Rosefield Solar Farm

Applicant's Response to Deadline 2 Submissions

EN010158/APP/8.18
Revision 01
Deadline 3
May 2026
Rosefield Energyfarm Limited

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

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1. Introduction

1.1. Purpose of the Report

1.1.1. This Report provides, as appropriate, the Applicant's responses to the submissions received at Deadline 2 in respect of the Proposed Development.

1.1.2. This document does not look to replicate the positions previously iterated by the Applicant, and so the Applicant has instead signposted towards the following documents, where relevant:

- **Response to Section 89 (3) Document [EN010158/APP/8.2] [AS-035]**;
- **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**;
- **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**;
- **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**;
- **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**; and
- **Applicant's Response to Other Deadline 1 Submissions [EN010158/APP/8.14] [REP2-088]**.

1.1.3. Where topics have previously been raised at Issue Specific Hearing 1 (held on 20-21 May 2026), a summary of the Applicant's position can be found in:

- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16]**.

1.1.4. Where topics have previously been raised at Open Floor Hearing 1 (held on 24 February 2026), a summary of the Applicant's positions can be found in:

- **Written Summary of Applicant's Oral Submissions at Open Floor Hearing 1 (OFH1) [EN010158/APP/8.6] [REP1-106]**.

1.1.5. Where topics have previously been raised at Compulsory Acquisition Hearing 1 (held on 25 February 2026), a summary of the Applicant's positions can be found in:

- **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**.

1.1.6. The Applicant wishes to note that **Buckinghamshire Council's Responses to Examining Authority's first written questions (ExQ1) [REP2-090]** has been accidentally omitted during the Applicant's triaging of the Deadline 2 submissions. The Applicant will provide a response to Buckinghamshire Council's submission by Deadline 4, with a view to submit this response sooner, if practicable.

1.2. Structure and Approach

1.2.1. This document is structured as follows:

- **Section 2** summarises the submissions made by Interested Parties at Deadline 2 and whether the Applicant is responding to the submissions, or otherwise, and the reason(s) in either case;
- **Section 3** provides the Applicant's responses, if applicable, to submitted Written Representations in turn;
- **Section 4** provides the Applicant's response in relation to **Buckinghamshire Council's Local Impact Report Addendum [REP2-092]**;
- **Section 5** provides the Applicant's responses, if applicable, to interested parties' responses to Examining Authority's First Written Questions (ExQ1);
- **Section 6** provides the Applicant's responses, if applicable, to those other Deadline 2 submissions made by interested parties.

1.2.2. Each table within this document provides a consolidated response to any interested party submissions that the Applicant consider require response, in accordance with the summary provided for in **Section 2** of this document.

2. Scope of this Report

2.1. Applicant's Position on Providing Responses

2.1.1. This Section expands on each of the 'other submission' documents identified in **Section 1.2** above by confirming whether or not this report provides a response to the submissions made by Interested Parties and, if not, the reason(s) why the Applicant is not responding.

2.1.2. In splitting the submissions into the sections below, the Applicant has been guided by the Examination Library and how the Examining Authority categorised each submission within that.

Party and Examination Reference	Responded to in this Document?	Reason
Section 3 - Written Representations		
Claydons Solar Action Group [REP2-103]	Yes	Submission of a Written Representation.
Robert James Turner [REP2-125]	Yes	Submission of a Written Representation.
Peter Dobson [REP2-134]	Yes	Submission of a Written Representation.
Section 4 - Buckinghamshire Council's Local Impact Report Addendum		
Buckinghamshire Council [REP2-092]	Yes	Response to new information, limited to new information raised beyond the **Buckinghamshire Council Local impact report [REP1-112]**.
Section 5 – Interested Party Responses to ExQ1		
Natural England [REP2-098]	Yes	The Applicant wishes to respond to points made in this submission.
Environment Agency [REP2-095]	Yes	The Applicant wishes to respond to points made in this submission.
Forestry Commission [REP2-096]	Yes	The Applicant wishes to respond to points made in this submission.
Philip Claridge on behalf of A.E.J. & F.J. Claridge [REP2-123]	Yes	The Applicant wishes to respond to points made in this submission.

Preston Farms and TCS Biosciences Ltd [REP2-107]	Yes	The Applicant wishes to respond to points made in this submission.
Miles Roberts [REP2-122]	Yes	The Applicant wishes to respond to points made in this submission.
Waddesdon Surgery [REP2-109]	Yes	The Applicant wishes to respond to points made in this submission.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) [REP2-101]	Yes	The Applicant wishes to respond to points made in this submission.
Claydons Solar Action Group [REP2-102]	Yes	The Applicant wishes to respond to points made in this submission.
Hogshaw Farm & Wildlife Park [REP2-104]	Yes	The Applicant wishes to respond to points made in this submission.
East Claydon Parish Council [REP2-094]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP2-091]	No	The Applicant does not consider there to be any points made that require a response.
National Highways [REP2-097]	No	The Applicant notes there is a single request of the Applicant which is to update the draft Development Consent Order (DCO). The Applicant confirms this update has been made into Deadline 3.
National Trust [REP2-106]	No	The Applicant does not consider there to be any points made that require a response.
National Grid Electricity Transmission [REP2-105]	No	The Applicant does not consider there to be any points made that require a response. The Applicant will continue to work with National Grid Electricity Transmission on the Protective Provisions.
Statkraft UK Limited [REP2-108]	No	The Applicant does not consider there to be any points made that require a response.

Anglian Water Services Ltd [REP2-100]	No	The Applicant does not consider there to be any points made that require a response. The Applicant will continue to engage with Anglian Water Services Ltd throughout the examination.
Section 6 – Other Deadline 2 Submissions		
Buckinghamshire Council [REP2-089]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP2-093]	No	The Applicant does not consider there to be any points made that require a response.
Christine Mitchell [REP2-131]	Yes	The Applicant wishes to respond to points made in this submission.
UK Health Security Agency [REP2-099]	No	The Applicant does not consider there to be any points made that require a response.
Ian Smith [REP2-133]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Gary David Mathis [REP2-132]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Valerie Bond [REP2-130]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Thomas Aidan Morrison [REP2-129]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Susan Cooper Evans [REP2-128]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Samuel William Field [REP2-127]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.

