



AtkinsRéalis



# Rosefield Solar Farm (EN010158)

**Rosefield Solar Farm – Buckinghamshire Council's  
comments on Applicant's Updated Deadline 2 Documents**

Buckinghamshire Council

May 2026

## **Introduction**

This document sets out Buckinghamshire Council's review of the Applicant's updated submissions at Deadline 2. It should be read alongside the Council's Local Impact Report and subsequent written submissions, which remain unchanged unless explicitly stated.

The Council's overarching position on the Proposed Development is not altered by the updates submitted at Deadline 2. Where comments are provided, these are intended to assist the Examining Authority by identifying areas where further clarification, refinement or correction is required, and to progress technical matters through Examination.

The Council notes updates made by the Applicant and acknowledged where these provides clarification. However, agreement on individual technical points should not be taken as an indication that the Council's overall position on the acceptability of the scheme has changed.

**Applicant's Revised Documents submitted at Deadline 2**

Doc ref	Doc Title	Buckinghamshire Council Comments
<a href="#">REP2-025</a>	5.22.2 Draft Statement of Common Ground – Buckinghamshire Council (Tracked) (Rev 2)	<p>The Council notes that the draft SoCG will continue to be updated in line with documents submitted at Deadline 2 and does not highlight upcoming changes.</p> <p><b>Air Quality:</b> Applicant's response to 1-3 is accepted. The status can therefore be changed to agreed.</p> <p><b>Noise:</b> 9-2 There remains some slight disagreement on this point. Whilst the applicant's assessment methodology is accepted and no exceedances of the set level (35db) are anticipated, Buckinghamshire Council still has some concerns about real world impact on some residential receptors given the context and characteristic of the noise. Applicant's response to 9-5 is accepted. Paired with the updated Outline Construction Environmental Management Plan, specifically Table 3.8, Noise and vibration: Monitoring Requirements and Para 2.22.5 stating the applicant with consult with other developments in the area. Therefore happy for status to be changed to AGREED.</p> <p><b>Human Health:</b> additional point added [REP2-025, 10-2] to note disagreement of BC with the level of assessment and consideration that further assessment is required to consider local businesses, local employment, agricultural displacement and tourism. BC agrees that the addition is an acceptable reflection of the stakeholder comment. BC remains of the view that the overall level of assessment provided in [APP-057, updated by REP2-034] is insufficient.</p> <p>It is noted that the SoCG [REP2-025] does not yet capture the views of BC in respect of Population and Human Health as presented through the</p>

