4.3.135 and 4.3.136	<p>Comment that the decommissioning of the Proposed Development has the potential to involve works in proximity to retained trees, hedgerows and woodland edges and that limited information has been provided for as part of the DCO Application to date. Further comment that there is a lack of clarity in the decommissioning methodology with regard for arboricultural features.</p>	<p>As stated earlier in this table (Row 3.24), detailed decommissioning methodology is not defined at this stage. However, appropriate and proportionate mitigation measures to avoid damage to retained trees and hedgerows at decommissioning is detailed within the Outline DEMP [EN010158/APP/7.4.3]. Furthermore, impacts to trees and RPAs will be managed through a detailed Decommissioning Environmental Management Plan, which will be agreed with the relevant planning authority prior to the decommissioning phase (as secured by Requirement 18 of the Draft DCO [EN010158/APP/3.1.4]). This will ensure that any works within buffer areas or in proximity to retained arboricultural features are properly controlled, supervised, and mitigated.</p>	<p>The Applicant's response is noted. Please see response to 3.25.</p>
3.31	4.3.147 and 4.3.148	<p>Comment noting that a number of matters relevant to arboricultural protection are fundamental to the assessment of the impacts of the works themselves, rather than solely to construction management. Further comment that the approach to access routes, cabling, drainage features, highway works, temporary construction compounds and decommissioning activities directly influences whether impacts on trees, hedgerows and woodland can be avoided and whether proposed buffers can function as intended.</p> <p>Further comment that the reliance on the later-stage approval of a detailed CEMP does not provide sufficient certainty to inform the assessment of arboricultural effects.</p>	<p>The Applicant acknowledges that elements such as access routes, cabling, drainage, highway works, construction compounds and decommissioning activities are integral to the assessment of arboricultural effects. Throughout the design development process, trees, hedgerows and woodland features have been treated as key constraints, with the layout iteratively refined to avoid and minimise impacts wherever practicable. This includes the retention of the majority of arboricultural features, the application of buffers and stand-offs, and the avoidance of sensitive receptors such as veteran trees and Ancient Woodland. A reasonable worst-case scenario has been applied and assessed in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] to ensure that potential impacts are appropriately captured and that each of these elements is robustly considered. The role of subsequent detailed management plans (e.g. detailed Arboricultural Method Statement, detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan.) is not to defer assessment, but to secure the detailed implementation of mitigation and protection measures already identified.</p>	<p>The Applicant's response is noted. Please see responses to 3.24 and 3.26.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>The further information provided in the detailed management plans will be agreed with the relevant planning authority prior to the relevant phase of works.</p>	
3.32	4.3.148 and 4.3.149	<p>Comment requesting that an Outline Arboricultural Method Statement is developed to establish the principles under which relevant works would commence in arboriculturally sensitive locations.</p> <p>Further comment requesting that such an Outline Arboricultural Method Statement details how impacts on trees, hedgerows and woodland would be avoided or minimised. Further comment that an Outline Arboricultural Method Statement should provide clarity on the approach to access routes, temporary construction compounds and works associated with decommissioning, insofar as these are relevant to understanding arboricultural impacts.</p>	<p>An Arboricultural Method Statement (AMS) will be prepared following detailed design, prior to any construction works as set out and secured in Paragraph 1.1.13 and Table 3.2 of the Outline CEMP [EN010158/APP/7.2.3] and by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4]. At this stage, the preparation of an outline AMS would not add material value, as the final layout, construction methodologies, and working areas are not yet fixed. An outline document would therefore be necessarily high-level and largely reiterate the embedded mitigation measures already secured, without providing meaningful additional detail. The approach taken securing a detailed, site-specific AMS post-detailed design is standard practice and ensures that the final document is accurate, effective, and tailored to the confirmed construction parameters. The AMS will set out detailed measures to protect trees and will define how impacts on trees, hedgerows and woodland are to be avoided, minimised and managed during construction, including specific methodologies for access routes, temporary construction compounds and works in proximity to retained features. These would be substantially in accordance with the measures that are already set out within Table 3.2 of the Outline CEMP [EN010158/APP/7.2.3] and secured within the Design Commitments [EN010158/APP/5.9.4]. This includes defined protective measures such as tree protection fencing, no-construction zones, controlled working methods, and appropriate timing of operations to safeguard retained trees and their Root Protection Areas. Where required, minor pruning or vegetation clearance will be undertaken in advance by a qualified arborist in accordance with BS 3998:2010, ensuring that works are proportionate and appropriately managed. All site personnel will receive site-specific inductions on tree protection, supported by strict procedures to prevent soil compaction, contamination, and accidental damage, including controls on storage, drainage, and spill management in proximity to retained trees.</p>	<p>The Applicant's response is noted. It is helpful that the intended scope of the later AMS is described more clearly, and that the updated CEMP/LEMP framework is clearer on some of the measures to be secured. However, the preference for an Outline AMS, or equivalent outline-stage arboricultural method clarity, is unchanged, as this would assist in providing confidence that the proposed mitigation and protection strategy can be delivered in practice in arboriculturally sensitive locations.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
3.33	4.3.150	Comment recognising that the development of an Outline Arboricultural Method Statement would not be expected to resolve all construction details in advance of consent, though it is considered necessary to demonstrate that the proposed mitigation strategy is capable of being delivered in practice and that arboricultural impacts have been adequately assessed at this stage.	Please see response above.	The Applicant's response is noted. Please see response to 3.32.
3.34	4.3.158 to 4.3.163	Comment that, for the reasons given in Section 4.3 of the LIR, the uncertainties identified in relation to survey accuracy, buffer adequacy, protection of veteran and future veteran trees, impacts arising from access and highway works, and the long-term management of retained arboricultural features and cumulative pressures mean that it has not yet been demonstrated that arboricultural impacts have been avoided or mitigated to a degree consistent with national policy expectations. Further comment that proposed mitigation does not fully align with VALP Policy NE8.	<p>As stated earlier in this table at 3.19, the Applicant does not agree that there are uncertainties in the arboricultural baseline or survey methodology that would lead to an underestimation of impacts. ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is based on site-verified survey data undertaken in accordance with BS 5837:2012, and provides a robust basis for identifying both direct and indirect effects.</p> <p>Potential indirect impacts, including those arising from construction activities in proximity to retained features, have been appropriately considered within the assessment, including effects on RPAs, with buffers applied in line with Natural England and Forestry Commission standing advice, canopy impacts, and diversion around RPAs where feasible.</p> <p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the Applicant's compliant assessment and secured mitigation measures in relation to ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodlands, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in respect of that policy. Furthermore, the buffers applied to these features is in line with Natural England and Forestry Commission standing advice, canopy impacts, and diversion around RPAs, where feasible.</p> <p>Impacts arising from access and highway works have been identified, assessed and minimised through iterative design, with further refinements and clarifications provided at Deadline 2 to address any inconsistencies. Long-term protection and management of retained features are secured through the detailed Arboricultural Method Statement, detailed Construction Environmental Management Plan and</p>	The Applicant's response is noted. Please see responses to 3.20, 3.24 and 3.32.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>detailed Decommissioning Environmental Management Plan, ensuring appropriate control across all phases of the development.</p> <p>Accordingly, the Applicant considers that arboricultural impacts have been robustly assessed, avoided where practicable, and appropriately mitigated, and that the Proposed Development is consistent with national policy requirements.</p>	
3.35	4.3.164	<p>Comment recognising that certain detailed construction and management matters would be addressed through post-consent documentation. Further comment noting that a reliance on later-stage approval alone does not provide sufficient assurance that arboricultural mitigation will be delivered as intended. For mitigation to be effective, the principles underpinning buffer provision, protection of RPAs and management of works near trees must be clearly defined and secured from the outset of the Proposed Development.</p>	<p>ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies and evaluates impacts arising from construction, access and highway works, and operational phases, including tree and hedgerow removals, pruning requirements, and potential RPA incursions. The level of detail provided is proportionate to the current stage of design of the Proposed Development within the DCO process. At the detailed design stage of the Proposed Development, further refinement of layout and construction methodologies will be undertaken from which a detailed Arboricultural Method Statement will be submitted for approval by the relevant planning authority in consultation with the Environment Agency, as detailed and secured through the Outline CEMP [EN010158/APP/7.2] [APP-138] and by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].</p> <p>Further, as noted above, Design Commitment C7 in Design Commitments [EN010158/APP/5.9.4] secures that the principal components of the Proposed Development will avoid RPAs of trees as far as reasonably practicable. Where this is not possible, works will be undertaken under arboricultural supervision and 'no dig' construction methods will be used to protect the soil and minimise root impacts, as secured within the Outline CEMP [EN010158/APP/7.2.3].</p> <p>Accordingly, the Applicant considers that mitigation measures that are appropriate and proportionate for this stage of the Proposed Development's design are suitably secured.</p>	<p>The Applicant's response is noted. It is accepted that some matters will appropriately be addressed through post-consent documentation. However, where the effectiveness of arboricultural mitigation depends on buffers, RPAs, and works in proximity to retained features, some additional outline-stage clarity would be helpful in showing how those principles are intended to operate in practice.</p>
Effects on Ancient Woodland, Veteran Trees and Hedgerows				
3.56	4.3.2, 4.3.87, 4.3.88 and 4.3.89	<p>Comment that buffers to Ancient Woodland should be at least 50m from the woodland edge and that other woodlands should benefit from a minimum 25m buffer and hedgerows should benefit from a minimum 10m buffer from their edge.</p> <p>Further comment that the proposed 30m buffer to ancient woodland contravenes VALP Policy NE8</p>	<p>As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to RR-026 at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] (and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]) includes a minimum 30m offset from all ancient woodland with an</p>	<p>The Applicant's clarification of the proposed offsets is noted. However, the Council's earlier point was not simply whether buffers are provided or aligned with general guidance, but whether the proposed stand-offs are demonstrably adequate in relation to the value, sensitivity and long-term protection requirements of the features affected, particularly ancient woodland, other woodland and important hedgerows. In that context, the preference for a clearly evidenced, feature-specific buffer strategy is unchanged.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		<p>which mandates a 50m buffer. Comment that the Proposed Development contravenes the objectives of VALP Policy NE1, specifically part h.</p>	<p>additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. These buffers were considered in the assessment of the Proposed Development on SSSIs (including the SSSIs which comprise ancient woodland). In its Relevant Representation [RR-203] Natural England has confirmed this:</p> <p><i>“Potential direct and indirect impacts to the interest features of the SSSIs have been appropriately assessed. Natural England agree with the conclusion that there are no residual impacts (after mitigation) on SSSIs.”</i></p> <p>Therefore, Natural England are in agreement that the proposed 30m buffer from ancient woodland in combination with the mitigation measures proposed within the Outline CEMP [EN010158/APP/7.2.3] is sufficient to protect ancient woodland.</p> <p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the irreplaceable nature of ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodlands, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in respect of that policy. Appendix 4 (Policy Compliance Assessment Tables) of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] provides an assessment of the Proposed Development against the objectives established under VALP Policy NE1 and concludes that the Proposed Development is compliant with the objectives of this policy.</p> <p>ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] already commits to a minimum 20m buffer from other woodland, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence. These measures are secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4].</p> <p>Measurements from hedgerow centrelines are the most consistent and accurate way to measure and implement on</p>	

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			Site and maintains the intended ecological buffer and prevents the hedgerow itself from reducing the usable buffer width.	
3.61	4.3.107	Comment that Buckinghamshire Council consider that the Proposed Development has the potential to give rise to direct, indirect and long-term arboricultural impacts affecting trees, hedgerows, woodland edges, and veteran trees within and adjacent to the Order Limits. These impacts may arise during construction, persist during the operation (including maintenance), and potentially occur again at the decommissioning phase.	The Applicant acknowledges that the Proposed Development has the potential to give rise to direct, indirect and long-term arboricultural impacts and considers that these potential impacts have been appropriately identified and assessed in line with the current stage of design and addressed within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] . It concludes that, with the application of embedded mitigation and secured management measures, these impacts will not result in likely significant effects on relevant arboricultural features. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] on page 43) , trees within the Order Limits already form part of actively managed agricultural boundaries. As such, post-development pressures are not anticipated to materially change, and ongoing management, including sensitive pruning, can continue to be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations. Where impacts remain, these are clearly defined and limited in extent and are capable of being effectively mitigated through embedded design measures (e.g. buffers and stand-offs) and secured controls, including the Arboricultural Method Statement (AMS), Outline LEMP [EN010158/APP/7.6.3] and Outline DEMP [EN010158/APP/7.4.3] .	The Applicant's response is noted. The updated AIA and Outline LEMP are helpful, particularly the clearer treatment of highway/access-related arboricultural impacts in the AIA and the stronger monitoring and management framework in the Outline LEMP.
3.62	4.3.108	Comment that the significance of the impacts of vegetation removal is not limited to the number of features removed but also includes the impacts of ecological and landscape fragmentation, with particular regard for important hedgerows. Further comment that replacement planting would take time to establish to be of a like value to that removed.	The Applicant acknowledges that the Proposed Development will give rise to some direct arboricultural impacts, including the removal of limited sections of hedgerows, groups, and individual trees to facilitate the Proposed Development as set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] . The extent of removal is limited in scale and predominantly relates to sectional hedgerow removal to enable access between fields, with limited individual trees, one group and small sections of groups affected, and no veteran trees or Ancient Semi-Natural	The Applicant's response is noted. The Council's earlier point was not limited to the quantity of vegetation loss, but also to the importance of retaining the function and continuity of important hedgerows and associated arboricultural structure. In that context, the broader effects of fragmentation remain relevant.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Woodland proposed for removal. The majority of linear features will therefore be retained, preserving the overall arboricultural landscape character.</p> <p>As detailed above, the Applicant recognises the historical and ecological significance of the hedgerow network as detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3], with loss of important hedgerow kept to a minimum. Replacement hedgerow planting and new hedgerow 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. These proposals are detailed within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and the Outline LEMP [EN010158/APP/7.6.3] and secured by the Outline LEMP and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4]. It is acknowledged that new hedge planting would take some time to fully establish (perhaps 10 years) but this certainly does not equate to permanent loss. The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and</p> <p>Outline CEMP [EN010158/APP/7.2.3] outline measures to ensure maintenance of the linear nature of any gaps until the reinstated hedgerows have had time to establish sufficiently. These measures are secured by Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].</p>	
3.63	4.3.110	<p>Comment that over the operation (including maintenance) phase of the Proposed Development, future tree growth and crown expansion has the potential to conflict with infrastructure and operational requirements, meaning that there is a risk of incremental tree management (through pruning) resulting in the erosion of natural arboricultural value across the Site.</p>	<p>The embedded mitigation detailed in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] includes a minimum 30m offset from all ancient woodland and 20m from other areas of woodland with an additional 5m from solar panels to the security fence. These offsets ensure that retained trees and woodland are not placed under undue pressure from operational requirements, and that future growth and crown expansion can be accommodated without conflict with infrastructure. Operational management will therefore be largely limited to existing hedgerows and access routes. As stated earlier in the table (see response to paragraph 4.3.107 of the LIR), post-development pressures are not anticipated to materially change, and ongoing management,</p>	<p>The Applicant's response is noted. The updated Outline LEMP provides a clearer management framework, which is helpful. However, where long-term tree growth and crown expansion are relied upon to remain compatible with nearby infrastructure and operational requirements, it would still be helpful for the practical basis of that assumption to be clearly demonstrable, particularly where retained trees and woodland edges sit in relatively close relationship with the developed areas.</p>

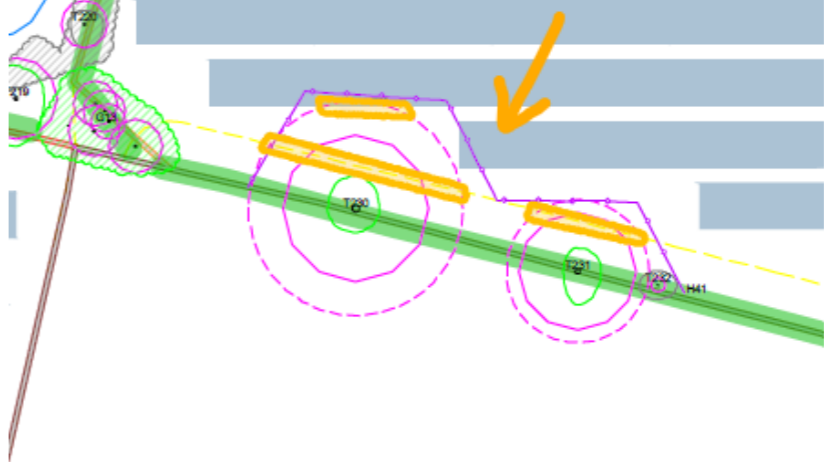
Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>including sensitive pruning, can continue to be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations.</p> <p>The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase.</p> <p>These documents have been updated to state: “A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified”.</p>	
3.64	4.3.113	<p>Comment recognising that a number of veteran and ancient trees are located in proximity to the Proposed Development and so there remains potential for there to be indirect impacts on these trees during the construction phase.</p>	<p>The presence of veteran trees in proximity to the Proposed Development is acknowledged, and their high sensitivity to both direct and indirect impacts is recognised. Design Commitment C7 within Design Commitments [EN010158/APP/5.9.4] states that the principal components of the Proposed Development will avoid RPAs of trees and hedgerows as far as reasonably practicable, except where hedgerow crossings are required for access tracks and/or cable routes. In addition, potential indirect impacts on veteran trees during construction (including changes in soil conditions, compaction and hydrology) will be appropriately managed through the implementation of an Arboricultural Method Statement (AMS). The AMS will set out specific protection measures, working methods, and where necessary, enhanced buffers and supervision requirements for retained veteran trees, secured through the Outline CEMP [EN010158/APP/7.2.3] and Requirement 11 of the Draft DCO [EN010158/APP/3.1.4].</p>	<p>The Applicant's response is noted. It remains important that trees of elevated sensitivity, including those associated with ancient woodland edge conditions and veteran characteristics, are supported by a clearly demonstrable protection and management approach where works occur in relative proximity.</p>
3.65	4.3.114 and 4.3.115	<p>Comment noting that a proportion of retained trees are located within hedgerows or along woodland edges in proximity to the Proposed Development's operation (including maintenance) phase infrastructure. Further comment noting that veteran trees or trees with potential to develop veteran characteristic need to be clearly identified, appropriately buffered and positively managed as there is a risk that routine maintenance may progressively reduce a tree's canopy, disturb roots or</p>	<p>The Applicant considers that relevant retained trees, including veteran trees or trees with potential veteran features, are sufficiently identified and buffered and will be appropriately managed as part of the Proposed Development. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], veteran trees have been clearly identified and afforded additional protection, including the application of precautionary buffer zones exceeding standard RPAs, informed by relevant guidance. As stated</p>	<p>The Applicant's response is noted. It remains important that retained trees within hedgerow and woodland-edge structure are considered not only as individual features, but also in terms of their wider long-term function within the landscape and mitigation framework.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		result in its decline.	earlier in the table (see response to paragraph 4.3.110 of the LIR) the Proposed Development incorporates significant stand-off distances from infrastructure. Relevant operational activities, including vegetation management, will be controlled and proportionate, largely reflecting existing practices. Any necessary tree works will be undertaken in accordance with BS 3998:2010 Tree Work – Recommendations, ensuring that pruning is appropriate and does not lead to long-term degradation. Accordingly, the risk of progressive canopy reduction, root disturbance, or decline is considered low and appropriately mitigated through design, buffers, and management measures secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] .	
3.66	4.3.116	<p>Comment that the Applicant's assessments do not sufficiently integrate the long-term growth characteristic of retained trees over the operation (including maintenance) phase of the Proposed Development.</p> <p>Further comment raising concern with confidence that the operational management and maintenance activities have been adequately identified, assessed, or mitigated for from the outset.</p>	<p>The Applicant does not agree that long-term growth characteristics of retained trees have not been integrated as part of the relevant assessment. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], the design has been informed by precautionary buffer distances, RPAs, and additional stand-offs for veteran and high-value trees, which inherently account for future growth, rooting requirements, and long-term retention. The Proposed Development incorporates substantial offsets from woodland edges, Ancient Woodland, and hedgerows, ensuring that retained trees have sufficient space to accommodate crown expansion and root development over the operational period, without conflict with infrastructure.</p> <p>The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] have been updated at Deadline 2 to commit to a programme of inspections during the operation (including maintenance) phase.</p> <p>These documents have been updated to state: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified".</p> <p>Accordingly, the Applicant is confident that operational management and maintenance activities have been adequately identified, assessed, and mitigated where</p>	The Applicant's response is noted. Please see response to 3.63.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			required.	
3.67	4.3.117 and 4.3.118	Comment noting the location of a group of trees with potential to be native black poplar within the hedgerow between Fields D12 and D13. Further comment recognising the Applicant's view that this group of trees is to remain unaffected by the Proposed Development but that Buckinghamshire Council considers otherwise due to uncertainty in survey methodology and the flexibility inherent in the outline layout. Further comment that clarity on species identification, buffer provision, protection measures, and long-term management is considered necessary to ensure that potential impacts are adequately addressed.	<p>The Applicant confirms that the group of trees (G98) identified as potentially comprising native black poplar is not affected by the Proposed Development, as set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. The group is located outside of areas required for infrastructure, access, or construction activity, and will be retained and protected in full. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 44), definitive identification of native black poplar (<i>Populus nigra</i> subsp. <i>betulifolia</i>) requires DNA testing and specialist laboratory analysis, which falls outside the scope of a standard BS 5837:2012 arboricultural survey.</p> <p>Notwithstanding this, the assessment has adopted a precautionary approach, treating the group as a feature of elevated value. Accordingly, the Applicant considers that sufficient clarity has been provided in respect of species consideration, protection, and management and that any potential impacts on the species have been accurately and robustly assessed.</p>	The Applicant's response is noted. The updated AIA now states that G98, identified as black poplar and possibly native black poplar, will remain unaffected by works and fenced beyond projected RPA, which is welcomed. However, that position still depends on the protective fencing being correctly located and works in the vicinity being managed as assumed. It therefore remains important that G98 is clearly identified, retained and managed in a way that supports its long-term retention.
3.68	4.3.128 and 4.3.129	Comment that, on review of the Outline Drainage Strategy, a number of proposed attenuation features are shown in proximity to or within areas identified as buffers to woodland which is of concern to Buckinghamshire Council. Further comment noting examples to the west of Field B3, south-west of Field B7 and to the south of Field B18. Further comment recognising the indicative nature of the drainage strategy.	The Applicant acknowledges that some proposed attenuation features are near or within woodland buffer areas; these have been strategically proposed in those indicative locations based on the local topography, to ensure that surface water management can mimic the existing flowpaths on site and by gravity, in accordance with the principles of sustainable drainage. Any other locations for these attenuation features on those three plots would require mechanical drainage systems including electrical pumps; this would require increased inspections and maintenance frequency. To promote the use of these SuDs by gravity, it is proposed to maintain the attenuation features in their current indicative locations. The ponds are designed to manage surface water runoff from the Solar PV	The Applicant's response is noted. The updated drainage material, including the revised attenuation pond locations, is also acknowledgement. However, without a clearly fixed and feature-specific buffer arrangement, and without outline-arboricultural method clarity, it remains unclear how these works would be carried out in proximity to retained arboricultural features without affecting RPAs, buffer function and runoff conditions.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>development, ensuring runoff into the woodland does not exceed the pre-development green field rates. These attenuation features are considered to be compatible in nature and operation to the support the existing woodlands as they are designed to enhance the biodiversity and amenity value of the Proposed Development.</p> <p>Further details are provided in Outline Drainage Strategy [EN010158/APP/7.11.3].</p>	
3.69	4.3.130	<p>Comment noting that the introduction of attenuation features typically involves ground excavations and changes to ground levels. Therefore, the introduction of such features in woodland buffers conflicts with retaining them as undisturbed transition zones, free from excavation and construction activity.</p>	<p>As outlined in the Outline LEMP [EN010158/APP/7.6.3] all buffer zones will require some ad hoc management over the life of the solar farm to maintain a mosaic of scrub and grassland habitat, but this will be very light touch on an infrequent basis likely occurring during the winter months when sensitive species are dormant. Attenuation features will likely involve an element of short-term temporary disturbance at the construction phase, but features will be carefully placed to avoid impacts to root protection zones and as such do not undermine the long-term objective of maintaining root protection zones as undisturbed transition zones. It is also considered that temporary water within attenuation basins and development of damp grassland may attract invertebrates of value to foraging bat species.</p> <p>In particular, the construction works of such attenuation systems will also work with the local sloping topography and include a mixture of excavations and land raising to create the optimum attenuation capacity, hence minimising the extent of excavations where possible.</p> <p>Details about how the attenuation features will be provided and maintained without harming trees will be provided within the Arboriculture Method statement and cross referenced in the Drainage Strategy at the detailed design stage.</p>	<p>The Applicant's response is noted. Please see response to 3.68</p>
3.70	4.3.131	<p>Comment noting that the proposed location of attenuation features within woodland buffers risks the erosion of buffer integrity over time and further illustrates the limitations of relying on generic buffer distances. Further comment that this reinforces the need for consistency with VALP Policy NE8.</p>	<p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Paragraphs 9.16.53 to 9.16.60, the irreplaceable nature of ancient woodland, ancient trees, veteran trees and other irreplaceable habitats. The Planning Statement notes that, whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodlands, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in respect of that policy.</p>	<p>The Applicant's response is noted. Please see response to 3.68</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>The introduction of the SuDS features in these locations are strategic for surface water management across the Proposed Development and also to ensure no impact on the ancient woodland is posed by increased runoff from site.</p> <p>These attenuation features are considered to be compatible in nature and operation to the existing woodlands as they are designed to enhance the local biodiversity and amenity value of the Proposed Development, in supporting the adjacent woodland areas.</p> <p>The construction works of such attenuation systems will also work with the local sloping topography and include a mixture of excavations and land raising to create the optimum attenuation capacity, hence minimising the extent of excavations where possible.</p>	
3.72	4.3.138	<p>Comment reflecting Buckinghamshire Council's uncertainty as to whether the secured mitigation and management measures are sufficiently defined, proportionate and robustly secured for the protection of arboricultural assets.</p>	<p>All mitigation measures specified in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] and ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] related to the protection of arboricultural assets are sufficiently defined and considered proportionate to the potential impacts that could occur and are secured in Works Plans [EN010158/APP/2.3.3] [REP1-005], Design Commitments [EN010158/APP/5.9.4], Outline CEMP [EN010158/APP/7.2.3] as well as the Arboriculture Method Statement, Outline LEMP [EN010158/APP/7.6.3] and the Outline OEMP [EN010158/APP/7.3.3]. The Works Place, the Design Commitments and the management plans are secured by the relevant requirements in the draft DCO.</p>	<p>The Applicant's response is noted. The updated Outline LEMP and related documents are helpful. Please see responses 3.32.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
3.76	4.3.142	<p>Comment that the proposed hedgerow buffers do not adequately reflect the presence of mature boundary trees within many hedgerows, nor do they account for future crown spread and rooting requirements over the lifetime of the Proposed Development. Further comment that there is no consistent application of enhanced buffers specific to veteran or potentially veteran trees, despite their sensitivity and long-term value.</p>	<p>The Applicant does not agree that hedgerow buffers fail to account for mature boundary trees or future growth requirements. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], mature trees within hedgerows have been individually surveyed and assessed, rather than treated solely as hedgerow features. Their RPAs, canopy spreads, and retention categories have been defined and have informed the design and layout. As previously stated throughout the table specific set back distances have been applied. In relation to veteran and potential veteran trees, the assessment confirms that these features have been clearly identified and afforded enhanced protection, including the application of additional buffers beyond standard RPAs in line with relevant guidance, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance makes clear that <i>"for ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage."</i> Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.</p>	<p>The Applicant's response is noted. However, the updated plans already show areas of "Potential RPA Impact" alongside the proposed protection layout, which suggests that conflict with retained trees is already anticipated at outline stage.</p> <p>In that context, a generic offset does not in itself demonstrate how mature hedgerow trees and their RPAs would be accommodated in practice over the lifetime of the development. Greater feature-specific clarity would therefore still be helpful.</p> 
3.77	4.3.144	<p>Comment that Buckinghamshire Council does not consider that the proposed buffer strategy within the Arboricultural Impact Assessment demonstrates a proportionate and feature-specific strategy for the safeguarding of trees, hedgerows, and woodland over the long term. Further comment that the strategy does not comply with VALP Policy NE8.</p>	<p>This has been addressed within the Applicant's responses to points 3.76 and 3.69 above. The Applicant does not agree that the buffer strategy is disproportionate or non-specific. The approach to buffers within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] is feature-specific and informed by site survey data, including the application of RPAs, canopy spreads, and additional precautionary offsets where required.</p> <p>As stated within the Planning Statement [EN010158/APP/5.7.3] [REP1-016] whilst not strictly in compliance with Policy NE8 of the VALP's general requirement for setback distances to be 50m between development and ancient woodland, the Proposed Development is considered to be of a less impactful nature than what constitutes 'general development' in respect of that policy. Furthermore, Natural England and the Forestry Commission's 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' guidance makes clear that <i>"for ancient woodlands, the proposal should have</i></p>	<p>The Applicant's response is noted. Please also see response 3.76.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p><i>a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage.</i>" Therefore, the Applicant considers that the 30m offset secured is proportionate to the nature of the Proposed Development.</p>	
3.78	4.3.145	<p>Comment requesting greater clarity within the Outline LEMP regarding the long-term management of woodland edge conditions, hedgerows and retained trees, and how conflicts arising from tree growth over time will be avoided.</p>	<p>The approach to management of hedgerows and hedgerow trees to avoid conflict between tree growth and panel shading over time is set out on page 43 in response to [RR-026] within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]. The Outline LEMP [EN010158/APP/7.6.3] was updated at Deadline 1 to provide further clarity on this. This reiterates the buffers that will be applied from hedgerows, trees, and woodland, which are secured in the Outline LEMP [EN010158/APP/7.6.3], Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] and the Design Commitments [EN010158/APP/5.9.4]. Any localised shading that may occur can be managed through sensitive pruning in line with BS 3998:2010 Tree work – Recommendations, rather than creating an unavoidable need for significant tree reduction or felling.</p> <p>The Outline OEMP [EN010158/APP/7.3.3] and the Outline LEMP [EN010158/APP/7.6.3] has been updated at Deadline 2 to include text that states: "A programme of arboricultural inspections will be undertaken by a qualified arboriculturist, comprising annual inspections for the first 3–5 years post-construction, followed by inspections at a minimum of every 3 years thereafter. Veteran trees and other sensitive features will be subject to more frequent monitoring (every 1–2 years). Additional inspections will be undertaken following severe weather events or where concerns are identified".</p>	<p>The Applicant's response is noted and the updated Outline LEMP is welcomed, but the Council remains concerned that the relationship between retained vegetation and nearby structures is not yet sufficiently clear in the more sensitive locations.</p>