Sally Tyler [REP2-126]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Robert James Ingham Clark [REP2-124]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Miles Roberts [REP2-121]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Mark Scholes [REP2-120]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Katherine Edgar [REP2-119]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Karen Jackman [REP2-118]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Julie Coad [REP2-117]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Julia Taylor [REP2-116]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Jenny Tilden-Walker [REP2-115]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
James Preston [REP2-114]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Gareth Williams [REP2-113]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.

Christopher Utley [REP2-112]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Christopher Graham [REP2-111]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.
Andrew Taylor [REP2-110]	No	The Applicant does not consider there to be any points made that require a response, though the Applicant notes the suggestions made by the Interested Party and considered these when finalising the ASI.

2.1.3. **Section 6** of this document captures a number of comments made by Interested Parties with regard for the **Applicant's Draft Itinerary for the Accompanied Site Inspection (ASI) [EN010158/APP/8.10] [REP1-110]**. In the **Applicant's Draft Itinerary for the ASI [EN010158/APP/8.10] [REP1-110]**, the Applicant sought to provide representative viewpoints from around the Order Limits which included views from residential properties.

2.1.4. In finalising the ASI itinerary, the Examining Authority will have had regard to representations made by Interested Parties at Deadlines 1 and 2 on the **Applicant's Draft Itinerary for the ASI [EN010158/APP/8.10] [REP1-110]** which includes considering requests for any further locations.

3. Responses to Written Representations

Table 3.1: Claydons Solar Action Group [REP2-103]

Ref.	WR Page Reference	Summary Position	Applicant's Response
3.1.1	2, para.6	Comment suggesting that there are no standards and regulations concerning the safety standards of large BESS installations in place and granting consent in those circumstances would be "irresponsible". The comment further questions whether the Applicant has insurance in place to cover a BESS failure	Paragraph 3.2.2 of the **Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.4]** outlines how the Applicant will develop the BESS in line with all relevant legislation and good practice in force at the time. A list of good practice documentation that will be used is listed. Details regarding the Procurement and Testing procedures and checks are also outlined to detail the robust quality process that the Applicant will undertake prior to selecting and procuring the final BESS. The system selected will be tested in accordance with UL 1973, UL 9540, UL 9540A, IEC 62619 and UN 38 or equivalent. This would determine the propensity of the system to suffer from thermal runaway at either cell, module or rack level. Section 5 of the **Outline BSMP [EN010158/APP/7.9.4]** documents the BESS safety commitments that will be adopted to ensure that the risks of a BESS failure event are minimised. The **Outline BSMP [EN010158/APP/7.9.4]** integrates the latest BESS safety requirements contained in NFPA 855 (2026) and NFCC Guidance ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. This is stipulated in the **Outline BSMP [EN010158/APP/7.9.4]** pre-construction requirements (see Section 7). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. NFPA 855 (2026): Standard for the Installation of Stationary Energy Storage Systems is the primary globally accepted BESS safety standard and is heavily referenced in NFCC guidance which are obviously valid and approved in the UK. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 7 of the **Outline BSMP [EN010158/APP/7.9.4]**.
3.1.2	2, para. 8	Comment noting that the BESS' energy capacity in MWh should be disclosed as the total stored energy determines the scale and risk profile of the installation and whether Hazardous Substances Consent (HSC) is required. Further comment noting that each 4MWh BESS container contains several tonnes flammable liquid electrolyte in addition to the electrical energy and that, unless an HSC is applied for and granted, it would appear that an offence under s. 23 of the	Please see **Ref. 5.9.8**. The Applicant notes this comment and confirms that the **Statement of Need [EN010158/APP/5.6] [APP-036]** recognises the intrinsic difference between the power capacity of a BESS, in MW, and its energy storage capacity (in MWh). The exact configuration of the Proposed Development's BESS (both in MW and MWh) depends on the requirements of the co-located scheme of which it is an associated development. However, the BESS design would be compliant with the control parameters set as part of the DCO. The final BESS configuration would be confirmed at detailed design once the prevailing requirements are confirmed.

Ref.	WR Page Reference	Summary Position	Applicant's Response
		Planning (Hazardous Substances) Act 1990 has occurred. Further comment that an HSC must be sought before batteries are transported to Site, not post consent.	BESS designs are evolving and technology is advancing. As they do, energy density (MWh energy storage capacity per BESS Container) is increasing. Further, the **Outline BSMP [EN010158/APP/7.9.4]** explains that NFCC guidance in place at the time of detailed design, with amendments (where permitted under the NFCC guidance) to align with other guidance such as NFPA 855, would be followed for design parameters such as spacing (See Section 5.5) and therefore may also impact the MWh capacity of the Proposed Development at a future time. Therefore, the energy storage capacity of the BESS (which is measured in MWh) is not a reasonable control parameter for the design of the BESS component of the Proposed Development. The Applicant therefore confirms that its indicative design for the BESS: • Will have a power capacity no larger than the import/export capacity of the grid connection agreement (expected to be 335MW), and • Will not exceed the maximum parameters committed to within the DCO through the **Design Commitments [EN010158/APP/5.9.5]** document. The Applicant confirmed at Issue Specific Hearing 1 on 20 May 2026 that the Applicant's indicative BESS energy storage capacity based on the concept design is currently approximately 1GWh. This value is subject to change either up or down depending on available technology at the point of detailed design. As identified in the **Schedule of Negotiations and Powers Sought [EN010158/APP/4.4.2] [AS-016]**, the Applicant is aware that an HSC under The Planning (Hazardous Substations) Act 1990 and accompanying Planning (Hazardous Substances) Regulations 2015 is likely to be required. Given the current status of the Application and the Proposed Development, there is no basis on which an offence under section 23 of the Planning (Hazardous Substations) Act 1990 can be said to have occurred. The Applicant will comply with the provisions of the legislation and if required under the legislation, would apply to Buckinghamshire Council as the consenting authority for HSC following detailed design. The Applicant notes that it would not be progressing detailed design until post-consent. The Applicant is not aware of any barriers to consent being granted if an HSC is required. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** recognises that the construction phase is anticipated to occur over a 30-month period. Subject to being granted consent, the earliest the Proposed Development's construction phase is anticipated to commence is mid to late 2029. This construction phase would include the transportation of the BESS units and would occur post-consent of the DCO. As referred to above, the Applicant will seek all other permissions to construct the Proposed Development.
3.1.3	2, para. 9	Comment noting the proximity of the Proposed Development to Preston Farms/TCS Biosciences and that this presents a serious risk to a nationally important medical supply chain, as noxious fumes and contaminated firewater from a potential fire could pollute surrounding farmland, compromise serum production, and require stringent containment and disposal measures in an environmentally sensitive area.	The Applicant has addressed this point in a previous submission in **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086].** Table 13-1, Ref 13.1.1 concludes that the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** results pose no significant risk to human receptors at Preston Farms or TCS Biosciences land holdings and no evidence has been presented to suggest these levels would pose a significant risk to horses. Please also see the response to **Ref. 5.5.9** which discusses the modelling that has been carried out to date and an additional design commitment to ensure that Hydrogen fluoride Levels within sensitive fields are below AEGL1 limit. The UKHSA is a Statutory Consultee for the Proposed Development and has advised within **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** that the Applicant's BESS fire emission risk analysis and consequence modelling *"provides a logical approach and assesses*