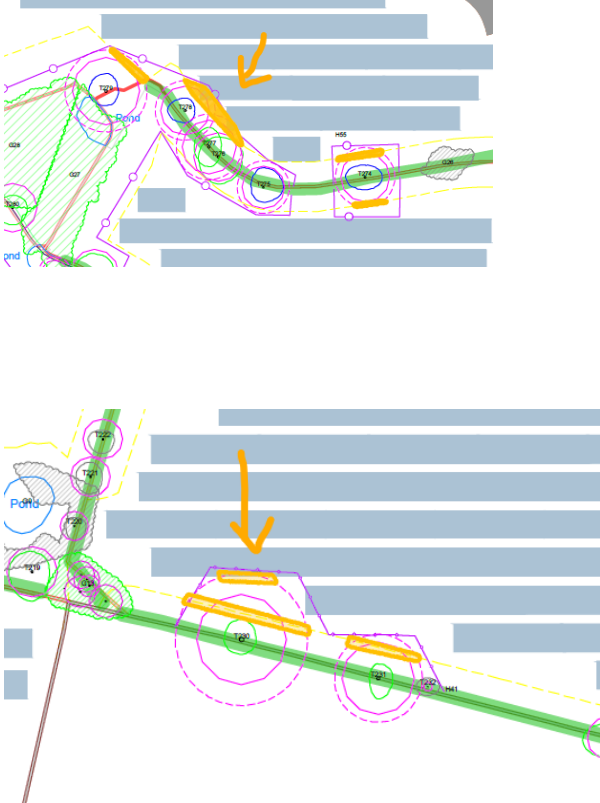
Doc ref	Doc Title	Buckinghamshire Council Comments
		<p>updated LIR [REP2-092] and response to ExA Questions [REP2-090], Q1.13.1 submitted to Examination at Deadline 2. BC will review further edits made by the Applicant in due course.</p> <p><b>Historic Environment/Cultural Heritage</b></p> <p>We have requested the assessment of Bernwood Farmhouse as we and the Applicant missed that is being considered as a candidate for Local listing by Buckinghamshire council. It was missed as it currently has no designation and does not appear in the Historic Environment Record for Buckinghamshire. The council consider that Bernwood Farmhouse is a non-designated heritage asset of low significance. Given the farmhouse's prominent position, the existence of long views towards it which appear to include elements of the solar farm, the way in which its architecture addresses its surroundings proximity to the BESS , PV arrays and other features, there would be less than substantial harm to the farmhouse at the upper end of the scale. Using EIA methodology the effects would be slight of a little above slight.</p> <p>St Mary's church seems to be omitted from the draft at Deadline 2, we disagree on the level of harm, identifying that it is in the middle of the scale of less than substantial harm (see also the Council's response to REP2-085).</p>
<a href="#">REP2-028</a>	6.2.2 Environmental Statement Volume 2, Chapter 9: Cultural Heritage (Tracked) (Rev 2)	<p>Botolph House is stated as grade II listed in all tables. It is grade II* listed. The assessment however in all tables acknowledges its significance as High, which is appropriate for its listing.</p> <p>Between Deadline 1 and 2 Buckinghamshire Council's specialist identified that Bernwood Farmhouse, Wier Lane, which is not in the Historic Environment Record, was already a candidate for local listing, although it</p>

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		<p>currently has no designation. The Council has requested that this be included in the assessment. Its significance is low.</p> <p>There is disagreement with the Applicant on the level of change for some receptors, based on differences in interpretation of the contribution of setting to significance and the degree to which screening mitigation proposals will lessen the severity of effects.</p> <p>Where these differences result in different identification of the levels of harm include:</p> <ul style="list-style-type: none"> <li>• Claydon House and park and the contribution of its wider setting including cumulative effects</li> <li>• All Saints Church</li> <li>• Pond Farmhouse</li> <li>• Rosehill Farmhouse</li> <li>• Blackmoorhill Farmhouse (Winter's Tale)</li> <li>• St Mary's Church</li> <li>• Setting of East Claydon (as a village of the same level of significance as Botolph Claydon)</li> <li>• Botolph House</li> <li>• Botolph Claydon Conservation Area</li> </ul> <p>In Table 9.15 "Summary of heritage assessment" construction and decommissioning activity is mentioned. Operation is not, although it is assessed for individual heritage assets in paragraphs 9.10.55 to 9.10.108.</p> <p>For more detailed responses on Bernwood Farmhouse, please see comments on REP2-025 above.</p>

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		For a detailed response on Botolph House please see the Council's response to REP2-085, row 4.17
<a href="#">REP2-032</a>	6.2.2 Environmental Statement Volume 2, Chapter 12: Soil (Tracked) (Rev 2)	<p>The Applicant has only updated the term “ecosystem services” to “soil structure” in one instance in Table 12.2 and the assessment continues to refer to “ecosystem services” throughout. 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>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> <p>It is noted that no update has been made to align the impact assessment on ALC Grade 2 land with the IEMA methodology that the Applicant set out to use. According to the IEMA methodology used (Table 12.8), the impact to Grade 2 land should be classed as minor, not negligible as stated within ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2] [APP-055]. This would bring the significance of effects up to a moderate adverse effect, which is significant. The Applicant has stated that the 3 ha area of grade 2 land is small compared to the total size of the development and that the project is predominantly sited on non-BMV land. However, this is not a</p>