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3.79	4.3.151 and 4.3.152	<p>Comment that the cumulative effects of direct arboricultural losses, indirect construction impacts and long-term operational pressures have the potential to result in a gradual erosion of arboricultural value across the Site. Further comment recognising the combination of these effects may be significant, particularly with regard for other large-scale infrastructure projects locally.</p> <p>Comment is provided with an example of cumulative pressures at Decoypond Wood.</p>	<p>The Applicant does not agree that the cumulative effect of impacts from the Proposed Development and other relevant developments would result in a gradual erosion of arboricultural value across the Site. As set out within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2], direct losses are limited in extent and clearly defined, with the majority of hedgerows, trees and woodland features retained, and no loss of veteran trees or Ancient Woodland. Potential indirect and operational effects have been identified and addressed throughout this table.</p>	<p>The Applicant's response is noted. No further arboricultural comments are made on this point at this stage.</p>
3.80	4.3.153 and 4.3.154	<p>Comment that the Order Limits overlap with the HS2 Act Limits and that the Proposed Development proposes panels within areas that are to be or have been planted as woodland by HS2, reducing the buffer that was secured adjacent to Decoypond Wood Ancient Woodland and also reducing the commuting route for bats provided within this key area. Further comments stating that the proposed panel layout has the potential to adversely affect both ancient woodland integrity and the functionality of the ecological network carefully planned as part of HS2.</p>	<p>The Applicant is aware that some parcels of the land within the Order Limits are covered by The Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we plan to submit to the Examining Authority, once available.</p> <p>The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.3].</p>	<p>The Applicant's response is noted. Pending further confirmation referred to by the Applicant, it remains important that the scheme's own retained buffer and mitigation framework is clearly identifiable in its own right in this area.</p>
3.81	4.3.155	<p>Comment noting that buffers to safeguard Ancient Woodland should not also be used to compensate for impacts arising from infrastructure projects. Further comment on the point that buffer zones should operate as relatively undisturbed transition zones and that expecting such buffers to perform additional mitigation roles undermines the buffer function.</p>	<p>The Applicant is not aware of any policy limitation with using buffers to implement more than one element of mitigation, nothing proposed within the buffers is likely to directly impact soil or the root protection zone of trees (see row 3.67 and 3.68 regards safeguards from siting attenuation features). The width of the proposed buffers from woodland features and the proposed long-term management being a mosaic of scrub and rough grassland are designed to act as relatively undisturbed transition zones between the Proposed Development and woodland habitat whilst also ensuring connectivity with the wider</p>	<p>The Applicant's response is noted. No further arboricultural comments are made on this point at this stage.</p>

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			<p>landscape and allowing continued use of the landscape by foraging bats and other species. As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites.</p>	
3.82	4.3.156	<p>Comment that the Proposed Development includes modest diversions to Footpaths SCL/13/1 and SCL/13/2 in the vicinity of Decoypond Wood but that doing so introduces additional activity and movement along a sensitive woodland edge that is already subject to cumulative pressures arising from HS2 works and the Proposed Development itself.</p>	<p>The diverted route now follows the edge of Decoypond Wood for approximately 158m, whilst exiting Field B7 at the corner of the wood as it does at present. Buckinghamshire Council's Rights of Way team have indicated their preference for PRoW diversions to follow the edge of fields to aid wayfinding for PRoW users. Discussions at consultation events and feedback received from Phase One and Phase Two Consultation have suggested that PRoW within Parcel 1 are less frequently used than PRoW directly accessible from Botolph Claydon in Parcel 2, as reflected to some extent in the summary responses considered in Consultation Report Appendices J-1 to J-2 [EN010158/APP/5.2] [APP-029]. The Applicant does not consider that there would be large enough numbers of walkers using the route to create disturbance to the woodland. In addition, additional recreational routes would be created within the Site, potentially spreading recreational disturbance away from Decoypond Wood. The diversions are described in ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034] and the Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.3], and secured by the Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006].</p>	<p>The Applicant's response is noted. No further arboricultural comments are made on this point at this stage.</p> <p>While the diversion route is accepted from a rights of way perspective in terms of convenience, additional distance and width, it's unlikely the ROW officer suggested a field edge option helps with wayfinding. It's more likely achieved by good way marking, but evidence of this comment is requested.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
3.83	4.3.157	<p>Comment summarising the need for more generous buffers around Ancient Woodlands for the above mentioned factors. Further comment reiterating that enlarged buffers would reinforce their function and the capacity in accommodating cumulative pressures, without being compromised by overlapping mitigation demands or additional land-use pressures, in order to safeguard the long-term integrity and resilience of woodland assets.</p>	<p>As stated within Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-026] at page 38), the embedded mitigation detailed in Table 7.6 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] and secured by the Outline LEMP [EN010158/APP/7.6.3], Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] and Design Commitments [EN010158/APP/5.9.4] includes a minimum 30m offset from all ancient woodland with an additional 5m from solar panels to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. In addition, the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] secured via Outline LEMP [EN010158/APP/7.6.3] and Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] already commits to a minimum, 10m buffer between the developable area and hedgerows and a minimum 15m buffer from hedgerows located within Fields B3 and B7, between Fields B7 and B8/B10 and between Fields B8/B10 and B9/B11, with an additional 5m from solar panels to the security fence, with the measurement being offset either side from centre line of hedgerows within the Order Limits. The Applicant considers the mitigation proposed will be effective in offsetting the impacts identified.</p>	<p>The Applicant's response is noted. Please also see response 3.56.</p>
3.84	4.3.158	<p>Comment on review of the proposed mitigation, together with the uncertainties identified in relation to survey accuracy, buffer adequacy, access, and highway works, long-term management and cumulative pressures, mean that residual adverse effects on trees, hedgerows and woodland cannot be ruled out.</p>	<p>As stated throughout this table (3.19, 4.3.94, 4.3.111 and 4.3.137), the Applicant considers that the survey effort for arboricultural receptors is sufficient and accurate to inform the robust assessment presented and the proposed mitigation to offset potential impacts regards survey accuracy, access and highways works are considered appropriate and proportionate, as detailed within ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]. Buffer adequacy is dealt with in 4.3.157 above.</p> <p>As outlined above and throughout this table, the Applicant considers that the survey effort for ecological receptors is sufficient and accurate to inform the robust assessment presented and the proposed mitigation to offset potential impacts are considered appropriate and proportionate, detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3].</p>	<p>The Applicant's response is noted. The Council's earlier point was that, taken together, issues of survey confidence, buffer adequacy, access and highway interfaces, long-term management and cumulative pressure mean that greater outline-stage arboricultural clarity remains helpful in demonstrating that effects have been sufficiently avoided or mitigated in practice. The recent AIA and LEMP updates are helpful, but do not materially alter that overarching point.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
3.85	4.3.159	<p>Comment that there remains uncertainty as to whether the proposed buffers and management measures are sufficient to safeguard Ancient Woodland edge conditions, veteran and future veteran trees, and important hedgerows over the lifetime of the Proposed Development.</p>	<p>As stated throughout this table (3.19, 4.3.94, 4.3.111 and 4.3.137), the Applicant does not agree that there remains uncertainty regarding the effectiveness of the proposed buffers and management measures. The full assessment is presented in ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] demonstrates that precautionary, feature-specific buffers have been applied, including up to 30m offsets from Ancient Woodland, additional stand-offs from woodland edges and hedgerows, and enhanced protection for veteran trees.</p>	<p>The Applicant's response is noted. Please see responses 3.64 and 3.78.</p>
3.86	4.3.160	<p>Comment that there is a risk of incremental and cumulative impacts (across all phases of the Proposed Development) leading to a gradual erosion of arboricultural value that would be difficult to reverse.</p>	<p>As set out throughout this table, the Applicant does not agree that there is a risk of incremental or cumulative impacts leading to a gradual erosion of arboricultural value. The ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] identifies impacts across all phases and demonstrates that these are limited, clearly defined, and appropriately mitigated through embedded design, including retention of the majority of hedgerows, trees and woodland features and no loss of veteran trees or Ancient Woodland and the application of buffers.</p> <p>All phases of the development are subject to secured management and protection measures, ensuring that retained trees, hedgerows and woodland are protected and sustainably managed over the long term (see the Applicant's response to paragraph 4.3.138 of the LIR). In addition, over 8ha of new woodland planting is proposed.</p>	<p>The Applicant's response is noted. Please see response 3.84.</p>

Table 3-4: Cultural Heritage

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Effects on Cultural Heritage, including Designated and Non-Designated Heritage Assets				
4.1	4.5.2	<p>Comment stating that harm would arise from solar farm infrastructure across agricultural fields to the south of Orchard Way within former estate land associated with Claydon House. Comment noting some visibility of solar panels from views at the principal elevation and associated terrace of Claydon House, particularly from the first-floor rooms with regard for views to Knowl Hill. Further comment that, whilst not obstructing this view, the Proposed Development would introduce energy infrastructure into this view, characterised by uniform, linear arrays contrasting with the existing agricultural fieldscapes, which have formed the foreground in views of Claydon House and Park since the 18th century.</p>	<p>As noted within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] views from the principal (west facing) elevation of Claydon House and terrace will have oblique views of the solar arrays and collector compound within Parcel 1. ES Volume 4, Appendix 10.6: LVIA Visualisations Claydon House [EN010158/APP/6.4.3] submitted at Deadline 2 and shared with Buckinghamshire Council, showing the viewpoint from the upper floor of Claydon House (from within the "Chinese Room") confirms the assessment within Annex D that there would be additional visibility from the upper floor of the house. The foreground of the view from Claydon House is of the parkland landscape - solar arrays and the Satellite Collector Compound in Parcel 1 would be visible in the middle distance beyond the boundary of the park.</p> <p>At ground level (including from the terrace on the west side of Claydon House) views of the Solar PV modules would be filtered by existing vegetation within the park and by intervening hedgerows along Orchard Way and along Three Points Lane which will serve to break up the views of panels. From the upper floors of the house there would be visibility of the Solar PV modules and Satellite Collector Compound from the principal elevation on the west side of the house. Views towards the arrays from the south side of the house (including windows facing west on the south side of the house) would be obstructed by topography, the church building and trees around the church. The house is oriented due west, therefore the Solar PV modules to the southwest would not be the main focus of views as they would be seen obliquely from the interior of the house. In addition, the location of solar PV modules within the existing field structure, which itself will be strengthened with additional hedgerow and tree planting, would serve to break up the uniformity of the arrays.</p> <p>The proposed additional avenue tree planting along Three Points Lane will provide additional visual screening whilst avoiding obstruction of the views towards Knowl Hill both at ground level and from within the upper floors of the house.</p>	<p>As stated by the Applicant, the visualisations from the additional viewpoint, from the upper floor of Claydon House, confirms that there would be some visibility from the upper floor and that from the ground floor the views are filtered. It is noted that additional tree plant planting along Three Points Lane will provide additional visual screening whilst avoiding obstruction of the views towards Knowl Hill.</p> <p>However, the setting of grade I listed Claydon House and its buildings (the grade I listed Church of All Saints, and grade II listed stables, Fernery and archway at the SW end of the stables) consists of more than views from the house and the area in front of it.</p> <p>Setting is defined in NPS EN1 as the surroundings in which it a heritage asset is experienced (EN1, footnote 199 to paragraph 5.9.3) and Historic England's setting guidance identifies that setting is not purely visual, but also associative. The elements of setting that contribute to the house are not only visual and include:</p> <ul style="list-style-type: none"> • Views towards Claydon House, its buildings and landscape from various approaches and vantage points, • The wider associated estate, including former parkland within the registered park and conservation area, and parkland (including drives, woods and spaces) beyond these current boundaries, • The evidence of the wider estate's association with Claydon House beyond the registered park boundaries (including its parkland and satellite farms) that remains legible on the approach roads and paths to the formerly main south gate and in the architecture of satellite buildings. <p>The proposals would impact on these elements of setting and their contribution to Claydon House's significance. We therefore assess the harm as at the middle of the scale of less than substantial harm, as these relationships would be harmed.</p> <p>The Applicant's response indicating that the church interrupts views towards the arrays, suggests that the grade I listed church may be visible from Knowl Hill and from other views beyond the arrays, as well as from locations where the arrays and church may be visible. The church is part of the close cluster of buildings that form the nucleus of Claydon House and its park, being a significant designated asset in its own right, as well as contributing greatly to the significance of the house, its park and through its historic role as a religious and community/social hub within the estate and for surrounding farms and villages.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>The Applicant has agreed with Historic England and National Trust that the harm to the significance of Claydon House and Claydon Park would be less than substantial and would sit within the lower end of this scale of harm. This agreement is captured within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and Statement of Common Ground with National Trust [EN010158/APP/5.17.2] submitted at Deadline 2.</p>	
4.2	4.5.3	<p>Comment that the Proposed Development would affect the relationship of the Claydon House and Park with its satellite farms thereby impacting their setting and the setting of Claydon House and Park.</p>	<p>The satellite farms of Claydon are: Pond Farmhouse (Grade II listed), Muxwell Farmhouse (Grade II listed), Blackmoorhill Farmhouse (Grade II listed), Rosehill Farmhouse (Grade II listed), and Catherine Farm (non-designated heritage asset). It should be noted that the building listed as Blackmoorhill Farmhouse is now known as Winter's Tale Farmhouse. Detailed assessment of all of these assets including their setting is provided in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2].</p> <p>The relationship between Claydon House and Park and the Grade II listed buildings of Blackmoorhill Farmhouse and Rosehill Farmhouse will not be altered by the Proposed Development as these two farms lie over 600m north of Orchard Way and the Proposed Development would be to the south of this road outside the land which was likely originally farmed from these properties. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the harm to their significance as a result of the changes in their wider setting would be of negligible magnitude and result in a neutral effect which is not significant.</p> <p>Catherine Farm also lies north of Orchard Way, opposite the proposed site access into Parcel 1. The Proposed Development will not impact on the relationship between Catherine Farm and Claydon House and Park as all development will be south of Orchard Way. Solar PV modules within Parcel 1 up to 160m southwest of the farmhouse would be visible on the approaches to the farmhouse along Orchard Way and would be visible from the farmhouse but would be filtered by the existing vegetation along Orchard Way and by the proposed enhancements of these hedgerow boundaries. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the change to the wider setting of</p>	<p>See comments on satellite farms in 4.1 above.</p> <p>The presence of arrays to the south of Orchard Way will affect the settings of Rosehill Farmhouse and Blackmoorhill Farmhouse (now Winter's Tale), as these fields and the approach roads that pass them and afford views of them will also include views of the arrays.</p> <p>The presence of major transport and energy infrastructure on the approaches to these farms on three sides of them farms will harm the legibility of their relationships and their wider relationships.</p> <p>The Council considers the harm to Pond Farmhouse to be at the high end of less than substantial harm for the reasons set out in paragraph 4.5.56 of the Local Impact Report. Its contribution to the significance of Claydon House (derived from its visual relationships and legible historic functional and spatial relationships) will be harmed by the proposals and additional planting will visually sever the relationships further, rendering them less legible. Upper floor views from the farmhouse towards Claydon House are likely to include arrays.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Catherine Farm would be an impact of minor magnitude resulting in a slight adverse effect which is not significant.</p> <p>There will be no Solar PV modules around Muxwell Farmhouse due to design changes after Stage 1 Consultation: the fields to the south of Muxwell Farmhouse have been removed from the Order Limits and the fields to the north will be used only for the (below ground) interconnecting cable and returned to agriculture or used for ecological mitigation. There will therefore be no change to the relationship between Muxwell Farmhouse and Claydon House and Park. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the impacts on Muxwell Farmhouse would be negligible in magnitude and result in a neutral effect which is not significant.</p> <p>Pond Farmhouse is currently surrounded by farmland and woodland, it is encircled by the Order Limits (as illustrated on Works Plans [EN010158/APP/2.3.3] [REP1-005]) and the Proposed Development would introduce Solar PV modules into the farmland historically associated with the farmhouse. Solar PV modules have been excluded from Field B5 to the north of the farmhouse (which is the principal approach and elevation as illustrated on ES Volume 3, Landscape and Visual Figures [EN010158/APP/6.3] [APP-069] - see Figure 10.18: RVAA Property Plan – Pond Farm [EN010158/APP/6.3] [APP-069]) and from Field B13A to the east.</p> <p>Additional planting is also proposed along the western boundary of Field B5 to soften views of the Solar PV modules. The effects of the changes to the setting of Pond Farmhouse are acknowledged within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] as resulting in an impact of minor magnitude during construction and decommissioning which would result in a slight adverse effect that is not significant and an impact of moderate magnitude during operation which would result in a moderate adverse effect which would be significant.</p>	