Ref.	WR Page Reference	Summary Position	Applicant's Response
			a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low." Section 6.6 of the **Outline BSMP [EN010158/APP/7.9.4]** provides examples of firefighting water runoff pollution mitigation features which will ensure the BESS drainage system will be designed to isolate and contain such flows to prevent pollution of the surrounding environment. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. This is stipulated in the **Outline BSMP [EN010158/APP/7.9.4]** pre-construction requirements (see Section 7).
3.1.4	3, para. 11	Comment noting that without a clear regulatory pause or binding controls, applicants (such as the Applicant) retain unchecked discretion to select battery technologies and storage capacities of their choosing, with no obligation to adopt safer emerging technologies even if they become available.	As outlined in the **Outline BSMP [EN010158/APP/7.9.4]**, "*As a minimum, the battery system will have completed unit or installation level UL 9540A (5th Edition) testing (Ref), the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026 revision) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc".* Please refer to paragraph 3.2.2 of the **Outline BSMP [EN010158/APP/7.9.4]**, which outlines how the Applicant will develop the BESS in line with all relevant legislation and good practice in force at the time. A list of good practice documentation that will be used is listed in the **Outline BSMP [EN010158/APP/7.9.4]**. Details regarding the Procurement and Testing procedures and checks are also outlined to detail the robust quality process that the Applicant will undertake prior to selecting and procuring the final BESS. Implementation of the measures outlined in the **Outline BSMP [EN010158/APP/7.9.4]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [EN010158/APP/3.1.5]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **Outline BSMP [EN010158/APP/7.9.4]**. The **Draft DCO [EN010158/APP/3.1.5]** also requires the relevant planning authority to consult with Buckinghamshire and Milton Keynes Fire Authority and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
3.1.5	4, conclusion	Comment noting that risk assessments for BESS should explicitly consider particulate emissions, with dispersion modelling based on full-scale fire test data and particular emphasis on sub-micrometre particles	The Applicant has undertaken a detailed Plume Assessment including Atmospheric Dispersion Modelling – refer to the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**. The report presents the findings of the impact assessment from the emissions of particulate matter (PM10 and PM2.5). The results presented in the report demonstrate that all impacts during a BESS incident are below the Air Quality Standards Levels (AQSs) at all nearby residential and Public Right of Way (PRoW)

Ref.	WR Page Reference	Summary Position	Applicant's Response
		due to their heightened risks to human health and the environment.	receptors. Furthermore, predicted environmental concentrations are also below the AQSs and impacts are considered negligible with respect to IAQMs criteria (see Table 4.6). Therefore, the impacts are not significant. To provide further assurance, paragraph 7.1.12 of the **Outline BSMP [EN010158/APP/7.9.4]** stipulates that at the detailed design stage**:** *"As recommended in NFCC guidelines a detailed BESS system and site-specific Plume Analysis and Atmospheric Dispersion will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius using the Rosefield confirmed BESS system supplier data. When the battery system of a BESS is fully consumed (burnt out), toxic gas, particulate matter and other relevant products of combustion emissions with the potential to impact sensitive receptors will be assessed against relevant public health/toxicological guideline values, such as UK Air Quality Objectives, WHO Air Quality Guidelines, or AEGLs. The plume study will also include a visibility impact assessment on any transport links within a 1 km radius of the BESS area."* The Applicant confirms that BESS Fire Emissions Modelling of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable of capturing every type of battery gas & particle emitted during the thermal runaway process at battery module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions and Particulate Matter can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing.
3.1.6	5 to 20 Article on the Characterization of Lithium-Ion Battery Fire Emissions—Part 2: Particle Size Distributions and Emission Factors	This submission reflects an academic article written by Claassen, M., et al. The article discusses how lithium-ion battery thermal runaways can release large quantities of ultrafine and sub-micron particles, containing hazardous constituents including fluoride and organic carbon, together with high emission rates of hydrogen fluoride (up to tens of mg/Wh), where the latter poses the most immediate danger to human health.	With regards to this article, the Applicant has undertaken a detailed Plume Assessment including Atmospheric Dispersion Modelling, please refer to **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**. The report presents the findings of the impact assessment from the emissions of Carbon Monoxide, Hydrogen Chloride, Hydrogen Fluoride, Hydrogen Cyanide, Nitrogen Dioxide, Butadiene, Benzene and particulate matter (PM10 and PM2.5). The results of this assessment predict no exceedances of any AEGLs and AQS at any receptor because of a BESS incident. When considering that a BESS incident is understood to be an extremely low probability event and the potential for effects that create notable discomfort (i.e. at AEGL 1 level) are not predicted even when using a conservative methodology, the risk of significant health effects to the surrounding receptors is judged to be very low. The UKHSA is a Statutory Consultee for the Proposed Development and has advised within the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** that the Applicant's BESS fire emission risk analysis and consequence modelling *"provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment*