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		justification to “dilute” the assessment of Grade 2 land simply because a large area of non-BMV land is also proposed to be developed. In absolute terms and according to standard methodology, the impact magnitude is minor and therefore the effect on Grade 2 land is moderate adverse.
<a href="#">REP2-034</a>	6.2.2 Environmental Statement Volume 2, Chapter 14: Population (Tracked) (Rev 2)	<p>Changes; <i>change to document names at 14.9.1 - Outline Rights of Way and Access Strategy [EN010158/APP/7.8.3]. BC notes that this has not been updated throughout the chapter (e.g. Table 14.1 references APP 7.8, rather than 7.8.3).</i></p> <p>Changes: Assessment of residual effects (with additional mitigation) Therefore, there is likely to be a temporary (<i>but long term</i>) slight adverse residual effect on other (non-agricultural) businesses and development land, which is considered to be not significant. This previously presented the timeframe as temporary <i>and permanent</i> (para. 14.10.16 [REP2-034]). <b>BC notes that during the course of the Examination, TCS Biosciences has provided clarifications of the business operations and its sensitivity to change, leading to expression of concern that the Applicant has not accurately assessed, nor addressed these concerns within the ES, as currently drafted. This additional information from TCS Biosciences raises questions about the accuracy of the statement at para.14.8.30 [REP2-034]; and the conclusions of the assessment of residual effects on non-agricultural businesses and development land at 14.10.16 [REP2-034], as amended. Should any changes be made to the assessment, this may also have implications for the reporting in Table 14.25.</b></p>
<a href="#">REP2-036</a>	6.2.3 Environmental Statement Volume 2, Chapter 7: Biodiversity (Tracked) (Rev 3)	This document has been updated at Deadline 2 in response to further engagement with the Environment Agency, where a request was made to include an assessment that considers potential impacts from the clear span bridge crossing of the existing Claydon Brook watercourse and outfall locations upon aquatic ecological receptors and propose mitigation as appropriate. The document references have not been updated from the

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		original submission. Please refer to the Guide to the Application [EN010158/APP/1.2.7] for the list of current versions of documents. <b>BC has no comment on these specific changes.</b>
<a href="#">REP2-043</a>	6.4.2 Environmental Statement Volume 4, Appendix 5.7: Indicative Construction, Operation and Decommissioning Waste (Tracked) (Rev 2)	The Council welcome the updates. On the stone waste, the Council requests that a comment be included 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 issue is resolved the Council will consider this matter closed.
<a href="#">REP2-045</a>	6.4.2 Environmental Statement Volume 4, Appendix 7.13: Arboricultural Impact Assessment (Tracked) (Rev 2)	<p>The Deadline 2 revisions to the AIA are noted and are helpful in improving transparency, including the clearer presentation of highway/access-related impacts and the updated Annex E plans. The revised assessment now presents a broader picture of retained features with potential above- or below-ground impacts, identifying 76 individual trees, 17 groups of trees and parts of 4 hedgerows, compared with 43 trees and 13 groups previously.</p> <p>The Council also notes paragraph 4.2.1 regarding G98 (possibly a Native Black Poplar group). In light of paragraph 5.2.8 which states G98 will remain unaffected by works and will be fenced beyond its projected RPA, it would be helpful for this feature to remain clearly identified and safeguarded through the detailed design and protection process.</p> <p>The Council considers that this fuller picture is broadly consistent with its earlier concern that the extent of interaction with retained arboricultural features was likely to be greater than previously presented. However, the Council remains concerned that the updated Annex E plans show areas of potential RPA impact in locations where tree protection fencing is also indicated.</p>

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		 <p>The image contains two diagrams of tree protection plans. The top diagram shows a green line representing a path or road, with several trees marked by circles and labels like 'T1', 'T2', 'T3', 'T4', 'T5', 'T6', 'T7', 'T8', 'T9', 'T10', 'T11', 'T12', 'T13', 'T14', 'T15', 'T16', 'T17', 'T18', 'T19', 'T20', 'T21', 'T22', 'T23', 'T24', 'T25', 'T26', 'T27', 'T28', 'T29', 'T30', 'T31', 'T32', 'T33', 'T34', 'T35', 'T36', 'T37', 'T38', 'T39', 'T40', 'T41', 'T42', 'T43', 'T44', 'T45', 'T46', 'T47', 'T48', 'T49', 'T50'. Orange arrows point to specific areas where the path crosses tree protection zones. The bottom diagram shows a similar path with trees and orange arrows pointing to specific areas where the path crosses tree protection zones.</p> <p>If these plans are intended to operate as a preliminary tree protection plan, the Council would ordinarily expect the protective fencing strategy to demonstrate more clearly how potential conflicts with retained RPAs are to be avoided. As presented, this suggests that the protection strategy is not yet fully resolved and still depends materially on later detailed design and the AMS to avoid conflict. In that context, the continuing</p>