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.3	4.5.3	Comment that the proposed development would introduce repetitive geometric forms and lead to a homogenisation of setting with resulting harm to landscape legibility across its setting	The layout of the proposed development has sought to retain existing woodland blocks and hedgerow boundaries and apply appropriate offsets from woodland, hedgerows and PRoW, as well as introducing additional planting and the creation of new permissive footpaths, to break up the appearance of the proposed development and preserve legibility of the historic landscape character of enclosed fields. The retained vegetation and new hedgerow and woodland planting, is shown in the Outline LEMP [EN010158/APP/7.6.3].	Although potential direct intervisibility between heritage assets and the proposals has been reduced by mitigation and the existing field boundaries and woodland blocks generally retained, with proposals set within them, the conservation areas' and historic buildings' settings would include extensive, repetitive solar arrays and other infrastructure features that would be visible and appreciable when moving to, from and through heritage assets kinetically, changing the character of the field systems and landscape of their settings, affecting significance. There would also be visibility from some heritage assets and in longer views towards them over the proposed arrays and other features.
4.4	4.5.3	Comment that, when the Proposed Development is taken together with other nearby solar and infrastructure projects, harm will result to: <ul style="list-style-type: none"> The unique sense of place which contributes to the significance of Claydon House, Claydon Park and the Middle Claydon Conservation Area; The understanding of their relationship with the surrounding estate; and The contribution of setting to the assets' significance. 	The Applicant disagrees that there would be cumulative harm to Claydon House, Claydon Park and Middle Claydon Conservation Area as a result of the Proposed Development in combination with other nearby solar and infrastructure projects. Other nearby solar and infrastructure projects have been considered within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] . The closest project included in the shortlist of cumulative schemes is the proposed National Grid East Claydon Substation which is likely to be co-located within the Order Limits of the Proposed Development. The proposed siting zone for the National Grid East Claydon Substation is c. 1.6km east of Claydon Park beyond East Claydon village and located within Parcel 3 of the Proposed Development. It has been assessed to lie outside the setting of Claydon House, Claydon Park and Middle Claydon Conservation Area and therefore would not result in a cumulative effect on these assets. Other solar and infrastructure projects on the cumulative short list likewise lie outside of the areas where the heritage significance of Claydon House, Claydon Park and Middle Claydon Conservation Area are appreciated and therefore will not result in cumulative effects	The Council's comments include infrastructure features beyond, as well as within order limits. Nothing to add to our previous comments
4.5	4.5.4	Comment noting that Buckinghamshire Council considers that the impact on Claydon House, its Park and associated landscape to be of less than substantial harm at the middle end of that scale.	The Applicant welcomes the agreement with Buckinghamshire Council that the harm to Claydon House, its Park and landscape is less than substantial. This agreement is detailed within the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] submitted at Deadline 2. The Applicant however maintains that the harm to the significance of Claydon House and its Park and associated landscape is at the lower end of this scale and on this point has reached agreement with Historic England and the National Trust. This agreement is detailed within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and the Statement of Common Ground with National Trust [EN010158/APP/5.17.2]	The Council disagree with the applicant's conclusion on the level of harm. The National Trust and Historic England did not assess impacts to the grade II listed buildings, and would therefore not have assessed the role of the satellite farms, their history and architecture in the setting of Claydon House.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			submitted at Deadline 2. The degree of less than substantial harm to Claydon House, its Park and landscape remains a matter under discussion with Buckinghamshire Council.	
4.6	4.5.5	<p>Comment noting that Pond Farmhouse (NHLE 1214849), Rosehill Farmhouse (grade II listed building, NHLE 1214846) and Blackmoorhill Farmhouse (grade II listed building, NHLE 1214848) were once satellite farms on what was part of Claydon House's agricultural estate. Further comment that the Proposed Development would disrupt these setting relationships (which have been damaged by HS2, East West Rail and other infrastructure projects) and would change the character of the estate which is a contributory element of their settings.</p>	<p>The effect of the changes to the setting of Pond Farmhouse are acknowledged within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] as resulting in an impact of minor magnitude during construction and decommissioning which would result in a slight adverse effect that is not significant and an impact of moderate magnitude during operation which would result in a moderate adverse effect which would be significant. As noted above, Blackmoorhill Farmhouse and Rosehill Farmhouse are located within parts of the historic estate of Claydon which lie beyond the Order Limits. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the harm to their significance as a result of the changes in their wider setting would be of negligible magnitude and result in a neutral effect which is not significant.</p> <p>HS2 is located c.700m southwest of Pond Farmhouse at its closest point and mitigation planting for HS2 would serve to screen HS2 from view whilst East West Rail lies over 1 km north of Pond Farmhouse and follows the route of the former Oxford and Bletchley Branch of the London and North West Railway (as illustrated on the 1st Edition Ordnance Survey map presented within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]). The Applicant considers that the change to the setting of Pond Farmhouse as a result of these two developments in combination with the Proposed Development would not increase the overall level of effect.</p> <p>East West Rail lies c.200m north of Rosehill Farmhouse and c.500m north of Blackmoorhill Farmhouse and as stated above follows the route of a historic railway line. HS2 is located over 1.2km west of Rosehill Farmhouse and over 1.7km southwest of Blackmoorhill Farmhouse. The Applicant considers that the cumulative effect of the Proposed Development in combination with the two railways on Rosehill Farmhouse and Blackmoorhill Farmhouse would remain negligible.</p> <p>No other infrastructure projects are considered to impact on Pond Farmhouse, Rosehill Farmhouse and Blackmoorhill Farmhouse.</p>	<p>Noted. The solar farm and other infrastructure projects together feature on the approaches and in views of these assets (for example, the concrete bridge over East West Rail, which forms an imposing element in the setting of Rosehill Farmhouse).</p> <p>The Council agree that with impacts of other projects on Pond Farmhouse are unlikely to elevate that from the applicant's proposals above the high end of less than substantial harm. However, the approaches to the farm and its western setting have and are impacted by other projects, as are Rosehill Farmhouse and Blackmoorhill Farmhouse.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.7	4.5.6 and 4.5.7	Comment stating that Buckinghamshire Council identify the impact on Pond Farmhouse to be at the upper end of the scale of less than substantial harm and that the harm to Blackmoorhill Farmhouse and Rosehill Farmhouse is less than substantial at the middle of the scale covered by less than substantial harm.	The Applicant disagrees and considers that the level of harm reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] correctly reflects the level of harm, which for Pond Farmhouse is at the middle of the scale of less than substantial and for Blackmoorhill Farmhouse and Rosehill Farmhouse is at the lower end of this scale.	The Council disagrees for the reasons previously provided.
4.8	4.5.8	Comment stating that Buckinghamshire Council identify less than substantial harm to the grade II* listed St Mary's Church (NHLE 1289625) which sits at the low to middle part of the scale	The Applicant broadly agrees, in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] the level of harm is judged to be at the lower end of the scale of less than substantial.	The church and its churchyard sit on top of a ridge and was designed as a landmark to be seen for some distance when viewed from the east and south east, especially from the raised ground in winter. It also marks the edge of East Claydon. These views will include the proposed Main Collector Compound and BESS. We consider the harm to be in the middle of the scale of less than substantial harm
4.9	4.5.9	Comment noting potential harm to Botolph House (grade II* listed building, 1212143), within Botolph Claydon Conservation Area. Further comment noting that, despite the presence of screening, the contribution of setting to the east can be appreciated and that the Proposed Development (particularly the Solar PV and Main Collector Compound) would compound intrusion in this view, together with existing infrastructure. Further comment that the Proposed Development would give rise to less than substantial harm at the lower end of the scale.	The Applicant welcomes agreement that the harm to the significance of Botolph House is at the lower end of less than substantial harm, as reported in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . This asset had been deleted from ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] in error and the update at Deadline 2 restores it.	On further detailed consideration, the Council considers that the harm is in the middle of the scale of less than substantial harm. See the Council's Response in 4.17 below.
4.10	4.5.10 and 4.5.11	Comment noting potential harm to the significance of Botolph Claydon Conservation Area. Comment noting that such harm would arise to views within the Conservation area but also on approach to the Conservation Area. Further comment noting that the landscape would be increasingly dominated by energy infrastructure and that the Buckinghamshire Council consider the impact to arise to be of less than substantial harm, at the middle to upper end of this scale.	The Applicant disagrees and considers that the level of harm reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] correctly reflects the level of harm to the conservation area as being within the lower half of the scale of less than substantial.	Botolph Claydon Conservation Area sits on a prominent ridge and is visible across the valleys to its south east and east. These views and views out in these directions, form important contributory elements of its setting. There are views out of the village from St Mary's Road and from the many buildings in the conservation area which take in the valley and hills and settlements beyond to the east and south, and which would be impacted. Buckinghamshire Council consider these impacts to be at least at the middle of the scale of less than substantial harm.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.11	4.5.12	Comment stating that, with regard for the historic environment, the Proposed Development would harm the character of the historic landscape. Further comment stating that whilst the field patterns will remain discernible, the Proposed Development would transform the character of the enclosed land from one of historic villages, a country house and park with its agricultural estate of satellite farms into one dominated by energy and transport infrastructure.	<p>The Applicant acknowledges within ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] that the change to the landscape character within the Order Limits would be significant. However, the Applicant respectfully disagrees with the suggestion that the effects would be industrialising, as noted at paragraph 3.3.38 of the Outline LEMP [EN010158/APP/7.6.3], which states that "New structural planting, in the form of tree belts and hedgerows, will help to soften and screen built development and integrate it to the existing landscape". As a</p> <p>result of the offsets that have been incorporated into the Proposed Development, ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] confirms that the development would not result in likely significant visual effects on the residents. As set out within the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] in all Parcels, the mass of Solar PV development would be frequently broken up by breaks in Solar PV development, areas of mitigation and wide grass strips. This would help maintain a connection with the rural context of the landscape, combining agrarian characteristics with those of a solar farm. As a result, the Solar PV development would not be oppressive or overbearing within the landscape.</p>	<p>The comment in the Historic Environment section of the LIR refers to historic character, rather than general Landscape character. The height and angular nature of the arrays and those of the BESS, and collector compounds contrast with the historic agricultural and parkland nature of the landscape.</p> <p>Although design and mitigation have introduced some screening and arrays have been broken up into blocks with spaces around them, the screening is not universal and the solar farm blocks would be easily read as a solar farm rather than agricultural fields.</p> <p>These contrast with the historic character of the settings of the heritage assets.</p>
4.13	4.5.14	Comment stating that the location of BESS in Fields D8 and D9 remains harmful to the setting and approaches to the Botolph Claydon conservation area.	<p>The response to paragraphs 4.2.19 and 4.2.25 of the LIR, the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Appendix 1: Letter to Buckinghamshire Council on BESS Locations of this document detail a number of reasons why the proposed BESS has been located within Fields D8 and D9. This includes that Fields D8 and D9 are some of the larger, flatter and lowest lying fields within Parcel 2, meaning that the BESS would be set down into the landscape when viewed from the east and south which would reduce its prominence on the skyline and reduce the effect on Middle Claydon Conservation Area. As detailed within the Outline LEMP [EN010158/APP/7.6.3] and Works Plans [EN010158/APP/2.3.3] [REP1-005] the siting zone for the BESS has been offset from the PRow ECL/7/2 that forms the southern approach to Botolph Claydon in order to reduce the effect of the BESS in this part of the setting of the Conservation Area.</p>	<p>The Council notes the reasons for locating the BESS in the proposed location, but maintains that this would result in harm to Botolph Claydon Conservation Area.</p>
4.14	4.5.15	Comment stating that there is the potential for more effective landscape mitigation measures to be implemented to soften	<p>The Outline LEMP [EN010158/APP/7.6.3], and Works Plans [EN010158/APP/2.3.3] [REP1-005] set out current</p>	<p>Exploration of the possibility of increased screening on the sides of the scheme facing away from Botolph Claydon to better screen longer views from the higher ground to east</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		the impact of the Proposed Development on the setting or heritage assets.	proposals for landscape mitigation measures included increasing the height and density of existing hedgerows, new hedgerow and tree belt planting. As detailed in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] , the Proposed Development includes embedded mitigation measures to soften the impact of the Proposed Development which includes appropriate offsets from local settlements and dwellings (including the conservation areas and listed buildings). Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] secures that the detailed Landscape and Ecological Management Plan will be submitted to and approved by the relevant planning authority, in consultation with the Environment Agency and Natural England. The Applicant is open to ongoing discussions with Buckinghamshire Council regarding appropriate mitigation measures.	and south east would be welcomed by the Council.
4.15	4.5.16 to 4.5.44	Comments noting the planning policy backdrop which frames the policy compliance assessment of the proposed development with specific reference to NPS EN-1 (2023), NPS EN-3 (2023), the NPPF (2024), NPPG and the Vale of Aylesbury Local Plan (2013-2033).	Through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016], the Applicant has provided an assessment of the Proposed Development against each of the referenced planning policies. The assessment within Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the Proposed Development accords with all those planning policies referenced within Paragraphs 4.5.16 to 4.4.44 the LIR.	The assessment does not describe the contribution of setting to the significance of heritage assets in sufficient detail in every case. The way in which especially buildings, their architecture and location were designed to interact with their surroundings historically, both functionally and aesthetically, is sometimes not addressed, leading to differences in interpretation of the impact/harm between the Council and the applicant.
4.16	4.5.45	Comments noting Buckinghamshire Council's significant concerns with the assessment of impact on the historic environment presented within the Cultural Heritage Chapter. Further comment noting concern with the baseline assessment and stating that overall harm was overall is underreported.	The Applicant maintains that the assessment presented within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] is robust and proportionate to the significance of the heritage assets and the likely harm to this significance in accordance with NPS EN-1, NPS EN-3 and NPPF (see also the Policy Compliance Assessment Tables at Appendix 4 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]).	See comment 4.15 above
4.17	4.5.46, 4.5.47 and 4.5.57	Comment that the assessments of significance in the Cultural Heritage Chapter are sometimes too high-level and lacking sufficient supporting baseline evidence. Further comment that limited consideration has been had for historic and visual and associative relationships and the ways in which the architecture of these buildings relate to their setting. Further comment noting that the assessment of settings contributions is missed in instances and this provides	ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] should be read in combination with the detailed assessments presented within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] . The assets included in the detailed assessment were agreed with Buckinghamshire Council, this includes Botolph House, Pond Farmhouse, Dry Leys	The Council consider that some of the detailed assessments in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] lack sufficient detail, especially in relation to the architecture of the heritage assets, their significance and how various aspects of their settings contribute to their significance. For example in relation to Botolph House The Council considers the significance of the

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		<p>only a partial understanding of the contribution of setting to the significance of an asset.</p> <p>An example to the above is provided for in Paragraph 4.5.47 of the LIR, which notes assets Botolph House (1212143), Pond Farmhouse (1214849) and Dry Leys Farmhouse (1319271). Further examples are provided for in Paragraph 4.5.57 of the LIR and include consideration of Rosehill Farmhouse and Blackmoorhill Farmhouse.</p>	<p>Farmhouse, Rosehill Farmhouse and Blackmoorhill Farmhouse. The detailed setting assessment includes consideration of how setting contributes to the significance of the assets. The "polite" design of Botolph House is recognised within paragraph 2.3.1-2 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] where the symmetry and aesthetic value of the building and its importance as a key building within the Conservation Area is acknowledged. The Applicant respectfully disagrees with the assertion that views out from or distant views towards Botolph House contribute to its significance to any great degree due to the presence of a tall hedge forming the garden boundary and further mature trees on the opposite side of the road. Glimpsed views of the Proposed Development filtered through the vegetation are acknowledged in paragraph 2.3.3 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and less than substantial harm to the significance of the listed building (at the lower end of this scale) is recognised in paragraph 2.3.4 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The negligible impact to the significance of the building is reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and will result in a slight effect which is not significant.</p> <p>The contribution that the surrounding agricultural land makes to the significance of Pond Farmhouse, including the field pattern, land use and connection with Claydon House is recognised within paragraph 2.26.1-2 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2], though the connection is noted as not being visually apparent due to a lack of intervisibility. The impact of the Proposed Development is acknowledged to result in less than substantial harm (within the middle of this range) at paragraph 2.26.4 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] judges this to be a moderate impact resulting in an effect of moderate significance. This effect is acknowledged to be significant.</p> <p>The contribution of setting to the significance of Dry Leys</p>	<p>Botolph House and its architecture has not been considered in sufficient detail, to identify the contribution of setting to its significance adequately.</p> <p>In relation to the significance of the main house, Section 2.3 Annex D, Detailed of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] just says: "Its symmetrical design gives it aesthetic value and it forms an attractive building within East Claydon... Botolph House is a key building within Botolph Claydon, set within a small garden... The gardens provide an appropriate context to appreciate the architectural interest of the house. Views from the house over the surrounding fields are filtered by mature trees and make a small contribution to the significance of the building as part of the rural settlement."</p> <p>The assessment misses the nature of the architecture and its original design intent and thus does not enable a full understanding of its original setting, part of which survives. Botolph House is a classical house. Its c.1712 date means that it was built before the informal house (such as the south front of Claydon House) became fashionable towards the middle of the 18th century. The principal floor would have been the first floor (a feature of classical architecture that continued for some time). The house would have been designed symmetrically to be highly visible and to project the status and of the owner in the landscape and to wider society. This is why it displays the studied classical detailing on its front elevation (to demonstrate what was considered refined, educated taste). The formal classicism and grandeur of the building (and its owner) would have been intended to dominate Botyl Road and dominate the countryside below, to the east, as well as to the rear, which explains why the building is set relatively far forward in its plot. The tall trees and hedge in front of the two main elevations (front and back) would have appeared later, when tastes changed. What survives of the legibility of the building's original setting contributes strongly to its significance. The hedge in front of the building and trees opposite it do not prevent views from the first floor northernmost windows on the principal, east elevation of the building into the valley to fields E21, E22 and E23, and possibly part of E20, in Parcel 3, where the main collector compound, Rosefield Substation and PV arrays are proposed. There is a gap in the screening trees to the north of the pond opposite, that appears to allow these views due east. There is a grassed, publicly accessible space opposite the building, north of the pond and trees, where these historic relationships remain legible and can be appreciated. The surviving views across the valley are what survives of these historically wider views and make an important contribution to the building's significance. We disagree with conclusion of slight effect, which we assume has resulted from an over cursory assessment of the contribution of setting to significance.</p> <p>The Council's view on the setting impacts to Blackmoorhill Farmhouse (Winter's tale), Rosefield Farmhouse and Pond Farmhouse mostly do not relate to direct views to and from the asset, but to the historic associations the farmhouses and farms, views of the assets (for instance, there are views from the bank and bridge on Addison Road that also include the frontage of Claydon House) farms and appreciation of the change in character of the approach roads and in their wider relationships with each other and with Claydon House.</p>

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			<p>Farmhouse is also acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] at paragraphs 2.19-1-4. The Applicant recognises that there would be an effect of neutral significance to this asset during construction and decommissioning and slight significance during operation within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2].</p> <p>The Applicant has recognised the contribution that the connection with Claydon makes to the significance of both Rosehill Farmhouse and Blackmoorhill Farmhouse within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] (paragraphs 2.28.1-4 and 2.14.1-4 respectively). This connection will not be altered by the Proposed Development which will be located south of Calvert Road and not within the line of sight between the farmhouses and Claydon House which is approximately east-west. ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] Viewpoint 6 (Winter's Tale Farmhouse / Wedding Venue) is taken from outside the Blackmoorhill Farmhouse listed building and shows that the Proposed Development will be largely screened by topography and vegetation in views south from the farmhouse. The Applicant has considered within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] that there would be negligible impacts to these assets, resulting in effects of neutral significance.</p> <p>The level of detail in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] is considered proportionate and appropriate to the effects of the Proposed Development and provides a robust baseline for the assessment in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2].</p>	
4.18	4.5.48	<p>Comment that without assessment of the spatial and historic relationships between heritage assets and their wider associated landscape, the assets have been siloed in their assessment and this presents an omission in assessment.</p>	<p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] recognises, through Section 9.18, the relevant NPS EN-1 (2023) paragraphs and Policy BE1 of the Vale of Aylesbury Local Plan. These heritage-related policies make clear that a 'heritage asset' can constitute, for example but not limited to, buildings, areas or landscapes. Furthermore, the Applicant recognises, in line with policy,</p>	<p>The heritage assets in the case of Claydon House and nearby listed buildings, its wider parkland and satellite farmhouses contribute to one another's setting and significance. Where there is group value shared by several heritage assets, the relevant elements of setting that contribute to significance should be assessed.</p> <p>For each heritage asset the contribution of the wider setting forms part of its significance.</p> <p>The assessment in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment</p>

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			<p>that a heritage asset's significance derives from the sum of its interests and, therefore, the joint consideration of its physical presence and setting. ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] has been prepared and supports ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] in establishing the significance of any affected heritage assets, considering any settings contributions. Furthermore, the key planning policy tests established within the NPPF deal only with impacts or harms to individual affected assets and so the assessment of assets in turn, as undertaken by the Applicant, is policy compliant.</p> <p>The spatial and historic relationships between heritage assets and their wider associated landscape and how these contribute to significance are detailed within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The assets included for detailed assessment were agreed with Buckinghamshire Council and Historic England.</p>	<p>and Setting Assessment [EN010158/APP/6.4.2], omits some contributory elements of setting of individual assets, as stated in the LIR.</p>
4.19	4.5.48	Comment that the assessment does not meet the policy tests in National or Local Policy.	The Applicant respectfully disagrees. Further to the discussion in the row directly above, the Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) sets out how the Proposed Development and assessment of potential cultural heritage effects complies with and meets the relevant cultural heritage policies at both the national and local level	The Council maintains that the ES analysis contribution of elements of setting to significance does not take adequate account of the exact nature of the heritage asset. ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]
4.20	4.5.50	Comment stating that the historic landscape character within the Order Limits is dominated by the presence of regular and irregular enclosures predating the 18th century. Further comment that the historic fieldscape was therefore largely in place at the time the Claydon House and Park was established and that the fieldscape continues to reflect the land use character largely as it was shaped in the 18th century.	<p>ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] includes consideration of both physical impacts and changes to the setting of the post-medieval field systems.</p> <p>The fieldscape within the Order Limits will remain one of regular and irregular enclosures as only limited areas of hedgerow removal are proposed between Fields E11 and E20 for construction of the Rosefield Substation and potential removal of a section of hedgerow to facilitate the Interconnecting Cable Corridor between Parcel 1 and Parcel 2. Land use within the fields will change for the duration of the operational life of the Proposed Development but can be returned back to agriculture on decommissioning. This is acknowledged in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] to</p>	No further comment other than that some of the mitigatory planting will obscure relationships within this 18 th and earlier landscape.

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			<p>represent a moderate magnitude of impact on the non-designated heritage asset and to result in a slight adverse effect which is not significant.</p>	
4.21	4.5.52	<p>Comment stating that solar PV will be visible in views from Knowl Hill towards Claydon House and that, whilst not obstructing, the Proposed Development will introduce energy infrastructure into this view.</p>	<p>The introduction of energy infrastructure into the view from Knowl Hill has been acknowledged within the assessment of Claydon House as presented in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and is shown in Illustration 1 of Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The Applicant has concluded that the effect of this, along with other changes to the setting and experience of Claydon House will result in less than substantial harm and would sit within the lower end of this scale of harm. The Applicant proposes a permissive path to Knowl Hill along with interpretation boards to enable views of Claydon House from Knowl Hill to be appreciated by the public and to increase public understanding of the designed landscape around Claydon. The permissive path and interpretation board(s) are secured through the Outline LEMP [EN010158/APP/7.6.3],</p>	<p>The Council's conclusion that harm would be in the middle of the scale of less than substantial harm includes the view from Knowl Hill, Claydon House's presence in the wider landscape and the interruption of Claydon House's relationships with Pond Farmhouse and other landscape features, along with cumulative harm from the presence of modern infrastructure from the proposals and already consented and built schemes on the approach routes, altering the character of its setting.</p>
4.22	4.5.53	<p>Comment stating that the Proposed Development will alter the historic landscape character of the wider estate landscape to the south of Orchard Way, diminishing its contribution to the significance of Claydon House, Claydon Park, and Middle Claydon Conservation Area as part of the picturesque and agricultural setting of the designed landscape and country house. Further comment stating that the Proposed Development impacts the landscape by introducing energy infrastructure in the fieldscape and establishing an infrastructure dominated landscape which diminishes understanding of the estate landscape and the historic connection between these assets and surrounding estate farms such as Pond Farmhouse, Blackmoorhill Farmhouse and Rosefield Farmhouse.</p>	<p>The effect of changes to the character of the wider estate landscape is acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] which concludes that the harm to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area will be negligible. The picturesque views from Claydon House will be altered by the presence of Solar PV modules and the Satellite Collector Compound within Parcel 1 but the Applicant has minimised these effects by removing potential for Solar PV from Field B17 (Knowl Hill), constraining the siting zone for the Satellite Collector Compound in Parcel 1 and proposing additional planting along Three Points Lane to provide additional screening without interrupting the designed view from Claydon House to Knowl Hill.</p>	<p>The Council notes the response, welcomes the mitigation, but disagrees on the resulting residual harm.</p>

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			<p>Please see the Applicant's response above to paragraph 4.5.3 of the LIR for more detail on the effect of the Proposed Development on the relationship between Claydon House, Claydon Park and Middle Claydon Conservation Area and surrounding estate farms.</p>	
4.24	4.5.55	<p>Comment that the cumulative impacts of development in the locale will result in harm to the unique sense of place which contributes to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area. Further comment that such harms are in conflict with Paragraph 5.9.25 of NPS EN-1 and VALP Policy BE1.</p>	<p>As noted above in response to paragraph 4.5.3 of the LIR, other nearby solar and infrastructure projects have been considered within ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. The closest project included in the shortlist of cumulative developments is the proposed National Grid East Claydon Substation which would be co-located within the Order Limits of the Proposed Development. The siting zone for the National Grid East Claydon Substation is c. 1.6km east of Claydon Park beyond East Claydon village. It has been assessed to lie outside the setting of Claydon House, Claydon Park and Middle Claydon Conservation Area and therefore no cumulative impact is predicted to these assets. Other infrastructure projects are likewise considered not to cumulatively impact on the significance of Claydon House, Claydon Park or Middle Claydon Conservation Area as they lie outside of the setting of these assets.</p> <p>The Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) provide assessment of the Proposed Development against Paragraph 5.9.25 of NPS EN-1 (2023) and Vale of Aylesbury Local Plan Policy BE1. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the mitigation measures that have been designed into the Proposed Development accord with the conservation objectives of these policies.</p>	<p>The Council's opinion is that the quantum of infrastructure on the approaches to Claydon House would cumulatively alter their nature.</p>
4.25	4.5.56 and 4.5.57	<p>Comment stating that Buckinghamshire Council agree with the Applicant's assessment of harm on Pond Farmhouse but that the nature of the impact has not been accurately established within the Cultural Heritage Chapter. Further comment that the Proposed Development will industrialise the setting of the farmhouse. Further comment noting the contributions of mitigation but that intervisibility will remain from the upper floors of the farmhouse.</p> <p>Further comment that the setting will be further diminished</p>	<p>The Applicant welcomes the agreement that the harm to Pond Farmhouse is less than substantial. The assessment with ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D of ES Volume, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] has appropriately and accurately detailed the nature of the impact. The Applicant has acknowledged the impact of the Proposed Development surrounding Pond Farmhouse and on the setting of the farmhouse and has sought to</p>	<p>Additional screening will further sever Pond Farmhouse's relationship with Claydon House and Park.</p> <p>See previous comments on Rosehill Farmhouse and Blackmoorhill Farmhouse.</p>

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		<p>by the proximate HS2 development which will detract from the agricultural character surrounding the Rosehill Farmhouse, Blackmoorhill Farmhouse and Pond Farmhouse. Further comment that the presence of HS2 and East West Rail, together with the Proposed Development, will surround the farmhouses on three sides with infrastructure.</p>	<p>minimise the effect by removing Solar PV modules and other infrastructure from Field B5 to the north and Field B13A to the east of the farmhouse. The Applicant respectfully disagrees with the assertion that views of Pond Farmhouse from Calvert Road make any substantive contribution to the significance of either the farmhouse or Claydon House as the existing hedgerow vegetation provides effective screening except at the access point (as illustrated in ES Volume 4, Appendix 10.6:</p> <p>LVIA Visualisations [EN010158/APP/6.4.3] Viewpoint 1b Calvert Cottages) where parts of the farmhouse are visible above hedgerow surrounding its garden. As noted above, HS2 is located c.700m southwest of Pond Farmhouse at its closest point and mitigation planting for HS2 would serve to screen it from view whilst East West Rail lies over 1km north of Pond Farmhouse and follows the route of the former Oxford and Bletchley Branch of the London and North West Railway (as illustrated on the 1st Edition Ordnance Survey map presented within ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]). The Applicant respectfully disagrees with the statement considers that the change to the setting of Pond Farm as a result of these two developments in combination with the Proposed Development would not increase the moderate magnitude impact during operation of the Proposed Development and moderate significance of effect on Pond Farmhouse.</p> <p>As noted in the response to LIR paragraph 4.5.57, the impact of the Proposed Development on the significance of Rosehill Farmhouse and Blackmoorhill Farmhouse would be negligible and the effects would be neutral significance. The distances to HS2 and East West Rail from these listed buildings mean that they will retain agricultural land around them, and they will continue to be experienced as historic farmsteads within an agricultural estate, any cumulative impact would therefore also be negligible.</p>	

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4.26	4.5.58	<p>Comment stating that the tower of St Mary's Church (grade II* listed building, 1289625) would have been visible from across the valley to the east and south east. In the winter it would be visible over elements of the solar farm in views from further east and south east (for example from Viewpoint 27). This would cause less than substantial harm to the church at the low to middle end of the scale.</p>	<p>Viewpoint 27 (ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3]) illustrates that the Proposed Development will not compete with the prominence of the church due to its location on higher ground and as such the Applicant considers that there would be harm at the lower end of less than substantial as reported within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] and that this harm would equate to an impact of negligible magnitude and a slight adverse effect which would be not significant. This is reported within the updated ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] submitted at Deadline 2.</p>	<p>The views would be impaired rather than obstructed and the contrast of proposed arrays and structures with the church and its location would compete and intrude on the historically associative and visual setting of the church, which is largely unaltered, except for the solar farm infrastructure previously built, which has harmed the setting. Further infrastructure would increase the amount of harm.</p> <p>The proposed solar farm would interpose in the views between the ridgetop villages of East Claydon and Botolph Claydon, and the opposing hilltop villages of Granborough and North Marston. These historic setting relationships would be harmed. St Mary's church and its curtilage trees mark the location and presence of East Claydon (being considered as a conservation area) in these views and the location of the proposed solar farm structures forms an important element in the village's and Church's setting.</p> <p>The Council maintain that the harm to St Mary's Church would be in the middle of the scale of less than substantial harm.</p>
4.27	4.5.59	<p>Comment stating that the Proposed Development would compound intrusion in the views from/to Botolph House (grade II* listed building, 1212143) resulting from the existing presence of existing pylons, due to the introduction of additional large-scale energy infrastructure. Further comment that the settings assessment does not identify the contribution to significance of views from the building across the Vale of Aylesbury or assess the impact upon significance resulting from changes to this view.</p>	<p>The setting assessment of Botolph House presented in Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] states "Views from the house over the surrounding fields are filtered by mature trees and make a small contribution to the significance of the building as part of the rural settlement." Likewise, views of Botolph House from the surrounding area are filtered by this vegetation and with the exception of close range views from Botyl Road do not contribute to its significance. Visibility of the Proposed Development from Botolph House will therefore be filtered by existing vegetation and the effect on Botolph House of the Proposed Development in combination with the existing pylons and substation would be slight adverse and not significant, as reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2].</p> <p>Although taken from further north than Botolph House, Viewpoint 13 in ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3] shows a similar view across the Vale of Aylesbury to that experienced from the gap in the hedgerow opposite the northern corner of Botolph House. ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] notes that the view east is "across fields gently descending to within the Claydon Vale...[and that] some agricultural buildings are visible as is the settlement of Granborough on rising land to the east. A prominent line of pylons traverses the view in a broadly southerly direction". It goes on to state that construction/decommissioning activity would be visible in Fields E11 and E20- 23 approximately 950m to the east</p>	<p>See response 4.17 for the Council's view on the harm to Botolph House.</p>