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			suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low."
3.1.7	20 to 30 Journal on the Characterization of Particulate Emissions from Thermal Runaway of Lithium-Ion Cells	This submission reflects an academic journal written by Premnath, V. et al. The journal describes that although lithium-ion batteries are central to modern energy and storage systems, their inherent risk of thermal runaway (triggered by electrical, mechanical or thermal abuse and leading to exothermic reactions, fires and potential explosions of flammable gases) represents a well-recognised and serious safety concern.	Section 5 of the **Outline BSMP [EN010158/APP/7.9.4]** documents the BESS safety commitments that will be adopted to ensure that the risks of a BESS failure event are minimised. The **Outline BSMP [EN010158/APP/7.9.4]** integrates the latest BESS safety requirements contained in NFPA 855 (2026) and NFCC Guidance ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Please refer to **Ref. 3.1.5** and the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** which explain that, even when using a conservative methodology, the risk of significant health effects to the surrounding receptors is judged to be very low.
3.1.8	31 to 41 Scientific report on Coastal wetland deposition of cathode metals from the world's largest lithium-ion battery fire	This submission reflects a scientific report written by Aiello, I.W., et al. The scientific report explains that rapid, high-resolution soil surveys undertaken after the Moss Landing BESS fire in California detected a significant but transient, shallow (<5 mm) surface enrichment of Ni, Mn and Co in adjacent estuarine wetlands. Furthermore, the report highlights that spatially intensive, adaptive post-incident monitoring is needed to detect and track metal mobilisation risks that standard sampling may miss.	The Moss Landing fire involved legacy systems that were not compliant with NFPA 855 and integrated NMC pouch cell, air-cooled battery systems that will not be considered for the Proposed Development. It is not credible to consider that the range and impact of a smoke plume generated from more than 55,000 battery modules (which also burnt through a significant portion of a power station roof) is in any way comparable to the impacts of a smoke plume generated from a fire within a single non-combustible current BESS design typically containing 40-60 battery modules. The **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** presents the findings of the impact assessment from the emissions of particulate matter (PM10 and PM2.5). The study followed NFCC guidelines, meaning that Plume Analysis and Atmospheric Dispersion modelling was conducted to assess the environmental impact of a site incident to sensitive receptors within a 1km radius of the Proposed Development BESS area; significant gas and particle emission impacts will not extend beyond this radius. The results presented in the report demonstrate that all impacts during a BESS incident are below the Air Quality Standards Levels (AQSs) at all nearby residential and PRoW receptors. Furthermore, predicted environmental concentrations are also below the AQSs and impacts are considered negligible with respect to IAQMs criteria (see Table 4.6). The Applicant confirms that BESS Fire Emissions Modelling of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable of capturing every type of battery gas & particle emitted during the thermal runaway process at battery module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO_2), Hydrogen (H_2), Sulphur Dioxide (SO_2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions and Particulate Matter can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing.

Table 3.2: Robert James Turner [REP2-125]

Ref.	WR Page Reference	Summary Position	Applicant's Response
3.2.1	1	Comment noting the extreme depletion of habitat connectivity in an area of outstanding diversity, to the detriment of a wide range of endangered species. Further comment noting distraction of important, nesting, overwintering and foraging areas. Further comment noting unrealistic BNG criteria for solar farms.	The Applicant disagrees that the Proposed Development would result in the depletion of habitat connectivity in the area to the detriment of a wide range of endangered species. The mitigation approach outlined in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** and secured via the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3] [REP2-067]** has been designed to retain key habitat features such as woodland whist maintaining connectivity and ensuring species have access to nesting, forging and overwintering habitat. In relation to BNG, **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** has been carried out in line with national and local policy and is consistent with BNG assessments carried out for similar large-scale solar schemes and the Applicant has been pragmatic with regards its BNG assumptions. Overall, the Proposed Development is committing to deliver a 40% net gain in area habitat Biodiversity Units (BUs), a 17% net gain in hedgerow BUs and a 10% net gain in watercourse units.
3.2.2	1	Comment noting possible overwhelming damage to present and future opportunities for the local economy especially through tourism, as a result of the Proposed Development.	The Applicant has undertaken an assessment on tourism in accordance with EN-1 within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] [REP2-033]**. Effects on the tourist economy are assessed to be limited in significance and spatial and temporal scope – there are only two receptors likely to experience significant residual adverse effects, and these effects are related only to landscape and visual impacts (air quality, noise, traffic and access and cultural heritage are not significantly affected in terms of the tourist economy).

Table 3.3: Peter Dobson [REP2-134]