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		absence of an Outline AMS remains significant, as the Council is still being asked to rely on later-stage arboricultural method development to demonstrate how retained trees and RPAs will be protected in practice.
<a href="#">REP2-047</a>	6.4.2 Environmental Statement Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment (Tracked) (Rev 2)	<p>In Annex D, Detailed Setting Assessment, there is a change to the section on the contribution of setting to significance of St Mary’s Church (grade II*), East Claydon. It has been amended to mention that as well as being visible from the north east, it is also visible in views from the south east, as illustrated in Viewpoint 27 of ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3].</p> <p>Although Viewpoint 27 illustrates part to these views from the base of the valley close to the proposed development, the views from the south east are more extensive (see Viewpoint 28 and Viewpoint 30, the view further north along the same bridleway as Viewpoint 30, north of Hogshaw Hill Farm, on the approach drive to the farm on the edge of the hill, provides a more dramatic view of St Mary’s church, East Claydon and Botolph Claydon Conservation Area).</p>
<a href="#">REP2-049</a>	6.4.2 Environmental Statement Volume 4, Appendix 12.1: Agricultural Land Classification Report (Tracked) (Rev 2)	Buckinghamshire Council notes that the document has been updated to clarify the extent of unsurveyed areas.
<a href="#">REP2-051</a>	6.4.3 Environmental Statement Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement (Tracked) (Rev 3)	Buckinghamshire Council notes that the Applicant has inserted a clarifying statement in the main body of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement (Tracked) [REP2-052] confirming that the document has been updated at Deadline 2 in response to the Written Representations from Claydon's Solar Action Group (CSAG). The Applicant states that this CSAG material was considered helpful in providing additional context regarding the portion of the local population registered with a GP at the 3W Health practice, and that Annex A (Health Effects

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		<p>Report) has been updated accordingly to reflect this context and to provide a more explicit conclusion on the sensitivity of relevant sub populations (including older people and those with access/geographic factors) to change. In doing so, the Council notes that the Applicant is positioning the [REP2-051] changes as targeted (i.e. primarily relating to baseline context and sensitivity conclusions), rather than a wholesale revision of the assessment approach across the main body.</p> <p>The Applicant has introduced additional contextual baseline information drawn from the appendices to CSAG's Written Representation, specifically in relation to the portion of the population registered with the 3W Health practice. This material is characterised by the Applicant as anecdotal rather than "official National Statistics" and is presented as supplementary context to inform the assessment. The Council recognises that in principle it is consistent with good health assessment practice to consider stakeholder evidence where it helps to describe potential vulnerability and sensitivity characteristics, provided that the status and limitations of that evidence are clearly stated. The Applicant's explicit caveat that the GP registered information is not official national statistics is therefore appropriate. However, the Council considers that the Applicant should continue to ensure that such information is used proportionately, and that conclusions drawn from it remain robustly triangulated against recognised datasets and the wider ES evidence base, particularly where it is used to inform significance judgements.</p> <p>[REP2-051] adds more explicit narrative that the elderly may represent a more sensitive age profile locally, and that both young and elderly groups may be more sensitive to noise and air quality effects due to time spent at home, slower reaction times, and lower thresholds for certain environmental stressors. It further records CSAG's assertions regarding the local ageing demographic, chronic disease, mobility limitations, reliance</p>