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			<p>and that during operation Solar PV development in Fields E21 and E23, the Main Collector Compound in Field E22 and Rosefield Substation in Fields E11 and E20 would be visible in the context of existing pylons, mitigation planting would partially screen and soften these views from Year 10.</p> <p>Views of the higher ground east of the Vale would therefore not be obstructed but new development would be visible on the lower lying ground. The setting assessment concludes that the filtered views of the Solar PV development, Rosefield Substation and Main Collector Compound will have a negligible impact on the significance of Botolph House, representing harm at the lower end of less than substantial harm and a slight adverse effect which is not significant.</p>	
4.28	4.5.61	<p>Comment stating that the Proposed Development (solar PV and BESS) would create an industrial presence to approaches to Botolph Claydon. Further comment stating that there is an overall change in setting from a historic agricultural landscape to a power-generation landscape which harms the Botolph Claydon Conservation Area's rural character and degrades the contribution of setting to its significance.</p>	<p>As set out in the response to paragraphs 4.4.3 and 4.4.68 of the LIR above, whilst ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] acknowledges that there would be a significant change to the landscape character within the Order Limits, However, as set out in the response to paragraph 4.5.63 and 4.5.64 of the LIR below, the Applicant respectfully disagrees that there would be an industrialising effect on the landscape character. ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] concludes that the change in the wider agricultural surroundings of Botolph Claydon would result in a low level of less than substantial harm. This is because the heritage significance of the Conservation Area does not just derive from the landscape character of its setting but also from elements such as individual buildings (both listed and non-designated) and spaces within the Conservation Area which provide its character and appearance. There will be no physical change to the Conservation Area and therefore the impact on its heritage significance of altering the character of its surroundings will be less than the impact on the landscape character of those surroundings themselves.</p>	<p>The Council agrees that the significance of Botolph Claydon Conservation Area is multifaceted. However, setting makes a strong contribution to its significance, especially given that it is visually dominant hill/ridgetop village that is very widely visible (the ridge/hill top location is not mentioned in the section 2.33 of Applicant's detailed setting assessment in ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The most dramatic element of its setting is to the south, south east and east, and the character of these elements would be altered. The fields on the approaches along Orchard Way and on paths to south west corner of the conservation area would also pass by extensive features of the solar farm, so power-generation would be a presence in a large proportion of the conservation area's setting.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.29	4.5.62 and 4.5.63	Comment stating that Buckinghamshire Council remains concerned about the loss of agricultural land use character across this area which contributes to the understanding of the Botolph Claydon Conservation Area as a historic agricultural village. Further comment that development in Parcel 3 will impact the setting of the conservation area.	The contribution of the agricultural land use character to the significance of the Botolph Claydon Conservation Area is acknowledged within Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]). The Applicant considers that the harm to the significance of the conservation area as a result of the presence of the Proposed Development within this setting would be at the lower end of less than substantial harm.	The Council disagrees on the level of harm.
4.30	4.5.63 and 4.5.64	Comment stating that the Proposed Development would also be visible in long views towards the Botolph Claydon Conservation Area from the east across the Vale above and between hedgerows lining the roads. The presence of the Proposed Development would compound intrusion in these views resulting from the presence of existing pylons, due to the introduction of additional large-scale energy infrastructure, industrialising the landscape and conflicting with its established visual rural character, adversely impacting the significance of the conservation area. Further comment stating that the relevant assessment does not comply with NPS EN-1.	<p>The Applicant respectfully disagrees that there would be an industrialising effect on the landscape as a result of the Proposed Development after mitigation. The Design Approach Document [EN010158/APP/5.8.2] [REP1- 018] details the embedded mitigation measures that form part of the Proposed Development to soften the impact which includes offsets from the local villages (including Botolph Claydon and East Claydon) to minimise the impact on their character, management of hedgerows to increase their height, infill gaps and ensure their longevity to soften views of the Proposed Development and discounting Solar PV development from specific fields within the Order Limits to break up the amount of development along footpaths. In Parcel 2, the Bernwood Jubilee Way would have a larger offset of 55m from the proposed Solar PV development to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context. In Parcel 3, the Mid Shires Way and North Bucks Way would have a larger offset of 30m from the proposed Solar PV development to allow greater separation from the Proposed Development.</p> <p>The Applicant considers that the embedded and proposed mitigation measures would result in less than substantial harm (at the lower end) to the significance of the Botolph Claydon Conservation Area.</p> <p>The Applicant respectfully disagrees with the comment that the Proposed Development does not comply with the relevant policies written into NPS EN-1 (2023). The Planning Statement [EN010158/APP/5.7.3] [REP1-016] and Appendix 4 (Policy Compliance Assessment Tables) set out how the Proposed Development and the relevant assessment of potential effects on cultural heritage receptors complies with the relevant cultural heritage policies established within NPS EN-1 (2023).</p>	See comments above on 4.10, 4.26 and 4.28.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.31	4.5.66	<p>Comment stating that the Proposed Development will transform the character of the historic landscape within the Order Limits, ending its historic use as a working historic agricultural fieldscape and will ultimately result in harm. Further comment that, when considered in combination with surrounding developments such as HS2, East West Rail, and other energy schemes such as Tuckey Solar Farm, the Proposed Development will have resulted in the progressive, piecemeal erosion of historic landscape character with the large-scale presence of energy and transport infrastructure degrading the significance of a historic agricultural estate.</p>	<p>As set out in the response to paragraph 4.5.63 of the LIR above, the Applicant respectfully disagrees that the Proposed Development would result in any more than low levels of less than substantial harm to the surrounding historic environment character. The Proposed Development would introduce solar PV development into fields currently in agricultural use but the only long term loss of agricultural land use would be within the area of the Rosefield Substation and BESS. The Collector Compounds would have the appearance of agricultural buildings and the Outline LEMP [EN010158/APP/7.6.3] includes for areas of grazing under and around the Solar PV.</p>	<p>The visual impact on the agricultural fields would introduce harm to setting and significance. For the effects on long term agricultural usability please refer to the council's soil specialist.</p>
Adequacy of Mitigation				
4.33	4.5.51	<p>Comment noting that the Applicant's removal of solar PV from the slopes of Knowl Hill and reinforcement of the poplar avenue along Three Points Lane will reduce visual intrusion to and from Claydon House and Park. Further comment stating that Buckinghamshire Council remain concerned by settings impacts on Claydon House, Claydon Park, and Middle Claydon Conservation Area. Further comment noting that they consider the Applicant's assessment of impacts on these assets to be poorly founded.</p>	<p>The Applicant respectfully disagrees that the assessment of impacts on Claydon House, Claydon Park and Middle Claydon Conservation area is poorly founded. The assessment of these assets has followed Historic England guidance and the level of harm to Claydon House has been agreed with Historic England and National Trust and the level of harm to Claydon Park has been agreed with National Trust, this agreement is detailed within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] and Statement of Common Ground with National Trust [EN010158/APP/5.17] submitted at Deadline 2. Historic England defer to Buckinghamshire Council on the Middle Claydon Conservation Area but it should be noted that Middle Claydon Conservation Area covers largely the same area as Claydon Park with the addition of an area of houses to the north of the park.</p> <p>The Applicant welcomes the agreement that removal of Solar PV development from the slopes of Knowl Hill will reduce visual intrusion to and from Claydon House and Park. The Applicant maintains that the harm to the significance of Claydon House, Claydon Park and Middle Claydon Conservation Area would be at the lower end of less than substantial as reported within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2].</p>	<p>The mitigation is welcome, but the Council maintain that there would still be harm to significance in the middle of the scale of less than substantial harm as assessed in the LIR and as discussed in responses 4.10, 4.26 and 4.28 above. Without the mitigation the harm would be likely to be more significant.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
4.34	4.5.51	Comment that more accurate assessments may assist with the refining of mitigation and that it is noted that the Applicant is proposing additional visualisations from Claydon House's principal upper floor rooms.	<p>The Applicant used a virtual 3D model of the Proposed Development to assess the effects from areas of Claydon House that were not accessible at the time of the assessment. Visualisations from the upper floor rooms of Claydon House have been submitted at Deadline 2 (ES Volume 3, Figure 10.6: Viewpoint locations [EN010158/APP/6.3] [APP-069]). These visualisations show that the 3D model overestimated visibility of the Proposed Development from Claydon House, meaning that the conclusions drawn were robust. The visualisations have been shared with Buckinghamshire Council, Historic England and National Trust. The visualisations show that the proposed planting within Parcel 1 would act as effective screening for the Solar PV modules and Satellite Collector Compound from Claydon House. They also show that there would not be visibility of Solar PV modules beyond Knowl Hill (as assessed based on the 3D model used for the assessment) and therefore the visual intrusion into the view would be less than reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] and Annex D ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]. The Applicant considers that the harm to the significance of Claydon House would remain as reported in ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] [APP-052] and Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2], that is a low level of less than substantial harm equating to an impact of minor magnitude and slight adverse effect which is not significant.</p>	<p>The use of the 3D model is an appropriate and welcome tool in establishing the visual impacts. The Council identifies the issue with the accuracy of the assessment to relate to the analysis of the contribution of the wider setting to the significance of Claydon House, its park (both within and outside the registered park and conservation area boundaries) and constituent heritage assets.</p>
4.35	4.5.55	Comment noting the Applicant's incorporation of mitigation measures but stating that these measures do not address the impact of homogenisation of the setting of Claydon House and Park resulting from the introduction of the repetitive, geometric forms of the solar arrays, and the resulting harm to landscape legibility across its setting	<p>As set out within the response to paragraph 4.5.3 of the LIR above the Applicant respectfully disagrees that the Proposed Development would result in homogenisation of the setting of Claydon House and Park. The new hedgerow and woodland planting as shown and secured in the Outline LEMP [EN010158/APP/7.6.3], and by Requirement 7 of the Draft DCO [EN010158/APP/3.1.4] will break up the appearance of the Solar PV development and provide screening of the Proposed Development in views from Claydon House and Park and from the approaches both by road and by PRoW. The legibility of the landscape around Claydon House and Park and the contribution that it makes to the significance of the designated heritage assets will therefore be largely retained. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] deals more fully with the effects on the landscape character and</p>	<p>The solar farm infrastructure would be broken up by the planting, which is welcome. However, it would occupy a large number of fields and remain highly legible and extensive in the landscape. It would appear extensively in the setting of Claydon House and interrupt or intrude on its wider relationships.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			concludes that there would be significant effects within the Order Limits.	

Table 3-5: Cumulative Effects

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Cumulative Effects from the Proposed Development and Other Projects				
5.1	4.16.2	<p>Comment noting Buckinghamshire Council remain significantly concerned about the cumulative effects of the Proposed Development, including in respect of these issues, which principally relate to landscape and ecological matters. Further comment that there is a notable absence of consideration of other topics previously highlighted as important in this context, including heritage and human health matters.</p> <p>Buckinghamshire Council considers that, currently, there is insufficient clarity about how the mitigation measures for cumulative impacts will be effective in addressing the full range of likely significant cumulative effects, and further detail on scope and implementation is sought.</p>	<p>The cumulative assessment in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] considers all environmental topics, including cultural heritage and population, which are presented in Tables 17.4 and 17.5. These tables demonstrate that each topic was systematically assessed for potential cumulative effects, with several heritage and human health receptors carried forward to Stage 2 for detailed consideration.</p> <p>Where such receptors were assessed in Stage 2 (Tables 17.6 and 17.7), it was concluded that all resulting cumulative effects were not significant once the standard topic specific mitigation measures were applied. As no significant cumulative effects were identified for any topic, no additional cumulative-specific mitigation has been proposed. Nevertheless, all relevant mitigation set out in the ES topic chapters is secured through the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline LEMP [EN010158/APP/7.6.3] and Design Commitments [EN010158/APP/5.9.4], both secured as Requirements in the DCO [EN010158/APP/3.1.4].</p> <p>In addition to the mitigation measures, the Proposed Development incorporates a range of embedded design measures intended to avoid and/or reduce significant cumulative effects through the placement of infrastructure. These measures are secured within the Design Commitments [EN010158/APP/5.9.4].</p>	<p>The Council does not agree that the Applicant's cumulative effects assessment for the Bechstein's bat population. The Environmental Statement identifies the bat population as nationally important, yet characterises effects as local or district in scale.</p> <p>The assessment relies on mitigation associated with HS2, Calvert Solar Farm and East West Rail without evidence of effectiveness. In the absence of monitoring data confirming that these measures function as intended, it is not appropriate to assume they will offset impacts. A precautionary approach should be applied.</p> <p>The assessment does not fully reflect the combined effects of multiple schemes within the core sustenance zone, including HS2, East West Rail, the Proposed Development and other energy schemes.</p> <p>Insufficient weight is given to the risk that the Proposed Development would constrain or delay habitat restoration, which forms part of the wider mitigation context for the population.</p> <p>The siting of compounds and infrastructure within key connectivity corridors would result in disturbance and fragmentation, adding to cumulative effects.</p> <p>The Council considers that likely significant cumulative effects on a nationally important bat population cannot be ruled out. The assessment relies on mitigation that is uncertain and does not fully capture the combined impact of multiple major schemes within this area. A precautionary approach indicates a clear risk of significant adverse effects beyond the local scale.</p> <p>The Council considers that the cumulative effects assessment downplays the importance of effects already identified by the Applicant with regards to landscape matters. In particular, the Bernwood Jubilee Way and other routes form part of the wider recreational network and are experienced across extended lengths.</p> <p>The combined with the identified changes in views along these routes, gives rise to effects that are important at least at a county level.</p> <p>The Environmental Statement identifies significant adverse effects on receptors including Hogshaw Farm and Wildlife Park,</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
				<p>due to changes in views across the wider visitor attraction. These effects relate directly to the rural setting and visitor experience of the site. When considered alongside other infrastructure in the area, multiple schemes are visible within the same views, altering how the attraction is experienced as a whole. The Council considers that these effects extend beyond localised visual change and are important at least at a district level, but are not given appropriate weight in the cumulative assessment.</p>
5.3	4.16.16	<p>Comment stating that the Applicant's Environmental Statement fails to recognise that cumulative effects in this location are not merely additive but compounding. Further comment noting that each further development introduces new layers of infrastructure, human activity, construction traffic, movement, noise, visual massing, lighting and land-use change, creating a downward trajectory in landscape quality and a progressive erosion of rural character. Further comment noting that introducing a large, industrial-scale BESS into this cumulative baseline would intensify and accelerate an ongoing landscape transformation from rural to industrial, fundamentally altering the experiential qualities of the area.</p>	<p>The Applicant acknowledges that, as set out in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3], there is potential for significant inter-project cumulative landscape and visual effects in combination with other developments in the area. The assessment identifies that these neighbouring schemes collectively contribute to a more complex and infrastructure-influenced baseline in parts of the surrounding area, including some elevated viewpoints. These findings are clearly reported in the chapter.</p> <p>The Proposed Development incorporates substantial embedded mitigation, including vegetative screening, careful siting of infrastructure, and minimisation of vertical massing, which limits its incremental contribution to wider cumulative change. For other environmental topics, such as noise, traffic, lighting, human health, or land-use change, the Proposed Development does not introduce additional significant cumulative effects.</p> <p>Appropriate mitigation for landscape and visual cumulative effects is secured through the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline LEMP [EN010158/APP/7.6.3], and Design Commitments [EN010158/APP/5.9.4].</p>	<p>The cumulative assessment identifies moderate to major adverse effects arising from the BESS in combination with other schemes. The Council considers that this understates its contribution to cumulative change. The BESS introduces a distinctly industrial element which, when seen and/or experienced alongside other infrastructure, reinforces the perception of multiple large-scale developments within the same landscape. These effects are important at least at a district level but are not given appropriate weight in the overall assessment.</p>
Co-ordination with Other Projects in the Vicinity				
5.8	4.16.3	<p>Comment noting concern regarding the cumulative transport implications of the Proposed Development, when considered in the context of other developments. Further comment that it is likely that multiple projects will collectively rely on common access routes and contribute to impacts on the same selection of villages and communities. Further comment noting that there is insufficient information within the Applicant's submission to satisfy Buckinghamshire Council that robust cumulative transport assessment has been undertaken and that effective mitigation is incorporated.</p>	<p>The Applicant has reviewed all relevant applications and has identified that no other schemes are proposing to use the access route from the A41 that the Proposed Development is proposing. Common projects on the A41 have been included and details are provided in ES Volume2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]. This assessment will be further monitored as the status of further schemes becomes apparent.</p> <p>Schemes to the north of the Proposed Development such as the National Grid East Claydon Substation, East Claydon BESS, East Claydon Greener Grid Park all use alternative routes to site and roads out with the study area agreed with Buckinghamshire Council.</p>	<p>CTMP requires coordination with HS2.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>The Applicant will liaise with other developers on joint traffic management matters and has signed a Statement of Common Ground to that effect with HS2 for example (Draft Statement of Common Ground with High Speed 2 Limited [EN010158/APP/5.19] [REP1-030]). This is also secured within Section 2.22 of the Outline CEMP [EN010158/APP/7.2.3].</p>	

Table 3-6 Health and Wellbeing

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Assessment Methodology Adequacy				
6.1	4.6.1	<p>Comment that as raised at the Relevant Representation stage, Buckinghamshire Council believe the Environmental Statement does not provide a clear or integrated assessment of likely significant effects on health. Further comment that they remain of the view that such work should be done, noting the ExA has invited the Applicant to do so.</p>	<p>The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, which aims to more clearly present the effects on health and wellbeing in accordance with NPS EN-1, NPS EN-3 and guidance produced by ISEP. The Applicant recognises that Buckinghamshire Council will wish to review this report and comment at subsequent deadlines, though will also be seeking to engage bilaterally on the matter, and is hopeful that the document will satisfactorily address Buckinghamshire Council's concerns. A further iteration of the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1 127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change</p>	<p>Buckinghamshire Council acknowledges that the Applicant has taken steps to respond to concerns raised at the Relevant Representation stage regarding the absence of a clear, integrated assessment of likely significant effects on health, including by producing a consolidated Health Effects Report (Annex A) to the ES Volume 4, Appendix 5.5 Health and Wellbeing Summary Statement at Deadline 1 and then updating this material at Deadline 2 [REP2-051].</p> <p>The Council notes that the Applicant has inserted a clarifying statement in the main body of the tracked Appendix 5.5 confirming that the Deadline 2 update responds to Written Representations from Claydons Solar Action Group (CSAG) [REP1-127], and that Annex A has been updated to include additional context (including GP-registered population context for the 3W Health practice) and to provide a more explicit conclusion regarding the sensitivity of relevant sub-populations (notably older people and those facing access/geographic factors) to change. The Council recognises that the Applicant presents these Deadline 2 changes as targeted to baseline context and sensitivity narrative rather than a wholesale revision of the assessment approach.</p> <p>The Council welcomes the improved clarity in principle, including the Applicant's explicit caveat that the GP-registered information is anecdotal rather than official national statistics, and the more explicit narrative that sensitivity is not uniform across the population (including clearer pathway-specific sensitivity statements relating to older people and underlying health risk factors). However, Buckinghamshire Council considers that these additions remain largely descriptive and would benefit from clearer signposting as to how sensitivity is carried through consistently into discrete receptor definition (place-based high-exposure receptors), significance judgements, and targeted mitigation/monitoring for the most affected groups.</p> <p>The Council acknowledges that the Deadline 2 update [REP2-051] partially improves the sensitivity narrative, taking account of additional information provided through [REP1-127].</p> <p>Notwithstanding the above, the Council remains of the view that the substantive matters raised previously by Buckinghamshire Council ([REP2-090], Q1.13.1 and [REP 2-092], 1.1.8 – 1.1.24 (LIR Addendum)) have not yet been addressed satisfactorily by the</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
				<p>Applicant. In summary, these comprise the need for clearer methodological signposting (including how the cited ISEP SIA in EIA guidance underpins social cohesion conclusions); improved prominence and ES-wide reporting of health conclusions (including updating the Non-Technical Summary); assurance that mitigation relied upon is fully and consistently secured within certified documents; and, critically, further avoidance and targeted mitigation to address residual significant landscape/visual and PRoW-related wellbeing effects (including cumulative effects) through a robust place-based assessment of geographically higher-exposure receptors (including the specific receptors and communities previously identified by the Council).</p>
6.2	4.6.17	<p>Comment that relevant health requirements are addressed separately across the Environmental Statement and summarised qualitatively rather than through a health lens.</p> <p>Further comment that the Health and Wellbeing Summary Statement does not set out methods, evidence or assessment needed to support a reasoned conclusion on overall significance of health effects</p>	<p>The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, intended to provide a clear assessment of the health and wellbeing effects of the Proposed Development, in-line with standard industry guidance and in accordance with the requirements of legislation and national policy. The Health Effects Report sets out methods, evidence and assessment needed to support a reasoned conclusion on overall significance of health effects.</p> <p>This has the benefit of providing a clear application of standard health guidance as an additional layer to the topic- specific methodology, in terms of the significance of health effects related to those assessments – which includes consideration (determined by ISEP guidance on assessing the significance of health and wellbeing effects) of:</p> <ul style="list-style-type: none"> • The ability to deliver current health policy and/or the ability to narrow health inequalities, as evidenced by referencing relevant policy and effect size and in the context of community feedback on the importance of effects; • Effects in the context of regulatory thresholds or statutory standards; • Potential changes in the health baseline of the population; and • Health priorities for the relevant study area. <p>The Health Effects Report includes:</p> <ul style="list-style-type: none"> • A description of the likely significant effects on health, as determined by the scope for identifying those wider determinants of health relevant to the Proposed Development, drawing on reported impact assessment from the ES, including a review of the additional mitigation related to avoiding, reducing or managing health effects that may otherwise contribute to adverse impacts on mental health and wellbeing as a result of the Proposed Development; and • An assessment of the residual effects on health, by wider determinant of 	<p>Buckinghamshire Council acknowledges the Applicant's response that it has sought to address earlier Council concerns regarding the absence of a clear health lens by producing a consolidated Health Effects Report (Annex A) to ES Volume 4, Appendix 5.5, first submitted at Deadline 1 and most recently presented as [REP2-051].</p> <p>The Council recognises that Annex A improves accessibility and audit trail compared to relying solely on dispersed topic-chapter conclusions, by bringing health-related conclusions into one location. The Council has also reviewed the Deadline 2 tracked iteration [REP2-051] and notes the Applicant's clarifying statement that the document has been updated in response to the Written Representations from Claydons Solar Action Group (CSAG) [REP1-128], and that Annex A has been updated to incorporate additional context relating to the portion of the population registered with a GP at the 3W Health practice, and to provide a more explicit conclusion on the sensitivity of relevant sub-populations (including older people and those facing access/geographic factors).</p> <p>Buckinghamshire Council welcomes, in principle, the additional baseline context and the clearer articulation that sensitivity is not uniform across the population, including the Applicant's explicit caveat that the GP-practice-derived information is anecdotal rather than official national statistics. The Council also acknowledges that the Deadline 2 iteration [REP2-051] provides more explicit narrative on sensitivity (including older people and access/geographic factors) and introduces anecdotal prevalence information (e.g. chronic conditions/respiratory-related risk factors) intended to inform that sensitivity narrative. However, the Council considers that these additions remain predominantly descriptive and need clearer signposting as to how sensitivity is carried through consistently into pathway conclusions and into any</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>health, as a result of the Proposed Development. This takes into account the sensitivity of the receptors, embedded and additional mitigation and the magnitude of change as a result, applying health-specific criteria.</p>	<p>targeted mitigation/monitoring where relevant.</p> <p>Notwithstanding the above improvements, Buckinghamshire Council does not consider that the Applicant's response fully addresses the substantive matters raised previously in relation to Annex A ([REP2-090], Q1.13.1 and [REP 2-092],1.1.8 – 1.1.24 (LIR Addendum)). In particular, the Council continues to seek: (i) clearer explanation/signposting of how cited guidance (including the ISEP Social Impact Assessment in EIA guidance referenced within Annex A) has been applied, particularly where underpinning social cohesion conclusions; (ii) improved prominence and ES-wide coherence of health reporting, including updating the Non-Technical Summary so that health conclusions and significance are consistently reported and signposted; and (iii) assurance on mitigation traceability, including review of cross-referencing where Annex A appears to describe mitigation outcomes more specifically than the underpinning outline plans and certified documents. In addition, the Council considers that the Applicant has not provided the place-based assessment and targeted mitigation focus sought for the most affected receptors and communities, particularly in relation to residual significant wellbeing effects associated with landscape/visual change (including cumulative effects) and PRoW-related effects. The Council's position remains that these spatially specific residual effects require a more explicit place-based approach that defines geographically higher-exposure receptors as discrete health receptors and then transparently carries sensitivity through into significance judgements and targeted mitigation/monitoring for those receptors.</p>
Significance of Effects				
6.3	4.6.18	<p>Comment that the Health and Wellbeing Statement does not, in its current form:</p> <ul style="list-style-type: none"> provide a consolidated Population and Health assessment; apply ISEP Health in EIA methodology; identify vulnerable groups to enable reporting on differential health effects experienced by the wider population; present health-specific significance criteria; or provide an overall judgement on likely significant health effects, through a human health lens. 	<p>While the Applicant is satisfied that an assessment of determinants and pathways to health and wellbeing effects on specific populations and sub-populations has been provided throughout the ES, the Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, intended to provide a clear assessment of the health and wellbeing effects of the Proposed Development, in-line with standard industry guidance and in accordance with the requirements of legislation and national policy.</p> <p>The Health Effects Report:</p> <ul style="list-style-type: none"> Provides a consolidated assessment of health and wellbeing effects of the Proposed Development on populations and sub-populations, drawing on assessments across the ES but also through a health lens; Explicitly applies ISEP methodology relating to the assessment of determinants/pathways, magnitude, sensitivity and significance of 	<p>Buckinghamshire Council has reviewed the tracked Deadline 2 version of Appendix 5.5 and Annex A [REP2-051]. It considers that the Applicant's description of what the Health Effects Report provides is not fully reflective of what has been produced.</p> <p>Points of acceptance</p> <p>The Council agrees that Annex A does now function as a consolidated location where health and wellbeing conclusions are drawn together from across the topic assessments and presented through an explicit determinants/pathways framing, with reporting by determinant and a summary of residual effects (including via summary tables). In that sense, the Applicant has moved beyond a purely qualitative signposting approach and there is now a clearer audit trail in one place for health-related conclusions than was available previously through dispersed topic chapters alone.</p> <p>The Council also accepts that the report sets out a health</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>potential effects on health and wellbeing;</p> <ul style="list-style-type: none"> • Identifies the sub-populations and characteristic groups and receptors more likely to experience differential or disproportionate effects on health (including driven by vulnerability to health inequality and types of effects based on their characteristics); and also provides a baseline / context for the prevalence of these sub- populations/characteristics around the Site. <ul style="list-style-type: none"> ○ The Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]) draws conclusions based on a consideration of the baseline using national statistics and public health data at a ward level. In most cases, self-reported health, health outcome metrics, metrics for risk factors and wider determinants are reported to be better than the national average. ○ At a ward scale, the population does not have a particularly sensitive age profile, and there is no reported community in severe deprivation at the granularity available. However, it is noted that in some cases public data is disclosive and limited at a community level. ○ It should be noted that the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1-127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change.; • Assesses significance and provides a conclusion for overall health effects (by determinant) including: <ul style="list-style-type: none"> ○ A description of the likely significant effects on health, as determined by the scope for identifying those wider determinants of health relevant to the Proposed Development, drawing on reported impact assessment from the ES, including a review of the additional mitigation related to avoiding, reducing or managing health effects that may otherwise contribute to adverse impacts on mental health and wellbeing as a result of the Proposed Development; and ○ An assessment of the residual effects on health, by wider determinant of health, as a result of the Proposed Development. This takes into account the sensitivity of the receptors, embedded and additional mitigation and the magnitude of change as a result, applying health-specific 	<p>assessment logic that references determinants/pathways, sensitivity, magnitude and significance, and it cites the relevant IEMA/ISEP material and health-specific criteria (including thresholds/standards, baseline change, and policy/priority considerations) as part of that logic.</p> <p>The Applicant claims that Annex A identifies sub-populations more likely to experience differential effects and provides baseline context at ward level. The Council broadly agrees that the report identifies vulnerable groups and draws on ward-level and other public datasets for baseline context, while also acknowledging the stated limitations of disclosive or unavailable small-area data.</p> <p>The Council also notes that the Deadline 2 update [REP2-051] does offer improvement by incorporating additional contextual information from Claydons Solar Action Group and provides more explicit narrative discussion of sensitivity for certain sub-populations, particularly older people and those facing access/geographic constraints.</p> <p>Points of disagreement</p> <p>The Council does not fully agree with the Applicant's implied position that the ISEP methodology is explicitly applied in a way that is consistently transparent across all key judgement areas. In particular, the Council notes that parts of the assessment narrative would benefit from clearer signposting showing how the cited guidance is being applied where the report reaches evaluative conclusions (for example, around social cohesion and other less-regulated wellbeing pathways), rather than describing the methodology at a high level and then relying on topic chapter conclusions.</p> <p>The Council considers the Deadline 2 sensitivity additions [REP2-051], triggered by [REP1-127] remain largely descriptive and do not yet demonstrate, in a consistently applied way, how that sensitivity narrative is translated into discrete receptor definition and then carried through into determinant-specific significance judgements and targeted mitigation and monitoring for the most affected receptors and places.</p> <p>The report itself recognises that some residual effects are spatially specific and relate to landscape/visual change and PRoW experience, including cumulative dimensions. In that context, the Council's earlier concern ([REP2-090], Q1.13.1 and [REP 2-092],1.1.8 – 1.1.24 (LIR Addendum)) about the need for more explicit, place-based assessment and mitigation for higher-exposure receptors is not addressed by the Deadline 2 update [REP2-051]. By way of example, the Council considers further</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			criteria.	<p>receptor-led assessment and mitigation justification remains necessary in relation to the higher-exposure groups and locations previously identified by the Council, including Preston Farms and TCS Biosciences, specific high-exposure residential/farm receptors, and the nearest settlements and key PROW corridors, where wellbeing effects are most likely to be experienced and where targeted avoidance, enhancement and monitoring should be demonstrably set out.</p> <p>The Council also maintains its earlier points ([REP2-090], Q1.13.1 and [REP 2-092],1.1.8 – 1.1.24 (LIR Addendum)) that, although the report references embedded and additional mitigation and draws on management plans and certified documents, the report should provide clearer assurance that the mitigation outcomes relied upon are accurately cross-referenced and secured at the level of specificity described, as this traceability issue is not resolved by a sensitivity-focused narrative update.</p>
6.4	4.6.19	Comment requesting that the Applicant update the Environmental Statement to make it clear whether effects on human health are significant or not and identify the degree to which any proposed mitigation measures would reduce the significance of effects	<p>The Health Effects Report (Annex A to the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056]) submitted at Deadline 1 sets out a clear assessment of significance, applying significance criteria defined by ISEP guidance, of health effects by determinant of health relevant to the change caused by the Proposed Development, in the context of sensitivity of populations, sub-populations and receptors to change.</p> <p>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.</p> <p>The Health Effects Report (Annex A to the ES Volume, - Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]) concludes that the potential for health effects at the population scale are limited and that wider determinants of health considered are unlikely to result in significant adverse effects for the population. It is noted that in some instances, sub-populations and individual receptors may be more sensitive, and residual significant effects related to landscape and visual change may have the potential to lead to adverse health pathways with in some localised, temporary and spatially-limited effects – however these are not likely to result in significant health effects at the assessed scale.</p>	<p>Buckinghamshire Council notes the Applicant's statement that the Health Effects Report [REP2-051] now sets out a clear assessment of significance by determinant, including a description of effects prior to additional mitigation to inform review of additional mitigation measures, and that it then reports residual effects taking account of sensitivity, mitigation and magnitude. The Council agrees that the report is structured to present health effects by determinant/pathway and to distinguish between pre-mitigation and post-mitigation (residual) outcomes, with stated significance conclusions, which provides a clearer "significant/not significant" presentation than was previously available through dispersed topic chapters alone.</p> <p>Buckinghamshire Council also acknowledges that the Applicant has, through the Deadline 2 update [REP2-051], strengthened the consideration of sensitivity and potential differential effects by incorporating additional contextual baseline information from Claydons Solar Action Group and drawing this through into more explicit sensitivity narrative for certain sub-populations (in particular older people and those facing access/geographic constraints), including GP-registered population context that the Applicant describes as anecdotal. The Council considers that this additional context is relevant in principle to understanding how effects may be experienced differently by some groups, and that it helps to improve the transparency of sensitivity considerations within the health narrative.</p> <p>However, the Council does not fully agree with the Applicant's further conclusion that, because population-scale effects are described as limited, residual significant effects associated with landscape and visual change and more sensitive sub-populations</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
				<p>are unlikely to result in significant health effects "at the assessed scale". The report itself recognises that some residual effects remain significant in experiential terms (notably those associated with landscape/visual change and PROW experience, including cumulative dimensions), and it acknowledges that some sub-populations and receptors may be more sensitive; in the Council's view, this is where the assessment still needs to more clearly demonstrate the degree to which mitigation reduces significance for the most affected receptors and users, and to explain, in a receptor-led way, why those residual significant experiential effects do not translate into significant health and wellbeing effects for higher-exposure groups and locations.</p>