Ref.	WR Page Reference	Summary Position	Applicant's Response
3.3.1	1, para. 1	Comment noting that the BESS should be specified in terms of two units: x MW/ y MWh. Only the former units appear to be used and it is the second which is very important because it determines the number and size of the "containers" and the usefulness of the facility.	The candidate BESS design must not exceed the maximum parameters committed to within the DCO through the **Design Commitments [EN010158/APP/5.9.5]**. The footprint of the BESS Compound will be no greater than 105,000m^2 and the height no greater than 6m Above Ground Level (AGL). The BESS units themselves are no greater than 4.5m AGL. BESS designs are evolving and technology is advancing. As they do, energy density (MWh energy storage capacity per BESS Container) is increasing. Further, the **Outline BSMP [EN010158/APP/7.9.4]** explains that NFCC guidance in place at the time of detailed design, with any amendments (where permitted under the NFCC guidance) required to align with other guidance such as NFPA 855, would be followed for design parameters such as spacing (See Section 5.5) and therefore may also impact the MWh capacity of the Scheme at a future time. For this reason, MWh is not a reasonable control parameter for the design of the BESS component of the Proposed Development. The Applicant can confirm that, as set out in the **Grid Connection Statement [EN010158/APP/7.1] [APP-137]**, the Applicant has been notified that it will receive a Gate 2 Phase 2 grid connection agreement with NESO which the Applicant has requested to be reduced to 335MW (AC). This request extends also to both the export and import part of the Gate 1 grid connection agreement the Applicant has been notified it will receive for the BESS. The Applicant's **Statement of Need [EN010158/APP/5.6] [APP-036]** explains at Paragraph 6.11.34 that: *"Alongside the export capacity secured through a scheme's grid connection agreement, the size of the import connection secured by connection agreement with NESO at the point of connection is also an important input into the maximum power capacity of the BESS proposed at a facility. Other physical parameters may limit specific elements of the scheme, including parameters which will have the effect of capping the energy capacity of the proposed BESS"* The Applicant therefore confirms that its indicative design for the BESS: • Will have a power capacity which after accounting for electrical losses would be no larger than the import/export capacity of the grid connection agreement (expected to be 335MW), and • Will not exceed the maximum parameters committed to within the DCO through the **Design Commitments [EN010158/APP/5.9.5]** document. Section 7.9 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** describes the potential contributions made by a storage asset as part of the Proposed Development to the GB electricity market. This includes the role of the storage asset in supporting the operation of the solar asset by directing energy from times when generation is in abundance to times when it is needed. The storage asset would also be able to provide ancillary services which support the operation of the solar asset as part of a decarbonised GB electricity system and help to mitigate the impact arising from an increasing portion of the UK's electricity being supplied from intermittent renewable sources. Further explanation of the associated nature of the storage development is included in the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**.

Ref.	WR Page Reference	Summary Position	Applicant's Response
3.3.2	1, para. 2	Comment that the access for fire services to the BESS should be clearly defined and the spacing between containers defined in terms of UK Standards and Regulations. Further comment that there is an unfortunate tendency for applicants to use American standards and it is not clear if these are valid or approved by UK Govt.	The Applicant has designed the BESS in line with industry best practice, applicable guidance and ongoing dialogue with stakeholders such as the UKHSA and Buckinghamshire and Milton Keynes Fire Authority. This includes the layout of the assets to limit the ability for a thermal runaway event to spread to adjacent enclosures, as well as suitable preventative measures and response to any thermal runaway event. For example, as per NFCC guidance, two independent access points have been included in the design of the Proposed Development (see **Illustrative Layout Plans and Sections [EN010158/APP/2.6.3]** [**REP1-007**]) to ensure safe access and egress for any emergency services that may need to respond to an event. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. This is stipulated in the **Outline BSMP [EN010158/APP/7.9.4]** Pre-construction Requirements (Section 7). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. NFPA 855: Standard for the Installation of Stationary Energy Storage Systems is the primary globally accepted BESS safety standard and is heavily referenced in NFCC guidance which are obviously valid and approved in the UK. Paragraph 5.2.2 of the **Outline BSMP [EN010158/APP/7.9.4]** stipulates "*Final BESS design and site layout will be validated through mandatory Large Scale Fire Testing (LSFT) and rigorous site-specific consequence modelling to minimise the requirement for BFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or other infrastructure equipment*." The Applicant also investigated BESS safety – including fire risk – and adopted suitable mitigation measures that are secured within the **Outline BSMP [EN010158/APP/7.9.4]** and **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**. These documents set out the very low likelihood of such an event, the worst-case impacts that could occur and confirms that in such an event, this would not pose significant risks to nearby human health receptors. In the detailed design stage, the Applicant would mutually agree an Emergency Response Plan with Buckinghamshire Fire and Rescue Services, setting out how they would respond to any BESS event.
3.3.3	1, para. 3	Comment noting that each 4 MWh BESS container contains several tonnes of flammable electrolyte, creating significant potential liability in the event of fire, and that the planning authority should therefore require clarity on who bears insurance responsibility and the level of liability coverage proposed for risks to life, property and the environment.	The Applicant's Third Party Liability policy (TPL) ensures that a robust indemnity is available for any damage caused to third party property or injury to persons arising out of the BESS component of the Proposed Development. Escape of environmental pollutants from the BESS (and the cleanup required) would also be covered by the TPL policy. The Applicant would also insure the Works/assets against damage arising during the construction and operation phases. This means that remedial works to correct any damaged portion of any property are suitably funded and can be carried out with all dispatch, minimising any periods when visible damage to property exists.

4. Buckinghamshire Council's Local Impact Report Addendum

Table 4.1: Buckinghamshire Council [REP2-092]

Ref.	Page Reference	Summary Position	Applicant's Response
4.1.1	3, para. 1.1.1	Tracked amends are made to the previously submitted Local Impact Report and these serve to change the tense of the Local Impact Report and note that Buckinghamshire Council submit their interpretation of the content of the Applicant's Health Effects Report.	The Applicant notes this comment and the wider intent of Buckinghamshire Council to provide response to the Health Effects Report which is provided for as an annex to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**.
4.1.2	6, para. 1.1.17	Comment noting that the addition of the Health Effects Report provided for as an annex to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement (which was submitted at Deadline 1) represents a clear improvement over earlier submissions by consolidating health-related conclusions, identifying relevant health determinants and pathways, and providing a clearer audit trail for significance judgements, thereby partially addressing concerns previously raised by Buckinghamshire Council and the ExA.	The Applicant notes this comment and welcomes the acknowledgement that the revised document **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** partially addresses Buckinghamshire Council's concerns. This will be reflected in an update to the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.3]** which has been submitted at Deadline 3. The Applicant will continue to engage directly with Buckinghamshire Council to address remaining concerns where possible.
4.1.3	6 and 7, para. 1.1.18	**Application of Guidance** Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not demonstrably apply IEMA/ISEP social impact assessment methodology.	The Applicant notes that the ISEP Guidance "Social Impact Assessment in EIA" was published in October 2025, after the DCO Application for the Proposed Development was submitted in September 2025 and therefore was not used as the basis for the population and health assessments undertaken at the point of application. As **Annex A: Health Effects Report** is effectively an extension of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**, the guidance was considered in this update when submitted at Deadline 1. It is the Applicant's position that the assessment provided is in accordance with this guidance, noting that principally in terms of health effects the guidance points to the preceding ISEP guidance use for the production of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** (including **Annex A: Health Effects Report**) (*Effective Scoping of Human Health in Environmental Impact Assessment (2022)*; and *Determining Significance for Human Health in Environmental Impact Assessment (2022)).* The ISEP Guidance "Social Impact Assessment in EIA" additionally refers to national wellbeing frameworks such as the Sustainable Wellbeing Framework, which accords with the approach taken in **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** (including **Annex A: Health Effects Report**) to the definition of the wider determinants of health (Table 1). Notwithstanding this, the Applicant is content that the approach to population and health assessment is broadly in accordance with the Guidance, but more importantly (as this is only guidance) is in