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		<p>on local GP/community services, barriers to access, social isolation, dependency/disability, and higher prevalence of conditions including respiratory disease and multimorbidity. The Council welcomes the increased awareness that sensitivity is not uniform across the population and is experienced differently. However, the Council notes that the additions remain largely narrative and would benefit from clearer signposting as to how these sensitivity considerations are carried through to the assessment of specific pathways and to any targeted mitigation, where relevant.</p> <p>The updated [REP2-051] also introduces specific risk factor prevalence estimates anecdotally, which introduces practice based estimated prevalence information for ailments such as stroke/ TIA, hypertension/ coronary heart disease and respiratory conditions (e.g. asthma and COPD), again framed as contextual information for the GP-registered sub population. The Council recognises that including these prevalence estimates may provide useful contextual insight into potential sensitivity for certain pathways (e.g. air quality and respiratory conditions; noise and chronic conditions). However, emphasises that such estimates must remain explicitly caveated and should not be used to imply population wide prevalence without appropriate evidential support.</p> <p>Buckinghamshire Council has already provided comment on the Health Effects Report at Annex A of the Health and Wellbeing Summary Statement [REP1 056] for the Examining Authority's Written Questions [REP1-090] Q1.13.1. In this response, the Council acknowledged improvements in structure and audit trail but raised several substantive matters. The Council's position is that [REP2 051] only partially responds to one strand of concern (explicit discussion of sensitivity for certain sub populations). All other matters, raised at Deadline 2 [REP2-090] and [REP2-092] do not appear to have been addressed. The Council's position</p>

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		<p>on these matters is unchanged and BC wishes the Applicant to address them through a further iteration of the assessment reporting.</p>
<p><a href="#">REP2-052</a></p>	<p>6.4.3 Environmental Statement Volume 4, Appendix 10.6: LVIA Visualisations Claydon House (Rev 3)</p>	<p>Buckinghamshire Council welcomes the addition of this photomontage, it is noted that at the distances demonstrated in this image it is hard to distinguish the proposed planting.</p> <p>In relation to historic environment, the montages raise the question of impacts to long views of the church tower of All Saints Church in views from the higher ground to the south west and whether its character as a landmark, which forms part of the contribution of its setting to its significance, would be affected.</p>
<p><a href="#">REP2-070</a></p>	<p>7.7.3 Outline Soil Management Plan (Tracked) (Rev 3)</p>	<p>The outline soil management plan has been updated to include references to when a suitably trained person or soil scientist are required.</p> <p>However, the Applicant provides contradictory guidance on the resilience of soils to handling. The Applicant continues to class the soils as having medium resilience to handling based on field capacity days (derived from 1988 climate data) despite describing the soils as slowly permeable, seasonally waterlogged with soil wetness the main limitation to agriculture.</p> <p>According to the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings, the clay and heavy clay loam textures of the soils on site 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.</p>

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		Field capacity days can indicate the proportion of the year that the soils are at field capacity and susceptible to damage but not their resilience to damage when they are in a dry, friable state that is suitable for handling.
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<a href="#">REP2-072</a>	7.8.3 Outline Rights of Way and Access Strategy (RoWAS) (Tracked) (Rev 3)	<p>The RoWAS has been updated to include: 1) recorded minimum widths of 2m for diverted rights of way; and 2) a survey assessing opportunities to replace stiles for gates to improve access for all abilities. These updates are welcome and resolve the matters. Regarding the latter, at para 4.3.3, there is no need to be concerned about minimum widths at field/hedge boundaries as BS 5709 2018 only requires space in the hedge for a gate or 1.1m gap (footpath), depending on stock control.</p> <p>The Council has suggested two improved options for the layout of the footpath diversions north-west of Pond Farm, described in para 7.1.2 and between Fields B5 and B13. While the Applicant's proposal benefits east to west movements to avoid 200m of road walking, which is a benefit (pink route), the council's suggested routes (green) follow desire-lines that avoid right angle bends (and possibly being fenced off in future), which is considered more desirable.</p>

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		 <p data-bbox="1144 662 1892 694">green = created footpath and black = deleted footpath</p> <p data-bbox="1144 1173 1948 1204">Pink = created footpath and black = deleted footpath (ignore green).</p> <p data-bbox="1144 1228 1982 1292">Although both work to different degrees, the green paths more closely reflect the historic passage of walkers.</p>