Table 3.7: Land and Groundwater

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Adequacy of Assessments				
7.1	4.10.1	<p>Comment that the Proposed Development may give rise to disturbance of existing contamination, potential introduction of new contaminant sources during construction, operation and decommissioning, and limited physical effects on underlying geology. Further comment that only limited groundwater investigation has been undertaken, so further investigation required, particularly on groundwater depth, flow regime, and geotechnical characteristics.</p>	<p>The Applicant has assessed the potential for the Proposed Development to give rise to disturbance of existing contamination, the potential for introduction of new contaminant sources and the potential for physical effects on underlying geology, and concluded that any residual effects after mitigation will not be significant (ES Volume 2, Chapter 11: Land and Groundwater ([EN010158/APP/6.2.2] [REP1-038]).</p> <p>No direct infiltration into the ground is proposed as part of the drainage proposals, and where partial infiltration is allowed within road swales, pre-treatment of flows is expected to be achieved. Adequate pollution control is proposed within drainage networks across the Proposed Development to mitigate potential introduction of new contaminant sources.</p> <p>It is noted that ground investigation work completed to date was preliminary, and the Applicant has committed to further detailed ground investigation work (Outline CEMP [EN010158/APP/7.2.3]), which will specifically investigate the potential presence of existing contamination, the existing groundwater regime and the shallow geological conditions. This will ensure that the initial conceptual site model derived for the site based on desk-based information can be refined based on the site-specific ground investigation results.</p> <p>The proposed ground investigation will be undertaken to collect data relating to geotechnical issues, as well as investigating any potential contamination issues.</p> <p>For more detailed information relating to this item, the Applicant refers the reader to the following responses:</p> <ul style="list-style-type: none"> • With respect to the potential for the Proposed Development to give rise to disturbance of existing contamination, see the response to RR-26 (Effects on Groundwater), starting on page 93, and the response to RR-26 (Monitoring) on page 96 (both in Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]). This issue is also assessed within ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123], and ES Volume 2, Chapter 11: 	<p>Noted regarding the various documents providing information on disturbance of existing contamination, introduction of new contamination and physical effects. This information has been reviewed and relevant comments provided previously.</p> <p>The overarching comment on the limited investigation completed to date still stands and is acknowledge by the Applicant. However, BC notes that the Applicant has committed to further detailed ground investigation works to consider potential ground contamination, the groundwater regime and the shallow geological conditions, with the proposed refinement of the CSM. The ground investigation should be completed in adequate time to allow an interpretative report to be developed, to consider relevant mitigation measures including any required remediation prior to construction works commencing.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Land and Groundwater [EN010158/APP/6.2.2] [REP1-038].</p> <ul style="list-style-type: none"> With respect to the potential for introduction of new contaminant sources, this is assessed within ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]. Mitigation measures are provided in the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline DEMP [EN010158/APP/7.4.3], Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.3] and Outline Drainage Strategy [EN010158/APP/7.11.3]. With respect to the potential for physical effects to occur on underlying geology, further details are provided on page 89 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]. An assessment of likely effects acting on the physical characteristics of the geological units is presented in Section 11.8.1 of ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038] for the construction phase, Section 11.8.4 for the operation (including maintenance) phase and Section 11.8.7 for the decommissioning phase. 	
7.2	4.10.2	<p>Comment that there is uncertainty related to the siting of BESS in locations where shallow groundwater may be present, therefore additional information is required to confirm suitability of locations.</p>	<p>An intrusive site investigation is proposed, as secured in the Outline CEMP [EN010158/APP/7.2.3]. The scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, where appropriate) prior to any works commencing. This will provide site-specific information on the existing groundwater regime, so that groundwater levels in BESS siting locations can be measured, and this information can be taken into account when finalising the design of below-ground structures and features.</p> <p>Specific mention of mitigation measures to address any potential impacts on shallow groundwater in the BESS location are made in the Outline CEMP [EN010158/APP/7.2.3], to ensure that necessary mitigation measures relating to this issue are secured.</p> <p>Further details are provided in the response to RR-26 (Approach to Assessment), starting on page 90 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and in the Outline Drainage Strategy [EN010158/APP/7.11.3].</p> <p>The Outline BSMP [EN010158/APP/7.9.3] also outlines clear mitigation measures in the event of BESS thermal runaway event. This document ensures environmental protection is</p>	<p>Noted, BC acknowledges that this further ground investigation is still to be completed which will inform the siting and detailed design of the BESS.</p> <p>BC welcomes the additional information provided in the Outline CEMP and Outline BSMP and all future iterations.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>maintained in the event of a BESS fire, including measures such as firewater containment; isolation and segregation through automatic and manual isolation valves; separate containment around BESS infrastructure to ensure segregation of potentially contaminated fire water through spill pathways; providing details of on-site testing and disposal procedures for both firewater and aggregate subbase which may be contaminated following a BESS fire. The additional detail of maintenance and specific mitigation will be included in the detailed Battery Safety Management Plan once the battery system to be used on site is known.</p>	
7.4	4.10.19	<p>Comment that the land and groundwater assessment relies on assumption of low contamination potential without presenting sufficient evidence to substantiate this. Further comment that there remains uncertainty around baseline land quality and contamination pathways due to limited scope of investigation data.</p>	<p>The assessment conclusions rely on the fact that mitigation in relation to contamination (if present) will be completed prior to construction works commencing (and that any such required actions are secured by the Outline CEMP [EN010158/APP/7.2.3]). Therefore if land or groundwater is contaminated, any risks from this will be resolved prior to construction work commencing, meaning that there will be a low contamination potential after secured ground investigation and associated remediation (if required) have been completed.</p> <p>An intrusive site investigation is secured by the Outline CEMP [EN010158/APP/7.2.3] and the scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, as appropriate). If this identifies any contamination that needs to be addressed, and any subsequent monitoring and remediation will also be agreed with Buckinghamshire Council and the Environment Agency (as appropriate).</p> <p>Further details explaining the approach are provided in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2].</p>	<p>BC accepts the assessment approach whereby in situations where contamination is found present, mitigation will be completed prior to construction works and risks will be resolved.</p> <p>BC acknowledges that the Applicant has committed to further detailed ground investigation works, including appropriate groundwater monitoring, and that this ground investigation, monitoring and any remediation required will be secured through the outline and future iterations of the CEMP.</p>
7.5	4.10.22	<p>Comment that the assessment of geological impacts is limited, with Buckinghamshire Council requiring a more detailed characterisation of geological units, their sensitivity to earthworks, and their relationship to groundwater behaviour which would strengthen the assessment and is expected to be addressed through the forthcoming ground investigation</p>	<p>An assessment of geological units was scoped into the environmental impact assessment, and this element of the assessment was updated for Deadline 1 to provide more details on potential physical effects on geological units (and potential related effects on groundwater receptors), as reported in ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]. The assessment concluded that by adhering to all required mitigation measures, changes to the physical characteristics of the geological units would not cause resultant significant changes to the groundwater quality or quantity.</p> <p>Further ground investigations, which will obtain information on the underlying ground conditions and will include ground gas and groundwater monitoring, will be completed prior to</p>	<p>Noted regarding further information provided in the updated ES chapter and responses to the RRs.</p> <p>BC acknowledges that the Applicant has committed to further detailed ground investigation works which is to be secured through the Outline CEMP and that the Mineral Safeguarding Assessment will be updated accordingly.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>construction works commencing, as set out in the Outline CEMP [EN010158/APP/7.2.3] and the report will be issued to the Local Planning Authority. This will provide further information relating to potential pollutant linkages that were identified by ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123]. Following the completion of the ground investigation works, the Mineral Safeguarding Assessment will be updated and issued to the Local Planning Authority. The ground investigation works will provide more detailed characterisation of geological units, their sensitivity to earthworks and their relationship to groundwater behaviour.</p> <p>Further information relating to the potential effects on geological units from the construction, operational and decommissioning phases of the Proposed Development was provided in the response to RR- 26 (Effects on Groundwater, starting on page 93) within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006].</p>	
7.6	4.10.23	<p>Comment that additional hydrogeological assessment will be essential to confirm that the proposed BESS locations do not pose an unacceptable risk to groundwater and are resilient to shallow groundwater conditions.</p>	<p>An intrusive site investigation is proposed, as secured in the Outline CEMP [EN010158/APP/7.2.3]. The scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, where appropriate) prior to any works commencing. This will provide site-specific information on the existing groundwater regime, so that groundwater levels in BESS siting locations can be measured, and this information can be taken into account when considering potential risks to groundwater associated with the BESS location, when finalising the design of below-ground structures and features, and with determining what mitigation measures would be necessary to protect the groundwater receptors.</p> <p>Specific mention of mitigation measures to address any potential impacts on shallow groundwater in the BESS location are made in the Outline CEMP [EN010158/APP/7.2.3], to ensure that necessary mitigation measures relating to this issue are secured.</p> <p>Further details are provided in the response to RR-26 (Approach to Assessment), starting on page 90 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and in Outline Drainage Strategy [EN010158/APP/7.11.3].</p>	<p>BC notes that the Applicant has committed to further detailed ground investigation works to consider the groundwater regime across the site and specifically around the BESS.</p> <p>The ground investigation should be completed in adequate time to allow an interpretative report to be developed and any hydrogeological modelling completed for the site and specifically around the BESS to inform the detailed design.</p> <p>It is also noted that any remediation / mitigation required will be secured through the Outline and future iterations of the CEMP.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
7.7	4.10.24	Comment that no significant sterilisation effects have been identified regarding mineral resources, and confirmation of this conclusion's suitability will depend on the results of the pre-construction ground investigation which must be incorporated into the final Mineral Safeguarding Assessment	The Applicant has noted the requirement by Buckinghamshire Council that the findings of the intrusive ground investigation will be used to review the contents of the Mineral Safeguarding Assessment, which forms Appendix 2 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016], and if necessary, the Mineral Safeguarding Assessment will be updated to present as a revised document. This is secured in Table 3.6 of the Outline CEMP [EN010158/APP/7.2.3].	BC acknowledges that the Applicant has committed to further detailed ground investigation works which is to be secured through the Outline CEMP and that the Mineral Safeguarding Assessment will be updated accordingly.
7.8	4.10.25	Comment that additional information is required to support the land and groundwater assessment, the Minerals Safeguarding Assessment and proposed mitigation measures.	<p>The Applicant has discussed the approach to further ground investigations with Buckinghamshire Council and this has been agreed in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.2] submitted at Deadline 1.</p> <p>An intrusive ground investigation is secured within the Outline CEMP [EN010158/APP/7.2.3] and the scope of this will be agreed in advance with Buckinghamshire Council (and the Environment Agency, as appropriate). If this identifies any contamination that needs to be addressed, any subsequent monitoring and remediation will also be agreed with Buckinghamshire Council and the Environment Agency (as appropriate).</p> <p>This work will be completed prior to construction works commencing and the report will be issued to Buckinghamshire Council. This will provide further information relating to potential pollutant linkages that were identified by ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2] [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123]. Following the</p> <p>completion of the ground investigation works, the Mineral Safeguarding Assessment (which forms Appendix 2 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016]) would be updated, if required, and issued to Buckinghamshire Council.</p>	<p>BC acknowledges and agrees with the details and current position of the SoCG.</p> <p>BC acknowledges that the Applicant has committed to further detailed ground investigation works which is to be secured through the Outline CEMP and that the Mineral Safeguarding Assessment will be updated accordingly.</p> <p>The ground investigation should be completed in adequate time to allow an interpretative report to be developed to consider relevant mitigation measures including any required remediation prior to construction works commencing.</p>
Adequacy of the Proposed Mitigation Measures and How They Would Be Secured				
7.9	4.10.21	Comment that contamination risk as a result of the risk of a BESS fire and chemical release should be accounted for with clear mitigation measures in the OEMP. Further comment that this should include firewater containment, spill pathways, emergency response procedures, and management of hazardous substances.	<p>The Applicant updated the management plans for Deadline 1. These elements are incorporated into the appropriate documents, as detailed below, with the key document that covers these issues being the Outline BSMP [EN010158/APP/7.9.3]:</p> <ul style="list-style-type: none"> • Outline CEMP [EN010158/APP/7.2.3], as covered by a number of separate mitigations (see pages 	BC has reviewed the additional / amended information within the five documents listed in the previous column and is satisfied with the contents on this issue.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>53, 55, 59, 60, 61 and 69);</p> <ul style="list-style-type: none"> • Outline OEMP [EN010158/APP/7.3.3], as covered by a number of separate mitigations (see pages 26-31, 33-36 and 39-40); • Outline DEMP [EN010158/APP/7.4.3], as covered by a number of separate mitigations (see pages 29, 33, 36-42 and 45-46); • Outline BSMP [EN010158/APP/7.9.3], as covered by a number of separate mitigations (see Section 6, specifically parts 6.6.7 and 6.6.8 on pages 28); • Outline Drainage Strategy [EN010158/APP/7.11.3], see Sections 6.1.4 (page 11), 6.5.2 (page 12) and 6.7 (page 13). <p>For specific information relating to the mitigation measures, please refer to the responses to [RR-026] (Impacts from BESS, see page 88) and RR-081 (BESS drainage design, see page 137) from Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006].</p> <p>The Outline BSMP [EN010158/APP/7.9.3] includes the following sections:</p> <ul style="list-style-type: none"> • Clear mitigation measures in the event of BESS thermal runaway event. • Environmental protection measures to be maintained in the event of a BESS fire (including measures such as firewater containment and isolation through automatic and manual valves). • Separate containment around BESS infrastructure to ensure segregation of any contaminated fire water through to potential spill pathways • Providing details of on-site testing and disposal procedures for both firewater and the aggregate subbase which may be contaminated following a BESS fire. • The additional detail of maintenance and specific mitigation will be included in the detailed Battery Safety Management Plan once the battery system to be used on site is known. <p>In addition, the Applicant has amended ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038] to ensure that there is specific mention of this issue in respect of the operational phase of the development (with</p>	

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			the topic already being sufficiently covered within the decommissioning section).	

Table 3-8 Landscape and Visual (including Design)