Ref.	Page Reference	Summary Position	Applicant's Response
			accordance with the requirements of legislation (the EIA Regulations), policy (NPS EN-1) and the approach agreed through the scoping process.
4.1.4	6 and 7, para. 1.1.18 7, para. 1.1.19	**Non-Technical Summary** Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not afford health impacts equivalent prominence within the Environmental Statement. Comment noting that Buckinghamshire Council considers the Non-Technical Summary has not been updated to reflect the revised health assessment material, and should therefore be amended to clearly summarise health and wellbeing conclusions, including the significance of effects, to ensure consistent ES-wide reporting.	The Applicant considers that as an Appendix to the ES, the Health and Wellbeing Summary Statement and the Health Effects Report (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4])** are both certified documents that have according weight alongside other elements of the Environmental Statement including the 'stand alone' chapters. The approach taken is in accordance with **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4]** [APP-079] and **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** [APP-080]. The Planning Inspectorate agreed that human health could be scoped out of the ES (**ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4]** [APP-080]**, p18**) on the basis that the ES should still clearly set out potential impacts to human health from the Proposed Development and cross-reference where impacts are considered and assessed within other relevant chapters of the ES, with any relevant mitigation measures secured within the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.4]**. Consideration of health impacts is incorporated into e.g.: air quality, landscape & visual, noise & vibration, population, traffic & transport, land & groundwater, water and glint & glare topic chapters and assessments as appropriate, as well as **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. The Applicant has considered whether it is beneficial to include a short statement in individual sections of the NTS (or a new stand-alone chapter of the NTS) but is generally of the view that the purpose of the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** is to address the health implications of the assessments considered by the ES chapters, which have not changed. The individual NTS chapters for each topic therefore remain as produced to date.
4.1.5	6 and 7, para. 1.1.18 8, para. 1.1.21 and 1.1.22	**Geographically-defined High-Exposure Sub-Populations** Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not consistently identify and assess vulnerable high-exposure sub-populations as distinct receptors. Specifically, the assessment does not provide sufficiently focused assessment for higher-exposure, more sensitive geographic sub-populations have been adequately assessed as distinct receptors, and therefore does not support the Applicant's conclusions, instead requiring further avoidance, targeted mitigation and additional assessment to reduce significant residual effects.	The approach taken in **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** is compliant with the IEMA (now ISEP) guidance on developing assessments for health and wellbeing effects. This includes a proportionate approach to identifying and considering the sensitivity of geographically defined higher exposure sub populations in the context of population scale effects on public health. It is acknowledged that those living closer to the source of environmental change related to the Proposed Development, and the location of effects, including changes to the visual amenity of PRoW and wider landscape change will experience more acutely the effects of the Proposed Development, as a result of their higher propensity to regularly experience a different visual environment in their homes and on affected PRoW which are more readily accessible than others (and alternatives that are not affected). While it would be disproportionate to identify specific individual homes and people by geography, it is also acknowledged that some people in the area are likely to be more sensitive/vulnerable to change as a result of their demographic and health characteristics, as described within the Health Effects Report. This may be related to age, disability, reported health or underlying health conditions (which in many cases may be related to age or disability).

Ref.	Page Reference	Summary Position	Applicant's Response

The Applicant has developed mitigation measures to address the 'worst case' scenario of effects, and applied thresholds and standards (for example in terms of noise effects) to reduce effects to a less than significant level where practicable, and this inherently includes a consideration of the potential for increased sensitivity to change. Mitigation is also flexible and provided in outline at the point of DCO Application, and is subject to detailed development which can include receptor-specific and geographically-specific measures and monitoring/remedial measures.

In terms of specific receptors identified:

a. **Preston Farms/TCS Biosciences** – As set out within **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** – specifically **Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farms** – bespoke and responsive mitigation that will be flexible based on business requirements at the time has been developed through engagement with the receptor to acknowledge the individual characteristics and sensitivities of the operation, including bespoke approaches to management of noise, traffic, biosecurity and access for grazing animals. This mitigation is secured within the **Outline CEMP [EN010158/APP/7.2.4]** and **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.4]**.

b. **Residential/Farm and discrete, localised 'community' receptors -** The effects being referred to by Buckinghamshire Council relate to **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** which concludes that *"only residents of dwellings at Bernwood Farm and Sion Hill Farm would experience significant visual effects during both years 1 and 10 of operation. The assessment concludes that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development"*.

   No other significant effects are reported for these individual receptors, and mitigation has been developed iteratively to reduce the potential for significant adverse effects through the application of the mitigation hierarchy and explained through the ES which evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** and **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]**.

   While residents in some locations may experience significant adverse landscape and visual effects, the Applicant stands by the conclusion in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development.

   Such effects are acknowledged to be individually experienced and subjective, which lends more weight to the lack of a possible conclusion on definitive health pathway effects.

As stated above and in response to ExA Q1.13.2 in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**, guidance sets out that the assessment of health effects on individual receptors is not proportionate.