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

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>project. Again, the Applicant considers the assessment to be robust, legible and consistent and therefore compliant with implementation of best practice methodology as described above with no requirement for reassessment.</p>	
8.3	4.4.62	<p>Comment noting that Buckinghamshire Council believes that given the high/medium sensitivity of the landscape receptor, the introduction of the Proposed Development would not result in a moderate beneficial residual effect at year 10 of operation.</p>	<p>The Applicant respectfully disagrees that effects on landscape fabric would not result in moderate beneficial effects at year 10. As set out in paragraphs 10.10.285-10.10.291 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] the proposed new vegetation, which would include approximately 4.3km of hedgerow and 8.78ha of woodland, would result in significant planting gains and would make a positive contribution to the landscape fabric of the Site following 10 years of establishment.</p>	<p>Buckinghamshire Council welcome the provision of proposed mitigation set out by the Applicant and acknowledge that measures have been put forward to attempt to reduce proposed impacts on the landscape character. However, it is the position of Buckinghamshire Council that even with the provision of proposed mitigation planting the scale and nature of the proposed scheme would still be at odds with the existing landscape character and wouldn't result in moderate beneficial effects following 10 years of establishment.</p>
8.4	4.4.68	<p>Comment noting that relocating the BESS to other areas within the Proposed Development is recommended. Fields D18 and D19 situated to the south, present a viable alternative as this positioning would increase the distance from the setting of Botolph Claydon and reduce visual impacts on nearby PRowS. Another option is fields E10 and E11 to the north, which are closer to the existing substation. This location would allow the BESS to be grouped with an established infrastructure feature (and at least one further consented BESS).</p>	<p>The Applicant does not consider that this comment ought to carry weight in the overall planning balance. This is because, as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are <i>"vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision"</i>. Paragraph 4.3.28 of NPS EN-1 (2023) goes on to state that such alternatives should, wherever possible, be identified <i>"before an application is made to the Secretary of State"</i>.</p> <p>The location of the BESS in Fields D8 and D9 has followed a robust site selection process as set out in Section 5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. Paragraph 5.4.16 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] sets out that Fields D18 and D19 were removed from consideration for the BESS as part of the Stage 2 design process as a result of likely additional noise and landscape and visual effects based on further modelling and survey work. Whilst moving the BESS to Fields D18 and D19 would increase the separation distance to Botolph Claydon, it is noted that no likely significant effects have been reported in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] for visual receptors in the village. Furthermore, the relocation to Fields D18 and D19 would bring the BESS into greater proximity to the Quanton-Wing Hills Area of Attractive Landscape and the Hogshaw Farm and Wildlife Park visitor attraction which would have further adverse effects.</p> <p>Consideration of Fields E10 and E11 as a potential location for the BESS is provided in response to paragraphs 4.2.26 and 4.2.27 of the LIR in Table 4-2: Need, Site Selection and Alternatives of this response to the Council's LIR.</p>	<p>Buckinghamshire Council's position is still that there are perceived benefits to the following alternative fields: D18 and D19 or E10 and E11 therefore the summary position is still the current position of Buckingham Council.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
8.5	4.4.69	<p>Comment notes that the scale and nature of the landscape change introduced by the Proposed Development would be unprecedented as there are no other developments of this nature within the immediate study area and it is therefore regarded as out of character in this rural landscape. Whilst mitigation measures have been incorporated there will still be significant adverse effects on landscape character and visual receptors.</p>	<p>ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] presents an assessment of effects on landscape character. The assessment acknowledges that some significant effects on landscape character would be experienced during the duration of the operation phase of the Proposed Development. However, the significant landscape effects of the Proposed Development would be largely reversible following decommissioning. While changes cannot be fully mitigated, the design includes embedded planting to reduce visibility where possible.</p> <p>Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes with a consideration of the Planning Balance and justifies how the urgent need for an unprecedented capacity of new solar generation, as demonstrated in the Statement of Need [EN010158/APP/5.6] [APP-036] outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited. Moreover, these limited impacts are to be considered against the backdrop of national policy. Paragraph 5.10.5 of NPS EN-1 (2023) is clear in recognising that virtually all NSIPs will give rise to adverse effects on the landscape and this point is further contextualised to energy infrastructure through Paragraph 5.10.13 of NPS EN-1 (2023) which notes that all proposed “energy infrastructure is likely to have visual effects for many receptors around proposed sites”. It is therefore the role of the Secretary of State to judge, under Paragraph 5.10.14 of NPS EN-1 (2023), whether the visual effects on sensitive receptors (e.g., local residents) and other receptors (e.g., visitors to the local area) outweigh the benefits of the Proposed Development. The Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes that the visual effects, together with those other effects identified through the Environmental Statement, do not outweigh the clear benefits of the Proposed Development and the planning balance is firmly in favour of approval.</p>	<p>Buckinghamshire Council accept that the response to the comment acknowledges that significant effects on the landscape character would be experienced. The life span of the proposed scheme would be of a sufficiently long time period that adverse changes to the landscape character would become embedded with the landscape.</p>
Effects on Visual Amenity				
8.6	4.4.2	<p>Comment noting concerns with the predicted impacts that would be experienced both on the landscape character and on visual receptors. Comment noting concern with the industrialising effect of the Proposed Development and the particular sensitivity upon a number of raised villages within the local landscapes undulating landform.</p> <p>Further comment noting that the BESS is located too close to landscape designations, including the Aylesbury Vale Area of Attractive Landscape, and is likely to be visible from nearby</p>	<p>The Applicant recognises the concerns regarding landscape change but does not consider the terms ‘industrialisation’ and ‘industrialised’ applicable to the Proposed Development. An assessment to determine the likely significant effects on landscape and visual amenity is presented in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] and reports that likely significant effects on landscape character would occur at Year 1 and would remain for the duration of operation within defined parts of Landscape Character Area 5.7 (LCA 5.7): Hogshaw Claylands; Landscape Character Area 7.3 (LCA 7.3): Claydon Bowl; and Landscape Character Area 9.1 (LCA 9.1): Finemere Hill. The assessment concludes that significant adverse visual effects are likely to occur at Year 1 and would remain for the duration of operation for users of PROWs between Botolph Claydon and Runts Wood (including Splash</p>	<p>Buckinghamshire Council acknowledge the response and the concern with regards to term ‘industrialisation’ but it cannot be argued that the proposed scheme will not be introducing elements that are out of character to the landscape and will be of a scale that is industrial in nature.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		viewpoints.	<p>Lane and Bernwood Jubilee Way); PRoW between Calvert Road and HS2; PRoW to Finemere Hill (including the permissive route to Runt's Wood); PRoW between East Claydon/East Claydon Road within Parcel 3; and Swan's Way/Outer Aylesbury Ring; for residents of Bernwood Farm and Sion Hill Farm; and for visitors to Claydon House and Hogshaw Farm and Wildlife Park; and at Year 1 of operation for users of the North Buckinghamshire Way/Midshires Way and residents of 4-7 Catherine Cottages.</p> <p>As set out within Section 5.3-5.5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], local landform has influenced the design of the Proposed Development from the outset. Within Parcel 1, proposed Solar PV was removed from land on top of Knowl Hill, to ensure Solar PV development would not be located on the highest and most visible area within Parcel 1 (Paragraph 5.3.7). Within Parcel 2, fields in the north (Fields D1 and D3 (North)) were removed from consideration for Solar PV development due to the topography and visual considerations, which included reducing visibility from Botolph Claydon (Paragraph 5.4.18). In addition, elements of the Proposed Development such as the Rosefield Substation, BESS and the Main and Satellite Collector Compounds have been located to minimise their visual impacts. As summarised in Table 10.14 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2], none of the raised villages would experience significant visual effects as a result of the Proposed Development.</p> <p>The Applicant respectfully disagrees that the BESS is located too close to the wider Quainton-Wing Hills Area of Attractive Landscape. As set out on page 49 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] it is acknowledged that there would be some indirect effects on Quainton-Wing Hills Area of Attractive Landscape as a result of the BESS in Fields D8 and D9. However, due to their siting on lower lying fields of the Site at a distance of some 800m at their closest point to the Area of Attractive Landscape, such effects would be indirect and not significant. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] and the accompanying ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] identifies viewpoints 15, 16, 29-31, 33 and 41 from within the Area of Attractive Landscape and demonstrates that visibility of the BESS would generally be from more elevated and distant locations.</p>	
8.7	4.4.3	Comment noting that the area is recognised and protected for its rural character, and the introduction of large-scale infrastructure would create a significant industrialising effect. Buckinghamshire Council deems the use of Fields B28 and B29 for solar PV as unsuitable. In addition, the BESS should be relocated to a more appropriate site.	This is understood to be a request for the removal of Solar PV modules from Fields D28 and D29 due to the potential impacts on the Area of Attractive Landscape. The Applicant respectfully disagrees that Solar PV modules should be removed from Fields D28 and D29 to protect the wider landscape designation of the Quainton-Wing Hills Area of Attractive Landscape. Fields D28 and D29 are considered appropriate for solar PV development due to the visual enclosure created by their topography and surrounding mature woodland, which largely separate them from the wider and more visually open parts of the Area of Attractive Landscape within the Order Limits. As a result, whilst there would be likely significant effects on landscape character	<p>Buckinghamshire Council acknowledge the response in stating that significant effects would be experienced on landscape character as a result of the PV's being located in fields D28 and D29 and as the effects are therefore significant, it is Buckinghamshire Council's position that this location is still unsuitable for a combination of landscape and visual issues (along with other considerations relevant to these fields).</p> <p>It is Buckinghamshire Council's position that the siting of the BESS is still inappropriate and that we are not satisfied that all measures have been taken to either relocate it to reduce or avoid adverse</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>to Fields D28 and D29, this would be a localised effect and would not extend to the wider Quainton-Wing Hills Area of Attractive Landscape. As noted in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] and the accompanying ES Volume 4, Appendix 10.4: Rosefield Viewpoint Analysis [EN010158/APP/6.4] [APP-113] viewpoints 15, 16, 29-31, 33 and 41 demonstrate the localised nature of views of the Proposed Development within Fields D28 and D29.</p> <p>As set out in the response to paragraph 4.4.2 of the LIR above, the Applicant respectfully disagrees that unacceptable impacts would be experienced as a result of the proximity of the BESS to the Quainton-Wing Hills Area of Attractive Landscape. As set out in the response to paragraph 4.4.68 of the LIR above, the Applicant respectfully disagrees that relocating the BESS would result in overall reduced impacts.</p>	<p>impacts and created a design and layout that responds to the local character and visual receptors so that it is less incongruous to its position in the landscape.</p>
8.8	4.4.7	<p>Comment noting that the proposed location of BESS in Fields D8 and D9 places it in close proximity to several PROWs including the Bernwood Jubilee Way which is a designated Long-Distance Path as well as the village of Botolph Claydon. The proposed mitigation whilst trying to reduce the perceived visual impacts would introduce elements that would be out of character. The Bernwood Jubilee Way (ECL/8/1) although being further away from the BESS location runs in part at a higher elevation and would therefore have views into the BESS Compound. The proposed mitigation measures would have a reduced effect from this elevated vantage point.</p>	<p>As set out in the response to paragraph 4.4.61 of the LIR above, the Applicant respectfully disagrees that relocating the BESS would result in overall reduced impacts. Whilst the Applicant acknowledges in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] that significant adverse visual effects are likely to occur for the duration of operation for users of PROWs between Botolph Claydon and Runts Wood, including Bernwood Jubilee Way, the Applicant respectfully disagrees that mitigation measures would be uncharacteristic.</p> <p>The taller elements of the Proposed Development, which include the noise barrier and BESS, are located in low lying areas of the Order Limits with proposed mitigation hedgerow planting to minimise and soften views. The solar PV development and BESS have been set back from the Bernwood Jubilee Way, given its elevated position, to allow views to continue over the top of the built elements of the Proposed Development, as described in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018].</p>	<p>The Applicant has acknowledged that significant adverse effects will be experienced, Buckinghamshire Council acknowledge that measures have been taken to reduce adverse effects, but these will still be present during operation. Fundamentally the nature of the BESS, its location, the landform and the sensitive nature of the receptors has resulted in these impacts. Without further changes to the location and/or design of the BESS these will remain.</p>
8.9	4.4.63	<p>Comment noting that the LVIA has assessed the cumulative impacts on landscape character as not being significant as a consequence of: Landscape containment, Local topography and Woodland blocks. It is the opinion of Buckinghamshire Council that the introduction of the Proposed Development would result in significant adverse impacts on the landscape character as it would introduce large built elements that are out of character within the rural landscape and that the local landform, woodland blocks and topography does not offer substantial features to mitigate the predicted adverse effects even when additional mitigation has been incorporated.</p>	<p>As the Applicant set out in Table 2 of ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3], the LVIA has concluded that there is potential for an increase in significant landscape effects as a result of combined effects on Landscape Character Area 9.2: Quainton Hill for the duration of operation. There would also be increased combined effects on landscape character, albeit with no change to overall significance, as follows:</p> <ul style="list-style-type: none"> • Landscape Character Area 5.6: Claydon Valley – minor adverse (not significant) <i>solus</i> effects, increased to moderate adverse (not significant) for combined effects; • Landscape Character Area 5.7: Hogshaw Claylands – moderate adverse (significant) <i>solus</i> effects, increased to major/moderate adverse (significant) for combined effects; and 	<p>The summary position is still the current position of Buckingham Council, it would therefore be potentially beneficial to have a discussion directly between Buckinghamshire Council and the Applicant to allow opposing views to be discussed.</p>

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			<ul style="list-style-type: none"> Quainton-Wing Hills Area of Attractive Landscape – moderate/minor adverse (not significant) <i>solus</i> effects, increased to moderate adverse (not significant) for combined effects. <p>As set out in para. 4.1.154 in ES Volume 4, Appendix 17.2: Landscape and Visual Inter-</p> <p>project Cumulative Effect Assessment [EN010158/APP/6.4.3] these effects would extend no more than 2km beyond the Order Limits which would not be atypical considering the scale of the Proposed Development.</p>	
The Adequacy of Landscape and Visual Mitigation				
8.10	4.4.4	<p>Comment noting that Buckinghamshire Council is concerned with the interaction between the PRoWs and the Proposed Development. Further comment that Buckinghamshire Council is not satisfied that these potential impacts, such as noise etc., have been fully or accurately assessed and ultimately fails to protect and enhance the PRoWs as required by NPPF paragraph 105.</p>	<p>The Applicant respectfully disagrees that wider sensory effects, such as noise, have not been considered in the assessment of effects on users of PRoW. 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 effects afforded to users of PRoW. The Applicant therefore maintains that such 'sensory impacts' have been considered in the assessment of effects on PRoW users. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time.</p> <p>As a result, the change in noise due to the operation of the Proposed Development, relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse noise effects would not be expected. With regard for Paragraph 105 of the NPPF, the Applicant confirms, through Appendix 4 (Policy Compliance Assessment Tables) to the Planning Statement [EN010158/APP/5.7.3] [REP1-016] that the Proposed Development is compliant with this policy.</p>	<p>Buckinghamshire Council acknowledge the response but are not satisfied that full appreciation of the wider sensory impacts likely to be encountered by the PROW users. Adverse noise impacts will be factor for these users. It is accepted that a noise assessment has been undertaken, but that fails properly to reflect the magnitude and effect on PRoW users.</p>
8.11	4.4.5	<p>Comment noting that the proposed mitigation measures are too generic and too limited in scale to meaningfully reduce the identified harms.</p>	<p>The Applicant respectfully disagrees that mitigation measures are generic and limited in scale. As set out in response to paragraph 4.4.2 of the LIR above the Design Approach Document [EN010158/APP/5.8.2] [REP1- 018], provides evidence that high quality design has been used to avoid and prevent adverse environmental effects on landscape and visual receptors throughout the process of design development. The proposed design response includes discounting Solar PV development from specific fields within the Order Limits as set out within Section 5.3-5.5 of the Design Approach Document [EN010158/APP/5.8.2] [REP1-018]. As well as the standard offsets described at paragraph 5.4.4, bespoke offsets, as secured by the Design Commitments [EN010158/APP/5.9.4] are described as:</p> <ul style="list-style-type: none"> Bernwood Jubilee Way would have a 55m offset from the proposed Solar PV development to allow continued views over the Solar PV panels towards Quainton Hill and its landscape context. 	<p>Whilst Buckinghamshire Council acknowledge that a mitigation scheme has been provided, it the Council's position that certain areas would benefit from additional mitigation as demonstrated above with the siting and design of the BESS. The current position of Buckinghamshire Council is that we are still not satisfied that that all steps have been taken to fully mitigate the predicted impacts.</p>

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			<ul style="list-style-type: none"> The Midshires Way and North Bucks Way in Field E23 and permissive route in Field D28 would have a larger offset of 30m from the proposed Solar PV development to allow greater separation from the Proposed Development. The diversion of PRoW ECL/4/2 to align the PRoW with the field boundaries of Fields E10 and E11 provides greater separation from Rosefield Substation. The BESS and acoustic screen are offset at least 50m from the PRoW in Field D9. Woodland planting within Parcel 1 will respect the 'designed' character of the woodland blocks to the wider historic landscape of Claydon House. <p>In addition, bespoke offsets have been provided for each individual property reviewed as shown in ES Volume 3, Figure 10.13: Residential Property Location Plan [EN010158/APP/6.3.2] [AS-031].</p> <p>The assessment in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] acknowledges that not all such effects can be fully mitigated and a number of significant adverse landscape and visual effects would remain, as is typical of the scale of development that is proposed; such effects will be weighed in the planning balance.</p> <p>Requirements 4 and 7 of the Draft DCO [EN010158/APP/3.1.4] require the detailed design of the mitigation measures and the detailed Landscape and Ecological Management Plan to be submitted to Buckinghamshire Council for approval. This ensures that Buckinghamshire Council are able to input to the final design of mitigation measures as the design is finalised.</p>	
8.12	4.4.5	Comment noting that there is clear potential to soften the visual and landscape effects of the Proposed Development through more substantial interventions, such as additional hedgerow planting and the use of strategically positioned tree belts that take advantage of the site's natural undulating topography.	As set out in the Outline LEMP [EN010158/APP/7.6.3] the Applicant has provided for extensive new hedgerow and structural woodland planting within the Order Limits to provide appropriate mitigation for the Proposed Development, in direct response to specific guidelines in the Aylesbury Vale Landscape Character Assessment and based on robust baseline surveys and consultations with relevant consultation bodies.	Following the Applicant's response Buckinghamshire Council's position remains as previously stated.
8.13	4.4.6	Comment noting that some of the proposed mitigation elements, such as installation of a 3.5-5m high timber noise attenuation fence, would worsen the landscape and visual impacts with it appearing incongruous within a rural setting and forming a visually prominent feature.	The design of the acoustic barriers, which may not be close-boarded acoustic fencing, will be finalised during the detailed design stage once the noise levels of the final equipment choices are known. As set out in [RR-026] Noise and vibration impacts of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], there are various material options that can be adopted for the acoustic barriers. The specification of any acoustic mitigation scheme would be provided prior to operation and is secured by a requirement of the Outline OEMP [EN010158/APP/7.3.3], (Section 2.8).	Following the Applicant's response Buckinghamshire Council's position remains as previously stated.

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			<p>As set out on page 54 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA- 006], the impact of the proposed noise barriers has been considered in its location in a low lying area of the Order Limits together with proposed mitigation hedgerow planting. The assessment of landscape and visual effects presented in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] takes into account the location of noise barriers and reports the likely significant effects.</p>	
8.14	4.4.8	<p>Comment noting that the BESS should be relocated to other fields within the Proposed Development, such as Fields D18 and D19 which are located in close proximity to the south. This would have the benefit of positioning the BESS further away from the setting of Botolph Claydon; visual impacts on the associated PRowWs would still be present albeit at a reduced level as a consequence of the undulating landform.</p>	<p>As set out in the response to paragraph 4.4.68 of the LIR above, ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] explain the reasons why the proposed BESS has been located in Fields D8 and D9.</p>	<p>See previous response to the relocation of the BESS.</p>
8.15	4.4.8	<p>Comment noting that another alternative location for the BESS would be Fields E10 and E11; these are situated further to the north and would place BESS in closer proximity to the existing substation. Further comment that this would have the benefit of grouping a proposed major infrastructure element together with an established feature (and at least one further consented BESS). This would have the benefit of positioning the BESS further away from the setting of Botolph Claydon; visual impacts on the associated PRowWs would still be present albeit at a reduced level as a consequence of the undulating landform.</p>	<p>The Applicant does not consider that this comment ought to carry weight in the overall planning balance. This is because, as per NPS EN-1 (2023) paragraphs 4.3.28 and 4.3.29, alternative proposals, such as the one made, that are <i>"vague or immature can be excluded on the ground that they are not important and relevant to the Secretary of State's decision"</i>. Paragraph 4.3.28 of NPS EN-1 (2023) goes on to state that such alternatives should, wherever possible, be identified <i>"before an application is made to the Secretary of State"</i>.</p> <p>Detailed consideration of Fields E10 and E11 as a potential location for the BESS is provided in response to paragraphs 4.2.26 and 4.2.27 of the LIR in Table 4-2: Need, Site Selection and Alternatives of this response to the Council's LIR.</p> <p>As confirmed in ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP- 047] and the Design Approach Document [EN010158/APP/5.8.2] [REP1-018], Fields E10 and E11 were discounted for BESS development due to the presence of higher flood risk and offsetting requirements from overhead lines and pylons which transect the Fields. For Field E11, the proximity of Sion Hill Farm and associated noise and visual impacts weighed on the design decision to remove BESS development from this field.</p> <p>Locating the BESS within Fields E10 and E11 has the potential to cause significant adverse noise effects at Sion Hill Farm during the operation (including maintenance) phase of the Proposed Development. This would be a function of the reduced separation distance to the farm, the increase in noise emitting infrastructure within Parcel 3 and the inter-project cumulative effects with other developments in the vicinity of Parcel 3.</p> <p>As is noted in National Grid Electricity Transmission (NGET) Limited's Written Representation [REP1-130] and response to Examining Authority's Requests for Information [AS-037], NGET requires an easement of 30m either side of a tower, its base and the overhead lines that run between them. This gives rise</p>	<p>See previous response to the relocation of the BESS.</p>

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

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>that the Proposed Development is considered to be compliant with the relevant landscape and visual planning policies. Section 10 of the Planning Statement [EN010158/APP/5.7.3] [REP1-016] concludes with a consideration of the planning balance and justifies how the urgent need for an unprecedented capacity of new solar generation, as demonstrated in the Statement of Need [EN010158/APP/5.6] [APP-036] outweighs any potential significant adverse impacts, inclusive of the landscape and visual impacts, which (as the Environmental Statement sets out) are limited.</p> <p>Such effects will be weighed in the planning balance.</p>	
8.17	4.4.64	<p>Comment noting that given the size and scale of the Proposed Development, Buckinghamshire Council do not agree with the degree of professional judgement that has been used in compiling the magnitude of the impacts and therefore the subsequent significance of effects that have been identified. Buckinghamshire Council does not agree with the conclusions set out in the LVIA that there would not be significant adverse visual impacts on visual receptors.</p> <p>It is therefore recommended that all receptors which have a moderate magnitude of effect would receive at least a moderate adverse and significant residual effect (with additional mitigation).</p>	<p>As set out in the response to paragraph 4.4.61 of the LIR above, the Applicant welcomes the acceptability of the LVIA methodology by Buckinghamshire Council which includes clear description of how the magnitude of effect is assessed as set out in ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]. The methodology has been developed in accordance with standard practice as set out in The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) and Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of GLVIA3, both produced by the Landscape Institute. The Applicant is confident that this methodology has been applied consistently and transparently in the judgement of magnitude of effect throughout the LVIA and therefore respectfully disagrees that the assessment should be revisited to 'rely more heavily on the methodology rather than professional judgement.'</p>	<p>Buckinghamshire Council accept the response with regards to setting out the structure of the methodology but would still expect that a receptor which receives either a moderate/minor or moderate magnitude of effect would still be assessed as at least moderate adverse and therefore significant residual effect (with additional mitigation). Therefore, this is resulting in a disconnect between the two positions.</p>
Cumulative Effects				
8.18	4.4.73	<p>Comment noting that cumulative landscape and visual impacts must be considered both kinetically and sequentially, recognising the scale of change occurring across the district. This requires an appreciation of how multiple projects collectively generate significant adverse effects.</p>	<p>As set out in Reference [RR-026] Cumulative effects of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant has assessed the inter-project cumulative effects, including sequential (kinetic) effects, with other relevant developments. As presented in ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] and ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3], cumulative effects have been considered in terms of the additional effects of the Proposed Development and also the combined effects of all cumulative schemes together. The Applicant therefore considers that a worst-case, maximum combined cumulative effect has been considered, which would extend significant effects to approximately 2km beyond the Order Limits southeast of Parcel 2 to within LCA 9.2: Quainton Hill. The Applicant therefore respectfully disagrees that unacceptable impacts would be experienced generally across the district and maintains that</p> <p>the potential cumulative impacts are not atypical considering the scale of the Proposed Development.</p>	<p>Buckinghamshire Council do not feel that the response to this comment truly reflects the impacts generated from the number and scale of cumulative scheme effects within the wider context.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
8.19	4.4.74	Comment notes that Buckinghamshire Council maintains that when viewed alongside neighbouring applications, the Proposed Development would create an unacceptable cumulative landscape character impacts across the district.	As set out in the response to paragraph 4.4.73 of the LIR above, the Applicant has assessed only one instance where residual significant cumulative effects would be extended across the wider district.	See response above.

Table 3-9 Noise and Vibration

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Effects on receptors during construction and operation				

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
9.2	4.8.29	Comment noting noise emitting equipment and the possibility for persistent noise with further comment stating the need for compliance with thresholds set out in BS 4142:2014+A1:2019 and Planning Practice Guidance during the operation (including maintenance) phase.	Please refer to the response to paragraph 4.8.30 of the LIR below, on the basis that these paragraphs are linked.	See response to 4.8.30
9.3	4.8.30	Comment recognising that background noise levels are low due to the rural locality which increases the likelihood of significant noise effects being identified.	The significance criteria adopted for the operation (including maintenance) phase assessment accounts for the low background sound levels within the Study Area. On the basis that the Proposed Development has the potential to operate on a 24-hour basis, an external rating level of 35 dB LAr,Tr, inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period, whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. There may be a slight effect to the acoustic character of the area but not such that there is a change in the quality of life.	Whilst it is accepted that the applicant has adopted an external rating level of 35 dB LAr,Tr given the low background, and that the noise assessment has established no expected exceedances of this, Buckinghamshire Council must still express concern that some domestic receptors are shown as potentially experiencing noise 8-11dB above background at night. Notwithstanding that these levels still meet the set 35 dB level, the element of context within BS 4142:2014+A1:2019 must be considered and given the very quiet rural location, paired with the characteristics of the noise (i.e. humming etc), this remains a concern. These concerns are somewhat eased by the fact that the applicant's assessment is based on worst-case scenario, i.e. all plant operating at maximum capacity simultaneously, with unfavourable wind direction, which in real world situations would be somewhat unlikely and if so, not for prolonged periods. However, we must still consider the worst-case scenario when considering potential impact. These issues remain concerns and reflect the overall departure for this very quiet rural location for many receptors. This was a matter addressed further at ISH1.
9.4	4.8.32	Comment recognising the compliance of the submitted noise assessments and their conclusions, in accordance with recognised standards (such as BS 5228 for construction noise and BS 4142 for operational impacts). Further comment noting concerns regarding impact of noise on livestock and other animals that have not been addressed. Buckinghamshire Council consider that this may need to be addressed if the ExA deems it an important matter.	<p>Agreement with the assessment presented in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040] is acknowledged.</p> <p>Regarding potential impacts for livestock, a range of mitigation measures have been introduced to reduce noise levels experienced by livestock in surrounding fields. Further commitments have been introduced within Section 2.9 of the Outline CEMP [EN010158/APP/7.2.3], as noted below:</p> <p><i>"Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. In addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable."</i></p> <p><i>In addition, the following statement is included with Section 2.10 of the Outline CEMP [EN010158/APP/7.2.3] to mitigate any impacts to livestock:</i></p> <p><i>"Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised,</i></p>	Buckinghamshire Council notes this response and welcomes the additions in respect of controls to prevent disturbance to livestock in general. However, the Council's concerns remain about particularly sensitive receptors (e.g. TCS Biosciences / Preston Farms) and the proper approach to assessment of these receptors.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p><i>temporary measures would be introduced to reduce the construction induced noise levels experienced by livestock, where appropriate."</i></p> <p><i>Livestock Noise and Vibration Technical Study [EN010158/APP/8.15] which provides further detail on the potential for noise impacts to livestock and associated mitigation measures has been submitted at Deadline 2.</i></p>	
9.7	4.8.34	Comment stating that the model for how noise impacts residential receptors underestimates real- world intrusiveness.	<p>The significance criteria adopted for the operation (including maintenance) phase assessment accounts for the low background sound levels.</p> <p>Taking into account the context in which sound occurs is an important part of a British Standard 4142:2014+A1:2019 assessment. One factor stated is that the absolute level of sound can be as, or more, important than relative outcomes where background and rating levels are low. This reflects the baseline environment at noise-sensitive receptors surrounding the Proposed Development.</p> <p>British Standard 4142:2014+A1:2019 does not define 'low' in the context of background sound levels nor rating levels. However, the Association of Noise Consultants suggest that background levels of less than about 30 dB LA90 and rating levels of less than about 35 dB LAr,Tr would be a reasonable indication. The background level stated reflects the conditions observed and measured in the baseline environment within the Study Area, particularly at night.</p> <p>On this basis, an external rating level of 35 dB LAr,Tr, inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period, whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. There may be a slight effect to the acoustic character of the area but not such that there is a change in the quality of life</p>	See comments to 4.8.30
9.8	4.8.35	Comment recognising the importance of Paragraph 4.8.34 of the LIR especially given the 6dB exceedance calculated at Bernwood Farm R2 and Hogshaw Farm R12. Further comment noting the impact/effect has not been explicitly acknowledged or addressed by the Applicant at this stage.	<p>The predicted rating noise levels at Bernwood Farm and Hogshaw Farm fall below the lowest observed adverse effect level threshold criteria, as defined within the assessment framework adopted in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]. As a result, there are no moderate adverse effects predicted, post mitigation.</p> <p>The magnitude criteria considers both the rating level relative to background sound level as well as the lowest observed adverse effect level, with the least onerous of the two being used to inform the significance outcome. The predicted rating noise levels associated with the operation (including maintenance) phase of the Proposed Development are not predicted to exceed 35 dB LAr,T at the two receptors.</p>	See comments to 4.8.30