Ref.	Page Reference	Summary Position	Applicant's Response
4.1.6	8, para. 1.1.22	**LVIA, PRoW and Cumulative Effects** Comment noting that Buckinghamshire Council remains unsatisfied that residual significant landscape-related effects, and cumulative wellbeing effects (reported in ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement) have been addressed.	The **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) clearly assesses the potential for determinants of health to arise from significant residual landscape and visual effects (at Section 7.3 of Annex A) and where intra-project and inter-project effects may result in result in cumulative wellbeing effects (Section 4 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) and Section 8 of the **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**). In terms of residual significant landscape effects: The significance of health-specific effects, based on the approach as set out through ISEP (formerly IEMA) Guidance, and including the delivery of mitigation, the significance of the effect of landscape and visual amenity as a determinant on health is considered to be (in the context of the application of mitigation and the approach to assessment of significance set out above) moderate adverse with the *potential* to be significant. However, this is subjective and geographically limited to locations and areas experiencing significant effects, is likely to affect sensitive sub-populations more acutely, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRoW), with some localised, significant but not overbearing effects on residential properties and their inhabitants. For clarity – the extent to which landscape and visual change, though significant and adverse, translates to health effects is subjective and geographically limited to locations and areas experiencing significant effects, is more likely to affect sensitive sub-populations, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRoW), with some localised, significant but not overbearing effects on residential properties and their inhabitants. The determinant of health effects is generally built on the pathways that include assigning an effect on personal perception of the landscape and its mental health and wellbeing value being dependent on subjective interpretation of the landscape as a whole, and of individual views by an individual and collective set of receptors – change to the landscape may cause some people to experience stress or anxiety, if they are unable to access other areas of landscape quality, or if a change to their experience of the landscape means they are less inclined to undertake physical activity within it. As such, a significant effect on health is unlikely to occur at a population scale, but has been considered *potentially* significant (paragraph 7.3.29) in some cases given the application of ISEP criteria and in the context of community feedback, as reported in **Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. The ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the **Design Approach Document [EN010158/APP/5.8.2]** **[REP1-018]** and **Outline LEMP [EN010158/APP/7.6.3]** **[REP2-067]**. As set out in previous submissions, following the implementation of embedded and additional mitigation, there are likely to be a mix of significant and non-significant effects on landscape and visual amenity, which are likely to translate into the potential for effects on physical and mental health and wellbeing, in some instances, and in the context that such pathways (i.e. people's interpretation of

Ref.	Page Reference	Summary Position	Applicant's Response
			changes to the environment, and how this may or may not affect health and wellbeing and to what degree) are often individual and subjective. The Applicant has applied proportionality and used the mitigation hierarchy to deliver appropriate mitigation where practicable for these effects – this starts with identifying the embedded mitigation in the form of planting and landscape strategy that would be required across the Site to minimise effects on receptors where practicable, and the application of additional mitigation (e.g. in the form of long-term maintenance of such embedded mitigation is required to ensure its effectiveness). Mitigation relied upon is described at paragraph 7.3.17 of the Health Effects Report (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) and refers to, for example, ensuring that all existing hedgerows, trees and woodland would be retained and protected during construction (where not indicated for removal) **– Outline CEMP [EN010158/APP/7.2.4]** – and ensuring that existing and new hedgerows (once established) will be maintained at a minimum height of 3.5m for the duration of the operation phase of the Proposed Development (**Outline LEMP [EN010158/APP/7.6.3] [REP2-067]**). <u>In terms of intra-project cumulative effects on wellbeing:</u> A detailed assessment of intra-project cumulative effects is reported in the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** – No combined inter-topic significant effects have been identified as a result of the intra-project combined effects assessment. <u>In terms of inter-project cumulative effects:</u> Paragraph 8.3.7 – "*In summary, likely significant effects are predicted during the operational (including maintenance) phase of the Proposed Development, and hence the Applicant considers that inter-project cumulative effects related to this determinant of health have the potential to be significant (in the context of the already significant effects related to the Proposed Development.*)" For clarity – the extent to which landscape and visual change, though significant and adverse, translates to health effects is subjective and geographically limited to locations and areas experiencing significant effects, is more likely to affect sensitive sub-populations, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRoW), with some localised, significant but not overbearing effects on residential properties and their inhabitants. The determinant of health effects is generally built on the pathways that include assigning an effect on personal perception of the landscape and its mental health and wellbeing value being dependent on subjective interpretation of the landscape as a whole, and of individual views by an individual and collective set of receptors – change to the landscape may cause some people to experience stress or anxiety, if they are unable to access other areas of landscape quality, or if a change to their experience of the landscape means they are less inclined to undertake physical activity within it. As such, a significant effect on health is unlikely to occur at a population scale, but has been considered *potentially* significant (paragraph 7.3.29) in some cases given the application of ISEP criteria and in the context of community feedback, as reported in **Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. The Applicant has taken proportionate and appropriate measures to address the potential for its contribution to these significant adverse cumulative effects through:

Ref.	Page Reference	Summary Position	Applicant's Response
			a) Design principles to limit impacts on individual residential properties and the landscape character of surrounding villages– for example through the **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018] and **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]; and b) Mitigation described at paragraph 7.3.17 of the Health Effects Report (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) which refers to, for example, ensuring that all existing hedgerows, trees and woodland would be retained and protected during construction (where not indicated for removal) **– Outline CEMP [EN010158/APP/7.2.4]** – and ensuring that existing and new hedgerows (once established) will be maintained at a minimum height of 3.5m for the duration of the operation phase of the Proposed Development (**Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]). Additionally, the Applicant has produced an I**nterrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes Report [EN010158/APP/8.15]** at Deadline 3 that builds on the assessment of cumulative effects and interrelationships presented in the ES by considering opportunities for interproject coordination to minimise cumulative effects and maximise delivery opportunities. As set out in **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**), and in accordance with ISEP guidance, the effective communication and engagement around effects, change and mitigation is important primary mitigation to potential effects on environmental change. To that end, the Commits the Applicant to consult with the Community Liaison Group (CLG) on relevant points of interest during the detailed design stage, prior to the submission and approval of the detailed design in accordance with Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. This could include, for example, the location and content of interpretation boards and waymarking signage and the options for planting alongside PRoW and permissive paths, as appropriate.
4.1.7	6 and 7, para. 1.1.18	**Mitigation and Enhancements** Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not adequately progress suggested mitigation capable of reducing significant residual effects (including suggestions made by Preston Farms/TCS Biosciences).	The only potential wider determinants of health likely to influence public health identified by the **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) relate to changes in landscape and visual amenity, which are localised, and subjective. The Applicant recognises that following the implementation of embedded and additional mitigation, there are likely to be a mix of significant and non-significant effects on landscape and visual amenity, which are likely to translate into the potential for effects on physical and mental health and wellbeing, in some instances, and in the context that such pathways are often individual and subjective. The Applicant has applied proportionality and used the mitigation hierarchy to deliver appropriate mitigation where practicable for these effects. As referenced by Buckinghamshire Council, the Applicant has included enhancements over and above that which is required for the specific mitigation of individual environmental effects. The Applicant's position on mitigation and effects identified by Preston Farms Ltd and TCS Biosciences Ltd has been set out within **Table 5.5** of this document.