Table 3-10 Population

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Effects on Businesses, Including Agricultural Businesses				
10.1	4.6.20 and 4.6.1	<p>Comment that Buckinghamshire Council is not yet able to confirm if the approach to assessment satisfies the expectations in the National Policy Statements NPS EN-1 (2023) and NPS EN-3 (2023), or other effects in line with ISEP guidance on scoping and assessing significance of health effects, since the Environmental Statement does not set out a clear or integrated assessment of likely significant effects on population and human health</p>	<p>The Applicant has considered feedback from Buckinghamshire Council and produced a Health Effects Report, as Annex A to the ES Volume 4 - Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.2] [REP1-056] submitted at Deadline 1, which aims to more clearly present the effects on health and wellbeing in accordance with NPS EN-1, NPS EN-3 and guidance produced by ISEP. A further iteration of the Health Effects Report has been updated and re-submitted at Deadline 2 to account for helpful information provided through Written Representations produced by Claydons Solar Action Group [REP1 127] and provide a more explicit conclusion in respect of the sensitivity of relevant sub-populations (older people, and people facing access or geographic factors) to change. The Applicant recognises that Buckinghamshire Council will wish to review this report and comment at subsequent deadlines, though will also be seeking to engage bilaterally on the matter.</p>	<p>Noted. Buckinghamshire Council has reviewed the latest iteration of the Health Effects Report [REP2-051]. Please refer to comments within Table 3-6 for the Council's position.</p>
10.3	4.13.2	<p>Comment raising concerns for the rural economy (including agriculture, tourism and established local businesses). Specific concern relates to:</p> <ul style="list-style-type: none"> a) The loss of associated employment, and questions around the adequacy and implications of land swaps; b) Concerns from three specific businesses about animal welfare, biosecurity, visual impact, and construction-related disruption; and c) That mitigation applied for landscape and visual effects on two tourist-sector businesses does not mitigate significant adverse effects or therefore sufficiently address visitor-access issues, business viability risks or wider visitor-economy impacts. <p>Further comment concluding that, in the context of the rural economy already being under pressure from declining agricultural employment and competing land-use demands, the Proposed Development is likely to exert material negative effects on nearby businesses, agricultural operations and tourism unless stronger mitigation</p>	<p>a) Employment and the Adequacy of Land Swaps</p> <p>The Applicant has undertaken an assessment of the scale of indicative land use and employment capacity change in the agricultural economy, effects on agricultural and non-agricultural businesses, and a review of effects on the tourist economy, as required by NPS EN-1, within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].</p> <p>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.</p> <p>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].</p> <p>b) Concerns from Three Specific Businesses (Prestons' Farms / TCS Biosciences Ltd, Hogshaw Farm and Wildlife Park and Claydon House)</p> <p>The Applicant has taken advice from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise, animal welfare and biosecurity and accessibility effects perceived by this business.</p> <p>During the pre-application phase, the Applicant took advice from concerned</p>	<p>This was one of a number of matters addressed in detail at ISH1 - in respect of TCS Biosciences and Preston Farms, alongside general comments made by the Claydon Solar Action Group in relation to other agricultural businesses affected by the Scheme. The Council notes that documents are due to be submitted at Deadline 3 and Deadline 4 relevant to this.</p> <p>The Council supports the request of the ExA (Q1.17.8) for further clarity to be provided by the Applicant in respect of the professional judgement that has been used to reach conclusions on the significance of effects, with reference to Table 14.23 [REP2-034]. This connects to a broader concern of the Council that the conclusions made by the Applicant regarding the assessment of effects of the Scheme on agricultural businesses and landholdings are not sufficiently transparent. The reporting groups multiple businesses into combined receptor groups for which a single set of assessment inputs is produced - i.e. one sensitivity, one impact magnitude and a generalised mitigation reference, then leading to a single residual effects assessment (in this case, for the agricultural businesses and landholdings, but also the case for other receptor types in the scope of the Population assessment). This grouping fails to reflect the circumstances referenced by the ExA, namely that replacement land is not agreed by tenants to be of the same level of provision and / or the grazing corridor is</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		and long-term support mechanisms are secured.	<p>non-agricultural businesses, and amended the Proposed Development's design to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. In order to limit disruption to land used by TCS Biosciences Ltd, based on this organisation's feedback the Applicant has made several changes including but not limited to:</p> <ul style="list-style-type: none"> Removed the option consulted on previously for Rosefield Substation and/or BESS to be included on Field 23 (which will now be a field of Solar PV modules), thereby reducing perceived operational noise effects; and Confirmed in the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] that at the detailed design stage, the Solar PV module arrangement for Field E23 will be designed to incorporate movement corridors for Preston Farm's and/or TCS Biosciences Ltd's sheep and/or horses to cross the field to access their other adjacent grazing fields. <p>Full details of such changes are set out in Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107] and the Consultation Report [EN010158/APP/5.1] [APP-020].</p> <p>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.</p> <p>The Applicant has taken into account considerations of animal welfare and biosecurity both in the iterative development and design of the Proposed Development, and in the approach to adaptive, flexible and best- practice mitigation, see Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm of the Applicant's Response to Written Representations [EN010158/APP/8.12] for more detail.</p> <p>The Applicant has detailed a range of measures to ensure animals are not adversely affected by the Proposed Development. At Deadline 1, the Applicant amended design commitment G2 of the Design Commitments [EN010158/APP/5.9.4] to specifically require the design of corridors through the Solar PV development in Field E23 to be undertaken in consultation with the tenants and the Applicant is engaged in ongoing discussion with Preston Farms, which includes reference to this point.</p> <p>As indicated in the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107], the Applicant has updated the Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd.</p> <p>A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd [REP1-133] has been submitted by the Applicant at</p>	<p>not effective.</p> <p>BC maintains its position that there is a need for further assessment of Population effects to be undertaken and reported in a way that allows the reader to understand all factors that have led to the conclusions for a combined receptor type.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Deadline 2 (Note in Response to Preston Farms Ltd and TCS Bioscience Ltd Written Representations) to provide a clear, single document setting out the detail of the Applicant's position regarding the effects on and mitigation for these commercial operations. This includes an appended technical note (Appendix 1 - Noise and Vibration Technical Note) has also been submitted at Deadline 2 to provide further information regarding the effects of noise and vibration on livestock (cattle and sheep) and horses, and set out how guidance (including from the British Horse Society) has been used to further develop the approach to monitoring, mitigation and engagement secured within construction and operational management plans.</p> <p>Further engagement with affected businesses is on-going, and the Applicant is working to address the proposed additional measures for management of environmental effects raised through Written Representations submitted by Preston Farms and TCS Biosciences Ltd [REP1-133].</p> <p>The Applicant recognises that there are residual significant adverse landscape and visual effects on two identified tourist-sector receptor businesses (Claydon House and Hogshaw Farm and Wildlife Park) – however it is noted that mitigation is in place to address these effects and reduce their significance as far as reasonably practicable. It is not considered that these residual effects would affect the viability of the businesses concerned given their diverse attraction and business models.</p> <p>In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting to the eastern edge of Parcel 2, in the form of new tree belts and hedgerows established to 3.5m, would provide some additional screening and filtering of views to the lower levels of the Proposed Development. Embedded mitigation also includes a 15m-width belt of structural native woodland (early) planting along southern boundary of Fields D8, D9, D19 and D26.</p> <p>ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] confirms that there are no significant residual effects anticipated on traffic and transport receptors which would have the potential to contribute towards 'visitor-access' issues raised by the Council – mitigation secured in the Outline CTMP [EN010158/APP/7.5.3] will ensure that any effects during construction are monitored and managed effectively and measures communicated to stakeholders and the community to avoid the likelihood of actual or perceived changes in accessibility to tourist facilities.</p> <p>For Claydon House, engagement has been undertaken with the National Trust, as set out in Table 10.1 within ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] with amendments to the approach to design and siting of infrastructure resulting, e.g.:</p> <ul style="list-style-type: none"> • A more designed approach has been applied to planting within Parcel 1 visible from Claydon House RPG. • The Satellite Collector Compound siting zone has been refined to 	

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>minimise visibility from Claydon House and its cladding will reference local vernacular.</p> <p>In response to stakeholder feedback from Phase Two Consultation, areas of proposed Solar PV modules have been removed from Fields B9 and B11, the siting zone for the Collector Compound in Field B23 has been reduced, and reinforcement of the existing tree belt and hedgerow along Three Points Lane has been included to reduce visibility of the Proposed Development from Claydon House.</p> <p>The creation of new permissive paths including a permissive path to Knowl Hill, with interpretation measures for Claydon House and Claydon Park and Garden, will mitigate effects (and potentially provide enhancement) relating to tourism and community access.</p>	
10.5	4.13.19	<p>Comment that Buckinghamshire Council consider the harms to local businesses and the economy as being a factor against the grant of the Proposed Development.</p> <p>They recognise steps are being taken in mitigation but state that further mitigation steps should be explored where possible, in line with policy (Paragraph 5.13.8 of NPS EN-1 (2023)).</p>	<p>Paragraph 5.13.8 of NPS EN-1 states that <i>"The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike."</i></p> <p>The Applicant has taken steps to transparently assess and consider the need for embedded, iteratively designed mitigation and additional mitigation that is adaptive and driven by engagement with particularly sensitive businesses.</p> <p>Where businesses are directly affected, the Claydon Estate is negotiating Heads of Terms for land swaps to provide for replacement land of at least the same quality and accessibility to support the viability of businesses.</p> <p>While the Applicant acknowledges that in some cases, there may be residual adverse effects on some affected businesses, the scale of harm has been reduced where practicable and managed through embedded mitigation and flexible, responsive and in some cases bespoke measures secured by management plans</p>	Buckinghamshire Council's position is unchanged, pending further discussion and resolution of concerns raised by non-agricultural businesses directly affected.
10.10	4.13.28	<p>Comment that the Applicant's Response to Relevant Representations suggests that views of businesses most affected have been considered, but TCS Biosciences and Hogshaw Farm and Wildlife Park have both highlighted negative impacts.</p> <p>Further comment that the Council is keen to see these and other businesses supported, and to understand whether the mitigations and proposed amendments are sufficient to alleviate the concerns of these businesses, or if more work is required.</p> <p>Further comment that ongoing discussions are encouraged.</p>	<p>The Applicant's position in response to Buckinghamshire Council's reference to Relevant (and Written) Representations, and effects on TCS Biosciences Ltd and Hogshaw Farm and Wildlife Park are set out at:</p> <p>a) Item / line 10.1 of this table;</p> <p>b) The Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]; and</p> <p>The Applicant's Response to Written Representations (submitted at Deadline 2).</p> <p>The assessment of effects on businesses – including TCS Biosciences and Hogshaw Farm and Wildlife Park – have been considered within ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] drawing on individual topic-</p>	Comment noted. Please refer to Council's response at 10.3.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>specific assessment within the EIA.</p> <p>The Applicant recognises that there are residual significant adverse landscape and visual effects on two identified tourist-sector receptor businesses (Claydon House and Hogshaw Farm and Wildlife Park) – however it is noted that mitigation is in place to address these effects and reduce the significance as far as reasonably practicable.</p> <p>In terms of visual amenity experienced at Hogshaw Farm and Wildlife Park, mitigation planting to the eastern edge of Parcel 2, in the form of new tree belts and hedgerows established to 3.5m, would provide some additional screening and filtering of views to the lower levels of the Proposed Development. Embedded mitigation also includes a 15m width belt of structural native woodland (early) planting along the southern boundary of Fields D8, D9, D19 and D26.</p> <p>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.</p> <p>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</p> <p>[EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] at</p> <p>Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd.</p> <p>Such management plans also include details of mitigation measures – including the management of environmental effects, monitoring and engagement protocols, and traffic management (in the Outline CTMP [EN010158/APP/7.5.3]) as well as ecological and landscape interpretation measures (in the Outline LEMP [EN010158/APP/7.6.3]) and access improvements (in the Outline RoWAS [EN010158/APP/7.8.3]) that will manage the potential for adverse effects that could otherwise affect the operation of businesses.</p> <p>It is noted that in each case, Buckinghamshire Council will be the discharging authority for the management plans.</p>	
10.11	4.13.29-31	<p>Comment requesting the detailed examination of TCS Biosciences and Preston Farms as sensitive receptors given the importance of their work and how the Proposed Development could impact this, expressing concern over significant socio-economic effects that the Proposed Development may have on the businesses.</p> <p>Further comment noting that the evidencing of such</p>	<p>The Applicant's position in response to Buckinghamshire Council's concern about effects on and mitigation for Prestons' Farm and TCS Biosciences Ltd are set out in the response to paragraph 4.6.20 and 4.6.1 of the LIR above in Table 4-10.</p>	<p>Refer to corresponding BC responses earlier in this table.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		effects is ultimately down to TCS Biosciences and Preston Farms to provide comment as Interested Parties, but Buckinghamshire Council invites the Applicant to provide further mitigation and give more consideration to these negative socio-economic effects.		
10.12	4.13.31	<p>Comment inviting the Applicant to further consider how changes to the Draft Development Consent Order and relevant Plans might achieve mitigation for impacts on businesses.</p> <p>Further comment recognising that some information is likely to be commercially sensitive and so Buckinghamshire Council invites the Applicant to work with TCS Biosciences and Preston Farms to look at ways to address sensitivity whilst also putting evidence in front of the ExA, as required.</p>	The Applicant's position in response to Buckinghamshire Council's concern about effects on and mitigation for Prestons' Farm and TCS Biosciences Ltd are set out in the response to paragraph 4.6.20 and 4.6.1 of the LIR above in Table 4-10.	Refer to corresponding BC responses earlier in this table.

Table 3-11: Soils

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Effects on Soils, Including Best and Most Versatile Agricultural Land				
11.1	4.9.5	<p>Comment that the assessment of impacts to soil resources oversimplifies soil ecosystem services by omitting key issues like soil hydrology and drainage. Further comment noting that the sensitivity of 'soil ecosystems' has been assigned based on texture and field capacity days, which is actually an indicator of resilience to structural damage.</p>	<p>Soil ecosystem services have not been assessed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] as the Applicant's assessment was undertaken and issued as part of the DCO Application in September 2025, prior to the publication of the IEMA (now ISEP) Guide: A New Perspective on Land and Soil In Environmental Impact Assessment in January 2026. Industry best practice requires an ALC survey to inform the soils assessment which has been undertaken and is detailed in ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3.2] [AS-022].</p> <p>The term 'soil structure' is a more appropriate term for what is currently assessed within ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]. The receptor term will be updated for Deadline 2 for clarification.</p> <p>Drainage and hydrology are assessed within ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038].</p>	<p>The IEMA guide was published in 2022, not 2026. However, while the Applicant states that they were unable to include IEMA guidance in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2], they have actually included it in Table 12.5 of Revision 1 and Table 12.6 of Revision 2 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].</p> <p>The Applicant states that they have updated the term "ecosystem services" to "soil structure" in revision 2 but this is not the case and ecosystem services are referred to throughout the document. The Applicant should revise ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] to correctly refer to the soil structure receptor that they are assessing.</p> <p>Within paragraph 12.6.8 of revision 2 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2], the Applicant explains that they have not specifically assessed "Ecological habitat, soil biodiversity and platform", "Soil carbon", "Soil hydrology" and "Archaeology, cultural heritage, community benefits and geodiversity for landscape" because these aspects are accounted for within ALC grading. This is not the case and for example, archaeological factors do not contribute to the ALC grade of the land. The Applicant may wish to reference other ES chapters that do address these ecosystem services.</p> <p>It is noted that although the Applicant stated in Revision 1 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] that PINS requested for soil ecosystems to be scoped into their assessment, this has been amended in Revision 2 to refer to soil structure. In ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4], PINS requests that the assessment takes account of soil resources and Buckinghamshire Council is satisfied that soil structure sufficiently considers soil resources.</p>
11.2	4.9.24	<p>Comment that the Environmental Statement does not provide detail on how much land is required for each element of the Proposed Development and that it also does not provide a breakdown of the Proposed Development in terms of the temporary construction activities.</p>	<p>A breakdown of ALC grades and areas of land for the key infrastructure including the Rosefield Substation and BESS alongside temporary activities has been included in the updated ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] submitted at Deadline 2.</p>	<p>Buckinghamshire Council welcomes the breakdown of ALC grades in Table 12.4. However, the breakdown is unclear due to an error in formatting and the areas do not align with the correct columns.</p>
11.3	4.9.25 and 4.9.26	<p>Comment that it is unclear how much soil across the 647 ha of land will be retained in a functional state during the operational phase given that the Applicant has not included details on each element. Further comment that the Applicant has not provided</p>	<p>A breakdown of ALC grades and area of land for the key infrastructure including the Rosefield Substation and BESS alongside temporary activities has been included in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] at Deadline 2. It</p>	<p>Buckinghamshire Council welcomes the mitigation measures in place to protect soils during construction, operation and decommissioning. However, Table 12.4 is unclear due to an error in formatting.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		<p>details on how much land would be involved in the return to agricultural land use, its ALC grade, or how ALC would be secured. Further comment that a clear strategy should be set out.</p>	<p>should be noted that several fields within the Order Limits required for the installation of cabling will be retained for agricultural use once the cables have been installed, following the construction phase.</p> <p>By following good practice and mitigation measures secured within the Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.3] the agricultural land will be reinstated and returned to the same ALC grade as prior to the installation of the Proposed Development. Following the decommissioning phase, the land would be returned to the landowner in good condition.</p> <p>Avoiding compaction and damage during construction and decommissioning are the main mitigation strategies to prevent long term damage to the soil. If damage does occur, amelioration will be used as outlined in sections 3.6 and 3.7 of the Outline SMP [EN010158/APP/7.7.3]. Industry best practice will be used at the time of decommissioning to ensure soil profiles are being retained and returned to prior use. An aftercare and monitoring plan has also been developed in discussion with Natural England as secured in section 13 of the Outline SMP [EN010158/APP/7.7.3].</p>	
11.4	4.9.31	<p>Comment noting that the field capacity days are based on a dataset from 1988 so slowly permeable clay and heavy clay loams with a wetness class of IV should be considered to have high sensitivity to structural damage and extra precautions taken during soil handling, particularly when proposals include topsoil trafficking.</p>	<p>The dataset used is the same dataset used for all ALC and soil resource grading to ensure that the grading is comparable across the country. It is recognised that due to the effects of climate change there can be differences not accounted for in the 1988 dataset. However, the advice from Natural England is to still use the same comparable dataset until it is updated nationally. Through following the Defra (2025) ALC criteria and Defra (2009) Construction Code of practice for the sustainable use of soils on construction sites, the soil structure (soil ecosystems) is considered to be medium sensitivity as detailed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].</p>	<p>The Defra (2025) ALC criteria and Defra (2009) Construction Code of practice for the sustainable use of soils on construction sites do not assign criteria for sensitivity.</p> <p>The two guidance documents that outline criteria for assigning sensitivity to structural damage are the IEMA (2022) A New Perspective on Land and Soil In Environmental Impact and the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings.</p> <p>It is requested that the Applicant follows Table 2 in the Institute of Quarrying Guidance in the Outline SMP [EN010158/APP/7.7.3] to classify the soils as low resilience to handling as per Table 2. The heavy textures of the soils on site are further compounded by the fact that the soils on site have a weakly developed structure and are non-calcareous, making them more susceptible to compaction, as stated on page 16 of the Institute of Quarrying guidance. It is important that the Outline SMP [EN010158/APP/7.7.3] does not treat the soils as having a greater resilience than they do.</p> <p>For the purposes of the EIA assessment in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2], Buckinghamshire Council acknowledges that the soils on the site can be considered medium sensitivity due to field capacity days and texture as per the EIA method in the IEMA guidance. However, it is requested that the Applicant follows the Institute of Quarrying Guidance in the Outline SMP [EN010158/APP/7.7.3].</p>


Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
11.5	4.9.32	Comment on the trafficking and inaccessibility of top soil during the lifetime of the Proposed Development, and the difficulty in return to biomass production to support agriculture given the nature of soils involved and the Applicant not demonstrating their understanding of this in the assessment or Outline SMP.	Trafficking over topsoil will be minimal and, if required, only low pressure ground vehicles will be used. An aftercare and monitoring plan has also been developed in discussion with Natural England as detailed and secured in section 13 of the Outline SMP [EN010158/APP/7.7.3] to ensure soil biomass is considered.	Buckinghamshire Council notes the use of low pressure vehicles.
11.6	4.9.33	Comment highlighting the need for the risks to soils to be reassessed to provide more direct justification for proposing that topsoil be trafficked in winter, due to the accessibility restrictions in winter months which have not been considered.	Whilst the soil texture across the Site are heavy textures, the field capacity days (FCD) across the Site are 136-142. Therefore as the FCD are below 150 the topsoil classification is Unit B (Orange). The soil classifications are correct and cross-validated between multiple trained surveyors and lab analysis. Mitigation measures related to wet conditions for soils have been set out and secured within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] which have been agreed by Natural England as set out in the Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] . Soils will also not be worked when they are above the plasticity limit as detailed in Outline SMP [EN010158/APP/7.7.3] .	Buckinghamshire Council welcomes the application of the field test to ensure soils are not worked when they are above the plastic limit. However, it is requested that the Applicant highlights the importance of treating the soils with care by applying the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings in the Outline SMP [EN010158/APP/7.7.3] . As per Table 2, the clay and heavy clay loam textures of the soils on site are considered to have low resilience to structural damage and this is further compounded by the fact that the soils on site have a weakly developed structure, are non-calcareous and considered Wetness Class IV, making them more susceptible to compaction. It is important that the Outline SMP [EN010158/APP/7.7.3] does not overestimate the resilience of the soils.
11.7	4.9.34	Comment noting that current agricultural drainage across the land has not been discussed. Further comment on the need for an assessment of the current land drainage status to determine if it is adequate to support the operational phase of the Proposed Development.	The Defra 2025 ALC Guidance (JP-069) assumes that it is possible to install an adequate system of field drains. It is not a requirement that the field drainage system has already been installed nor that such a system is currently in a state of good maintenance. The ALC system grades the potential capacity of the land within the parameters that certain agricultural practices (including installing new or maintaining existing field drains, where required) are feasible. Deterioration of field drains can be mitigated by repair or replacement without any impact on the fundamental soil quality. Therefore, agricultural drainage does not have an impact on ALC grading. Additionally, as mentioned within Outline SMP [EN010158/APP/7.7.3] paragraphs 5.3.8, 5.4.8, 5.5.2 and 6.3.7, land drains will be restored so will have no impact on agricultural soil quality.	If present, the agriculture drainage system for the land is fundamental to protecting soils during all phases of the development and for ensuring that they can support the proposed development over the operational period. These systems require maintenance and renewal and a discussion on the presence and current condition of the land drainage system, and on its suitability to support the land access requirements for the construction, operational and decommissioning phases is appropriate. Land drainage is relevant to understanding the implications of an ALC determination and what additional land management activities, such as land drainage, are required to ensure that the future baseline for soil quality and functionality is predicable over the operational period. Buckinghamshire Council recognises that consideration of agriculture drainage is not a requirement for an ALC determination. It is also noted that consideration of the <i>potential</i> risks of land drainage failure is already covered in the ES.
11.8	4.9.39	Comment that the Applicant has not demonstrated a comprehensive understanding of soil ecosystem services, and it is noted that these risks have been understated in the assessment.	Soil ecosystem services have not been assessed in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] as the Applicant's assessment was undertaken and issued as part of the DCO Application in September 2025, prior to the publication of the IEMA (now ISEP) Guide: A New Perspective on Land and Soil In	The IEMA guide was published in 2022, not 2026. However, while the Applicant states that they were unable to include IEMA guidance in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] , they have actually included it in Table 12.5 of Revision 1 and Table 12.6 of Revision 2 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] .

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Environmental Impact Assessment in January 2026. Industry best practice requires the need for the ALC survey to inform the soils assessment which has been undertaken and is detailed in ES Volume 3, Figure 12.1: Agricultural Land Classification [EN010158/APP/6.3.2] [AS-022].</p> <p>The term 'soil structure' is likely a more appropriate term for what is currently assessed with ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]. The receptor term has been updated for Deadline 2 for clarification.</p>	<p>The Applicant states that they have updated the term "ecosystem services" to "soil structure" in revision 2 but this is not the case and ecosystem services are referred to throughout the document. The Applicant should revise ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] to correctly refer to the soil structure receptor that they are assessing.,</p> <p>It is noted that although the Applicant stated in Revision 1 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] that PINS requested for soil ecosystems to be scoped into their assessment, this has been amended in Revision 2 to refer to soil structure. In ES Volume 4, Appendix 5.3: EIA Scoping Opinion Response Matrix [EN010158/APP/6.4], PINS requests that the assessment takes account of soil resources.</p> <p>Within paragraph 12.6.8 of revision 2 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2], the Applicant explains that they have not specifically assessed "Ecological habitat, soil biodiversity and platform", "Soil carbon", "Soil hydrology" and "Archaeology, cultural heritage, community benefits and geodiversity for landscape" because these aspects are accounted for within ALC grading. This is not the case and for example, archaeological factors do not contribute to the ALC grade of the land.</p> <p>Buckinghamshire Council would recommend that a commentary is provided and reference made to an appropriate chapter covering each of the aspects outlined in Table 12.6 of the ES chapter [Rep2-031] ("ecological habitats, soil biodiversity and platform for landscape", "soil carbon", "soil hydrology", "Archaeology, cultural heritage, community benefits and geodiversity for landscape"). If no other chapter covers these aspects, a sensitivity should be assigned to these soil receptors.</p>
Adequacy of soil Management				
11.9	4.9.4	<p>Comment stating that due to the clay dominated soil profile, it is recommended that soils be classified as high risk. Further comment suggesting additional mitigation measures such as imposing a seasonal constraint on construction activities to minimise degradation.</p>	<p>Whilst the soil textures across the Site are heavy, the field capacity days (FCD) across the Site are 136-142. Therefore as the FCD are below 150, the topsoil classification Unit B (orange). The soil classifications are correct and cross-validated between multiple trained surveyors and lab analysis. Mitigation measures related to wet conditions for soils have been set out and secured within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] which have been agreed by Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]. Soils will also not be worked when they are above the plasticity limit as detailed in Outline SMP [EN010158/APP/7.7.3].</p>	<p>Buckinghamshire Council welcomes the application of the field test to ensure soils are not worked when they are above the plastic limit.</p> <p>However, it is requested that the Applicant highlights the importance of treating the soils with care by applying the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings in the Outline SMP [EN010158/APP/7.7.3]. As per Table 2, the clay and heavy clay loam textures of the soils on site are considered to have low resilience to structural damage and this is further compounded by the fact that the soils on site have a weakly developed structure, are non-calcareous and considered Wetness Class IV, making them more susceptible to compaction. It is important that the Outline SMP [EN010158/APP/7.7.3] does not overestimate the resilience of the</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
				soils.
11.10	4.9.10 and 4.9.28	Comment that the Outline SMP currently lacks detail on who will be responsible for ensuring measures are complied with and implemented.	References to when a suitably trained person or soil scientist are required have been provided within Outline SMP [EN010158/APP/7.7.3] paragraphs 2.2.7, 3.1.6, 3.2.4, 5.3.10, 5.4.4, 5.4.9, 5.4.10, 5.4.14, 6.3.2, 8.3.9, 8.4.4, 8.4.8, 8.4.10, 8.4.13, and 13,1,1. Further detail on responsibility will be provided within the detailed Soil Management Plan which will be agreed with Buckinghamshire Council prior to construction.	Buckinghamshire Council accepts this amendment.
11.11	4.9.23	Comment noting that impacts on BMV should be minimised, and that best practice measures should also be incorporated to achieve this. Further comment noting that field surveys should be used to establish the ALC grades and identify the soil types to inform soil management.	BMV has been minimised wherever possible, through the iterative design development and it is noted that only 1.51% of the entire Site is classified as BMV. Field surveys have been used to determine ALC grades and soil types, the findings of the survey are found within ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.2] . The consideration of mitigation measures that are used are set out and secured in Outline SMP [EN010158/APP/7.7.3] .	Thanks to the breakdown of ALC grades provided in Revision 2 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] , Buckinghamshire Council welcomes that the hard infrastructure such as the BESS has been sited on non-BMV land. However, Table 12.4 containing the breakdown should be amended to ensure clear formatting and figures in the correct columns.
11.12	4.9.27	Comment on the limited construction methods detailed to inform on impacts on soil resources, with no detail on the land take and construction methods for differing elements of the Proposed Developments design.	A breakdown of ALC grades and area of land for the key infrastructure, including the Rosefield substation and BESS alongside temporary activities, has been included in the ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] at Deadline 2. The construction methods for each element of the Proposed Development and the associated mitigation measures are set out within Outline SMP [EN010158/APP/7.7.3] .	Buckinghamshire Council notes that further detail has been provided in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] at Deadline 2 and will be provided in the detailed soil management plan.
11.13	4.9.29	Comment that there are no details about how measures relating to the handling of soil during heavy rainfall, noting that the Applicant has not proposed a seasonal constraint on construction activities.	Mitigation measures to protect the soil during handling during heavy rainfall have been considered and are detailed within paragraph 3.2.3 of the Outline SMP [EN010158/APP/7.7.3] . These have been agreed by Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] . Within the Outline CEMP [EN010158/APP/7.2.3] in table 3.7 there are mitigation measures that will be monitored by the Principal Contractor that commit to the timing of the works to be managed carefully to consider weather conditions, particularly heavy and persistent rain to minimise vehicles travelling across Site when soil conditions are wet.	Buckinghamshire Council accepts this response.

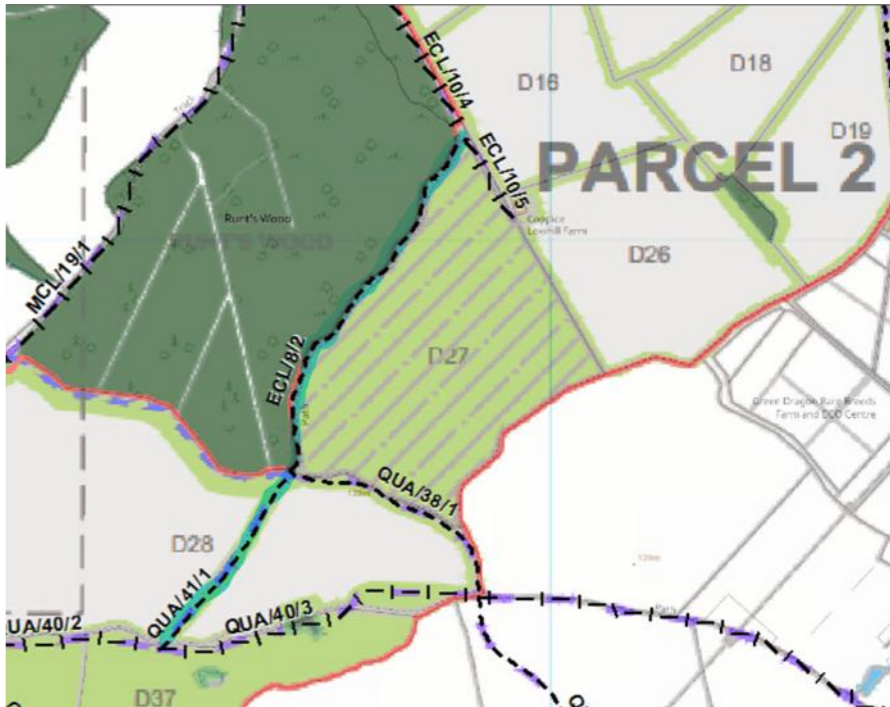
Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
11.14	4.9.30	Comment recognising that a detailed SMP will be provided, but that more detail on key roles and responsibilities must be provided at the outline stage.	References to when a suitably trained person or soil scientist are required have been provided within Outline SMP [EN010158/APP/7.7.3] paragraphs 2.2.7, 3.1.6, 3.2.4, 5.3.10, 5.4.4, 5.4.9, 5.4.10, 5.4.14, 6.3.2, 8.3.9, 8.4.4, 8.4.8, 8.4.10, 8.4.13, and 13,1,1. Further detail on responsibility will be provided within the detailed Soil Management Plan which is secured via DCO Requirement and must be approved by Buckinghamshire Council prior to commencement of development.	Buckinghamshire Council accepts this amendment.
11.15	4.9.40	Comment that the Outline SMP needs to contain stronger protection measures.	The Applicant disagrees with this comment and has included thorough protection measures to avoid and reduce impacts to soil within the Outline SMP [EN010158/APP/7.7.3] . These have been discussed and agreed with Natural England as set out in Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]	It is requested that the Applicant highlights the importance of treating the soils with care by applying the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings in the Outline SMP [EN010158/APP/7.7.3] . As per Table 2, the clay and heavy clay loam textures of the soils on site are considered to have low resilience to structural damage and this is further compounded by the fact that the soils on site have a weakly developed structure, are non-calcareous and considered Wetness Class IV, making them more susceptible to compaction. It is important that the Outline SMP [EN010158/APP/7.7.3] does not overestimate the resilience of the soils.

Table 3-12: Transport and access

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Effects on the Road Network and Road Users				
12.1	4.7.2 and 4.7.52	<p>Comment that changes to PRoW may on occasion cause inconvenience but it is not thought that they would discourage use. Further comment recommending further changes to the Proposed Development that remove dead ends. Further comment acknowledging enhancements are already being made but that further opportunities are available and should be taken. Further comment confirming that the alternative routes are acceptable to Buckinghamshire Council.</p>	<p>The Applicant thanks Buckinghamshire Council for its agreement that whilst proposed changes to PRoW may cause some inconvenience, this is not likely to discourage use, and for acknowledging that a number of enhancements are being made by the Applicant.</p> <p>The following application documents were amended at Deadline 1 to correct the dead end PRoW identified by Buckinghamshire Council at Ponds Farm:</p> <ul style="list-style-type: none"> • Draft DCO [EN010158/APP/3.1.4]. • Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]. • Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]. • ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]. • ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3.2] [REP1-049]. • Outline RoWAS [EN010158/APP/7.8.3]. <p>Further information is provided in relation to suggested opportunities/enhancements in response to paragraphs 4.7.55/4.7.65, 4.7.56/4.7.62 and 4.7.63 of the LIR below.</p>	<p>The Council has reached an agreed position with the permanent diversion route north-west of Pond Farm. The proposed arrangement is pink:</p>  <p><i>Pink = proposed new footpath Black = Proposed deleted footpath.</i></p> <p>The concern was twofold: 1] relocating the path to the field edge of Calvert Road left the footpath vulnerable to being fenced off against the hedge. Fencing paths leaves a greater maintenance liability for the council to trim the corridor which would otherwise be grazed by cattle or cut as a hay crop; and 2] a double fenced path means walkers feel constrained and the inevitable overgrowth adds to the inconvenience. The assurance provided by the applicant is: 'adding a design commitment that would mean the applicant we wouldn't be able to install a fence along the diverted footpath [within Field B5 – see plan] for the operational period of Rosefield Solar Farm. This would be included within the Design Commitments [EN010158/APP/5.9.4] [REP2-010], which is a secured document.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
12.5	4.7.46	<p>Comment on the outstanding requirement for the provision of a complete swept path analysis from the A41 to the Site's access locations, and a breakdown of traffic volumes during peak hours. Further comment requesting local junction modelling which has not been provided yet and that provision of this remains necessary.</p>	<p>Details of the areas of constraint on the access route have already been provided in Annex 2 of the Outline CTMP [EN010158/APP/7.5.3], which considers the worst-case swept path for vehicles using the access route to and from the A41 corridor.</p> <p>Peak flow traffic figures will be provided to Buckinghamshire Council along with a peak hour assessment of the Station Road/A41 junction. This will be provided by Deadline 3.</p>	<p>The Council awaits the Deadline 3 submission.</p>
12.6	4.7.48	<p>Comment that traffic signal controls would introduce unquantified delays and that no assessment has been made for the possibility of two-way traffic to be accommodated at either end of the signals were queues of waiting traffic will form. Further comment that the Transport Assessment has made no assessment of the delay, and that if this approach is to be pursued a full update of the Transport Assessment is required.</p>	<p>Article 17 of the Draft DCO [EN010158/APP/3.1.4] gives the Applicant the power to temporarily place traffic signs and signals in the extents of the roads specified in Schedule 8 (traffic regulation measures). Schedule 8 identifies the relevant roads and specifies the extents of the roads that will be subject to the various controls, and the specific measures that are required to safely regulate traffic during the construction of the Proposed Development. The necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4]. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the Temporary Traffic Management (TTM) points referred to in Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions.</p> <p>Article 17 also includes general powers that would authorise other temporary traffic regulation measures, for the purposes of the construction or decommissioning of the Proposed Development. The inclusion of these powers is justified as they allow a degree of flexibility to respond to changing conditions on the road network over the lifetime of the Proposed Development, and importantly, are appropriately regulated because the power in Article 17(2) may only be exercised with the consent of the traffic authority concerned, and power in paragraph (3) is directly related to the power in paragraph (2).</p> <p>The traffic control required is over a short length of road and not over the full area. The expected delay will be minimal and dependant upon the traffic management required by</p>	<p>The Applicant has provided a draft wording related to this issue. Following discussions at ISH1 the Council and the Applicant will meet further in respect of this issue and the OCTMP.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<p>Buckinghamshire Council. From previous experience, the average delay for traffic signals associated with the construction of an access junction will be circa two minutes. This level of temporary delay, occurring at the start of construction activities on the network, is not considered significant.</p> <p>ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131] provides an assessment of the worst case traffic generation period, where the junction works will have been completed.</p>	
12.7	4.7.49	<p>Comment that swept path analysis is required, showing safe operation of the whole access routes with the full potential traffic management schemes in place.</p>	<p>The Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. As noted above, the necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4]. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions. Given the Applicant will only be closing a small distance within the wider siting zone, no swept path reviews through control junctions are considered necessary.</p> <p>Swept path assessments at the points of constraints from the A41 to site have been undertaken and are presented in Annex 2 of the Outline CTMP [EN010158/APP/7.5.3].</p>	As above.
12.10	4.7.53	<p>Comment that the permanent footpath diversion at Pond Farm is unacceptable given it adds a dead- end which would impact on recreational value and legibility as well as an impact on desire-lines.</p> <p>Buckinghamshire Council awaits the Applicant's proposed revisions.</p> <p>The diversion also creates a right-angle bend beside Calvert Road, an arrangement to which the Council disagrees with as it is sub-optimal as walkers follow desire-lines. An alternative solution to remove the right-angle bend has been recommended by the Council.</p>	<p>A number of application documents were amended at Deadline 1 to correct the dead-end PRoW identified by Buckinghamshire Council at Ponds Farm, reducing the length of PRoW SCL/12/2 that is stopped up and connecting the stretch of SCL/12/2 that runs through the Ponds Farm complex to the permanently diverted route to the west. This will maintain connectivity and prevent a dead end. The following application documents were amended at Deadline 1 to correct the dead end PRoW identified by Buckinghamshire Council at Ponds Farm:</p> <ul style="list-style-type: none"> • Draft DCO [EN010158/APP/3.1.4]. • Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]. • Illustrative Layout Plans and Sections [EN010158/APP/2.6.3] [REP1-007]. 	Now resolved – see 12.1.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			<ul style="list-style-type: none"> • ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1- 034]. • ES Volume 3, Figure 3.10: Existing and Proposed PRow and Permissive Footpaths [EN010158/APP/6.3.2] [REP1- 049]. • Outline RoWAS [EN010158/APP/7.8.3]. <p>The right-angle bend was not highlighted by Buckinghamshire Council in its Relevant Representation and the Applicant is not aware of the alternative solution that has been proposed by the Council. The Applicant will liaise with Buckinghamshire Council on this point.</p>	
12.12	4.7.56 and 4.7.66	<p>Comment recommending connecting an existing dead-end bridleway [QUA/41/1] onto a footpath [SCL/8/2], including upgrades for passage of horse riders and cyclists. Further comment recommending accessible gates to improve mobility.</p> <p>Buckinghamshire Council would welcome this being secured in the Outline Rights of Way and Access Strategy.</p>	<p>As the Applicant set out on page 78-79 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Applicant is not proposing to upgrade footpath ECL/8/2 (SCL/8/2 in the Local Impact Report is a typo) to a bridleway. However, consideration is being given to the potential for creating a bridleway link in this vicinity that would be accessible to the public during the operation (including maintenance) phase and will be discussed further with Buckinghamshire Council.</p> <p>As the Applicant set out on page 79 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], the Outline LEMP [EN010158/APP/7.6.3] secures the need to check stiles and gates at the detailed design stage to ensure they are safe and operationally effective, which would include consideration of accessibility. However, the Outline RoWAS [EN010158/APP/7.8.3] has been updated at Deadline 2 to secure review of the location of stiles across the Site and consideration of their accessibility during the detailed design.</p>	<p><u>Upgrade Footpaths SCL/8/2 and QUA/41/1 to bridleway in Field D27</u></p> <p>This would resolve a long-standing dead-end bridleway [since the first definitive map - relevant date 1953] and connect a disjointed network which the Rights of Way Improvement Plan identified was an issue in the county. The applicant has offered a bridleway 'for the lifetime of the development' which is accepted, as opposed to dedication of a public bridleway in perpetuity – see blue highlight on plan. See also the Council's submissions at ISH1.</p> 

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
12.15	4.7.62 to 4.7.64	Comment asking the Applicant to reconsider diverting Bridleway QUA/41/1 to resolve dead-end route and maximise opportunities to facilitate enhancements that benefit horse riders and cyclists, who are excluded from the permissive footpath network. Buckinghamshire Council indicate that this has strong policy support from para 105 NPPF, Policy C4 of VALP, and the Bucks Rights of Way Improvement Plan.	See response to the first part of paragraph 4.7.55 of the LIR above.	Resolved – see 12.12.
Adequacy of Construction Traffic Management				
12.17	4.7.1	Comment that Buckinghamshire Council has previously raised concerns about construction related impacts, and that they still hold the position that certain information and controls remain outstanding. Further comment about concerns over the proposed use of temporary traffic signals, and that further information is needed.	<p>The Applicant is grateful to the Council for continuing dialogue on transport matters and notes that several items have already been addressed in the Outline CTMP [EN010158/APP/7.5.3]. Ongoing dialogue will continue on any further matters of concern.</p> <p>With regards to traffic signals, the Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. The necessary extent of the temporary traffic signals are set out in Part 2 of Schedule 8 of the Draft DCO [EN010158/APP/3.1.4]. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in Part 2, only a small distance within those wider zones. For the avoidance of doubt and as described within Part 2, the Applicant will not be undertaking works which require temporary traffic signals outside those required for the formation of the access junctions.</p> <p>Further information relating to peak hour traffic flows and junction modelling will be provided at Deadline 3.</p>	The Council awaits review of the draft DCO at Deadline 3 and further discussions with the Applicant including on the OCTMP.
12.19	4.7.41	Comment on the submissions needed prior to the undertaking of construction works including a programme for the works, details of construction methods and traffic management, drawings and specifications, health and safety information, details of the proposed contractor, a Road Safety Audit (if required), details of signage and road markings, and details of any proposed remediation proposals should works be temporary.	The measures are already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.9.	Following Deadline 3 the Council will engage with further discussions with the Applicant in relation to this and other highways matters.
12.20	4.7.42	<p>Comment that the Applicant will reimburse the highway authority for the technical approval process at the time the applications are made, and that these applications will be in line with similar S278 or S184 applications also made under the Highways Act.</p> <p>Further comment that detailed CTMP will detail the process for</p>	This commitment is already included in the Outline CTMP [EN010158/APP/7.5.3] in paragraph 3.5.10.	The Council has seen some draft wording in relation to this issue. The Council will engage in further discussions with the Applicant after Deadline 3.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
		these technical approvals.		
12.22	4.7.44	Comment noting that comment in the above paragraphs of the LIR do not enable a bond to be taken through a S278 agreement which allows the Highway Authority to safeguard against works that don't meet adoptable standards. Further comment that provision is required within the draft DCO.	The Applicant is proposing a hybrid solution where the Council can secure all necessary agreements and fees. Under Article 16 within Part 3 of the Draft DCO [EN010158/APP/3.1.4] , the undertaker may enter into an agreement with the street authority in respect of highway works carried out under powers conferred by the Order. It is the Applicant's expectation that these works would be the subject of such an agreement which could require the provision to the Council of reasonable security for completion of the works.	As above.
12.23	4.7.47	Comment on Schedule 8 Part 2 of the draft DCO that there is concern that the temporary traffic signals are not set out in the Transport Assessment. Further comment that the proposal for up to 1.12km length of public highway to be under temporary traffic signal control is unacceptable without assessment or justification.	The Draft DCO [EN010158/APP/3.1.4] provides for the general ability to introduce traffic signal control to make good any road repairs or to enable the construction of the access junctions. In particular, Article 17 (Traffic regulation measures) provides the undertaker with powers to temporarily change speed limits and place temporary traffic signs and signals in the extents of the roads specified in Schedule 8 (traffic regulation measures). Schedule 8 Part 2 identifies the relevant roads and specifies the extents of the roads that will be subject to temporary traffic signals. The distances provided in column 2 of the table at Part 2 are the siting zone for the temporary traffic signals. The Applicant will not be closing the full distance between the TTM points referred to in Part 2, only a small distance within those wider zones. These measures are justified and required to safely regulate traffic during the construction of the Proposed Development. The powers are commonly included in orders granting permission for infrastructure projects where it is necessary and in the interests of public safety during construction of the Proposed Development for the developer to put in place some temporary restrictions on road usage.	As above.

Table 3-14: Other Matters

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
Assessment of, and Effects from the Proposed Battery Energy Storage Systems				
14.13	4.12.2	<p>Comment noting that Buckinghamshire Council would like to seek clarity on operational traffic movements and the enforceability of staff minibus arrangements, to ensure that traffic-related air quality impacts remain within the parameters assessed. Further comment that should the enforcement of the minibus arrangements not be made, then Buckinghamshire Council would wish to see the air quality assessment updated to reflect the correct number of staff/LDVs arriving on Site.</p>	<p>The operational traffic volumes are noted in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], which states that "The average number of trips per day would be less than twelve trips per day, which is the equivalent to traffic impact of between 2% and 3% between the A41 and the main Site access junction on Claydon Road.</p> <p>During the operation of the Site, it may be necessary to replace panels or BESS units (in full or replace parts) as part of rolling lifetime enhancement plan. The level of HGV traffic associated with this will be significantly lower than the peak of construction traffic and is expected to be circa 12 HGV movements per day.</p> <p>Staff travel via minibus for construction work is set out in Outline CTMP [EN010158/APP/7.5.3] and secured in the Draft DCO [EN010158/APP/3.1.4] and is therefore a legal requirement to provide.</p>	<p>This matter was the subject of submissions and discussions at ISH1. The matter will be picked up between the Council and the Applicant following Deadline 3.</p>
14.15	4.14.1	<p>Comment that Buckinghamshire Council has concerns over the effects of the Proposed Development on materials and waste. They consider that the Applicant has not provided enough detail of streams and volumes of construction materials/waste to see how it can be scoped out of assessment.</p>	<p>ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2 sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phases. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design.</p> <p>Mitigation measures in relation to waste management are secured within the Appendix 1 – Outline Site Waste Management Plan of the Outline CEMP [EN010158/APP/7.2.3] which is secured as a Requirement in the Draft DCO [EN010158/APP/3.1.4]. This would also form the basis for mitigation measures for waste management for the operation (including maintenance) and decommissioning phases of the Proposed Development, as detailed in and secured by the Outline OEMP [EN010158/APP/7.3.3] and Outline DEMP [EN010158/APP/7.4.3] which have been submitted in support of the DCO Application.</p>	<p>The Council welcomes updates to EN010158/APP/6.4.2. At some point before the next deadline a statement on the stone waste should be put in explaining that for construction it accounts for all the temporary compounds being removed (if it does) and that in decommissioning it accounts for all temporary and permanent compounds (if it does). Once this is complete, the Council consider this issue resolved.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
14.16	4.14.1	<p>Comment that Buckinghamshire Council agrees with the decision to scope out materials and waste from the EIA, but they request further evidence to support this issue. Further comment that the provision of requisite documents would be supportive.</p>	<p>The Applicant has provided detailed justification for scoping out material assets and waste from the ES within ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1] [APP-048].</p> <p>Alongside this, ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2 sets out the estimated quantities and types of waste produced during the construction, operation (including maintenance) and decommissioning phases. Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design.</p> <p>The Cumulative Waste Study, which formed Appendix 1 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] submitted at Deadline 1 and has been updated and submitted as Appendix 2 to this document at Deadline 2, provides detail on the cumulative impacts of waste arising from the Proposed Development alongside other solar schemes.</p> <p>Mitigation measures in relation to waste management are secured within the Appendix 1 – Outline Site Waste Management Plan of the Outline CEMP [EN010158/APP/7.2.3] which is secured as a Requirement in the Draft DCO [EN010158/APP/3.1.4]. Further detail on materials and waste management will be included in the detailed Construction Environmental Management which would be agreed with Buckinghamshire Council following the detailed design.</p>	<p>One issue is noted for the Cumulative Waste Study The assumption that future landfill void capacity will remain comparable to current levels is flawed; as an example, landfill capacity has reduced from 75,197,972 m3 in 2015 to 41,554,623 m3 in 2024.</p>
14.7	4.14.20	<p>Comment that Buckinghamshire Council requests clarity over the calculation of the waste streams, to confirm whether this is calculated per year or on an overall Proposed Development basis and does not include waste from the compound demobilisation.</p>	<p>The waste streams have been calculated for all phases of the Proposed Development over its intended design life of 40 years to provide overall waste volumes across the whole site and programme. This includes construction, operational (including maintenance) and decommissioning phases of the development. Please see the updated ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2.</p> <p>Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental</p>	<p>Noted and accepted following comments above.</p>

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			Management Plan following detailed design. These base calculations have been derived based on previous experience of other project sites	
14.20	4.14.22	Comment that Buckinghamshire Council are not in agreement with the Applicant's statement that there would be minimal packaging and office waste from the Proposed Development, with the majority of it being recycled. Further comment noting that 600 staff on-site would not result in 'minimal' waste	<p>The waste streams have been calculated for all phases of the Proposed Development over its intended design life of 40 years to provide overall waste volumes across the whole site and programme. This includes construction, operational (including maintenance) and decommissioning phases of the development. Please see the updated ES Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste [EN010158/APP/6.4.2] issued at Deadline 2.</p> <p>Further detail on the volumes of waste and streams will be provided in the detailed Construction Environmental Management Plan following detailed design. These base calculations have been derived based on previous experience of other project sites.</p>	<p>Indicative waste states it now includes 200kg per worker but not how many workers and then provides an overall Cardboard and Plastic volume which presumably combines worker waste with packaging although this is not made clear. It's also likely that workers will generate more than Cardboard and Plastic, such as food waste and septic tank waste – how has this been accounted for?</p> <p>Similarly, the Photovoltaic Module Packaging Waste and String Inverter Packaging Waste gives a figure of packaging waste per unit but not how many units, so hard to establish how the overall 199 tonnes of Cardboard and Plastic waste have been reached.</p>
14.21	4.14.24	Comment noting concern that a future baseline could have been estimated by extrapolating historic data forward. A baseline study area of the southeast, but without a zone of influence of only 10km seems at odds. Further comment noting that the current baseline merges together inert and non-hazardous waste and does not show hazardous at all, this should be split out as wastes, such as the PV panels, will be non- hazardous or may even be hazardous waste. It is also noted that data is only for decommissioning and does not cover construction (600 staff on their own will generate office type waste) and operation.	<p>There is no published data on future landfill capacity, and accurately predicting void capacity over the lifetime of the Proposed Development is not feasible. Cumulative Waste Study which formed Appendix 1 of the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] submitted at Deadline 1 and has been updated and submitted as Appendix 2 to this document at Deadline 2, operates under the assumption that future landfill void capacity will remain comparable to current levels. Additionally, under the assumption that the Waste Planning Authority will plan and allocate sufficient landfill capacity to meet future needs, in accordance with Section 3 of the National Planning Policy for Waste.</p> <p>The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on those who place solar panels on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery</p> <p>The data used to inform the baseline for the Cumulative Waste Study has been derived from the Environment Agency on landfill capacity 2024.</p> <p>In accordance with the Planning Inspectorate's Advice on Cumulative Effects Assessment, the search area has been determined by affording consideration to the Zone of Influence</p>	<p>See comment above about Cumulative Waste Study.</p> <p>All other comments noted and accepted.</p>

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			<p>of each environmental factor assessed within this ES. The South East region has been used as the study area as the study acknowledges that waste is not always processed within the Waste Planning Authority where it is generated and may instead be managed at a regional level.</p> <p>In relation to hazardous waste, it is not anticipated hazardous waste would be produced from the Proposed Development. As referenced within the Environmental Permitting Guidance – The Landfill Directive, inert waste may be placed in landfills for non-hazardous waste, provided it fulfils the appropriate criteria, in which inert waste typically does.</p> <p>The decommissioning phase formed the basis of the technical study as this is the phase that represents the highest waste generation during a solar farm development's lifetime. This is due to the removal of all Solar PV modules and associated infrastructure. In contrast, construction waste is significantly lower in volume, therefore, it is reasonable to assume the construction and operation phase waste arising would be substantially lower than the decommissioning phase total.</p> <p>Accordingly, the study estimates that under a worst-case scenario cumulative impact would result in 0.37% of regional landfill capacity to be required for the Proposed Development. It is therefore reasonable to conclude that the construction and operation phase would result in a materially lower landfill capacity requirement.</p>	
14.25	Table 5.1	Article 2(1) – Buckinghamshire Council raises concerns that all of Works No. 9 are to be permitted under preliminary works and they consider that there should be limitations on the extent of those works which can be properly described as preliminary should be explored further.	<p>As explained in the Explanatory Memorandum [EN010158/APP/3.2.3] at section 4.2.2, Work No. 9 (works to facilitate Work Nos. 1 to 8 and 10, being highway works including highway improvements and creation of accesses) has been included in the definition of “permitted preliminary works” as a response to the Applicant's experience from the implementation of another made solar DCO, where highway works have inadvertently triggered certain obligations that are not strictly necessary to be in place at the stage the highway works are being undertaken. In addition, the Applicant has carefully considered each requirement in Schedule 2 and specifically included Work No. 9 as part of “commence” where mitigation or management is needed with respect to that work. As such, sufficient controls are in place with respect to this works package and it is appropriate that it is a permitted preliminary work. The Applicant considers that it has provided sufficient justification for inclusion of Work No. 9 within the definition of “permitted preliminary works”, and notes that the Council has not identified any specific concerns regarding particular elements of Work No. 9 which are not appropriate</p>	Comments on the DCO were addressed in ISH2. Matters are not addressed further here.

Ref	LIR Para. Ref.	Summary Position	Applicant's Response	Buckinghamshire Council's Comments on Applicant's Response
			for inclusion in the definition. Should the Council wish to put forward suggestions for specific elements which should sit outside of the definition of "permitted preliminary works", with reasons, the Applicant would be happy to consider this further.	