Ref.	Page Reference	Summary Position	Applicant's Response
			The **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] and **Outline RoWAS [EN010158/APP/7.8.4]** secures important enhancement measures relevant to positive health pathways, including the provision of new permissive footpaths and increased accessibility, opportunities for recreation in the natural environment, and environmental improvements. The Applicant will provide a variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland open fields; scrub and margins with wildflower; the planting of hedgerows and tree belts; the establishment of ecological ponds (either former ponds for recreation or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds. Further detail of these benefits are captured and secured within the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]. The Proposed Development would deliver a Biodiversity Net Gain (BNG) in excess of 10%, as secured within the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067].

5. Responses to Interested Party Responses to ExQ1

Table 5.1: Natural England [REP2-098]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.1.1	2 (ExA Question 1.7.1 – **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that Natural England considers that, notwithstanding revisions to the updated outline LEMP, outline CEMP and new supporting documents, the Applicant has not addressed concerns regarding impacts on rare bat species, and that unless the Proposed Development's layout is amended to retain a large proportion of Fields B6, B7 and B8 (as they exist now), those ecological concerns will remain unresolved.	As detailed within **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] (see response to Ref 2.1.39), the Applicant is not intending to remove Solar PV development from these fields. The Applicant is aware that fields located between Sheephouse Wood SSSI and Shrubs Wood form important areas of the Bechstein's bat core sustenance zone and these woods will remain well-connected with strong linear features between them all, helping to reduce potential displacement effects from Solar PV modules to foraging and commuting bats and ensure the connectivity between these woodlands is maintained, secured via the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]. However, the extent to which these pasture areas in Fields B6, B7 and B8 are of greater value than other pasture areas, based on the quality of the habitat as well as their location, is questionable, with a full detailed response provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006]**, RR-203 page 209**. The Applicant is discussing and will continue to discuss this matter with Natural England, to seek an agreement on this matter.
5.1.2	2 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that while the construction noise assessment in the Bat Technical Study is largely welcomed, residual risks remain due to unknown plant noise characteristics and the proximity of potential bat roosts to haul routes, requiring updates to the outline CEMP, inclusion of noise considerations regarding specific plant to be used within the protected species plan, and targeted construction-phase noise monitoring to inform effective mitigation.	The Applicant welcomes Natural England's review of the construction noise assessment presented within **Bat Technical Study [EN010158/APP/8.5]** [REP1-105], and confirms that the worst-case scenario has been assumed within the **Bat Technical Study [EN010158/APP/8.5]** [REP1-105] regarding the level of noise generated by plant to be used during the construction phase. The plant actually used in the construction phase of the Proposed Development will likely generate less noise than the noise levels assumed in the assessment. Once the actual plant to be used is confirmed, the noise assessment currently within the **Bat Technical Study [EN010158/APP/8.5]** [REP1-105] (see **Table 1, page 5-9**) will be updated at detailed design stage, the **Outline CEMP [EN010158/APP/7.2.4]** has been updated at Deadline 3 to confirm this. This information will determine whether existing mitigation measures need to be refined or whether any additional mitigation requirements such as construction phase noise monitoring and a Precautionary Working Method Statement (PWMS) need to be included into the detailed Construction Environmental Management Plan for haul route construction (notably around trees that could support bat roosts), and the installation of Solar PV modules and other infrastructure. The **Outline CEMP [EN010158/APP/7.2.4]** has been updated at Deadline 3, to include proportionate noise considerations for confirmed and potential bat roosts that could be directly or indirectly affected during the construction phase and these will be reflected in the species protection plans (detailed within an secured by the **Outline CEMP**

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
			[EN010158/APP/7.2.4]) which will be produced alongside the detailed Construction Environmental Management Plan and detailed Landscape and Ecological Management Plan.
5.1.3	3 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting interest in the Bat Technical Study's reference to the noise study on the operative Burwell Solar Farm. Further comment stating that this study was not carried out with the express purpose of identifying avoidance behaviour displayed by bats and that the reason for bat avoidance behaviour remains unknown.	It is acknowledged that there is uncertainty around the extent of displacement of bats from solar farms and any potential mechanism that could cause such an effect, as set out in the Applicant's literature review (see **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] Appendix 2, pages 114-140**). However, the information set out in **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** (see **Table 2, page 10-12**) indicates that operational noise is unlikely to be the cause of such displacement.
5.1.4	3 and 4 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that while grazing under panels and cattle-grazed mitigation areas could in principle benefit bat foraging, this management approach is not yet secured as part of the Proposed Development. Further comment noting that although multiple studies show a positive relationship between cattle and bats, the relationship between bats and sheep specifically has not been investigated and that the attraction of insects to livestock is a complex topic that is likely affected by various factors that have not been considered and warrants further investigation but cannot be explored in any depth to inform the Proposed Development.	The **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** submitted at Deadline 1 presents a literature review that indicates there may be some benefits associated with sheep-grazing under solar PV modules contributing to an overall greater insect biomass for foraging bats but has not attempted to reach any conclusions other than this. The Applicant has not relied on this presented information and provided it to give background information. and the mitigation strategy is not reliant on grazing. The **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** sets out and secures the proposed approach to grazing and locations in Section 5.2 and within Appendix 4 which details the steps to managing each proposed habitat and is secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**).

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.1.5	5 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that, given the uncertainty around bat responses to solar infrastructure and the unknown value of sheep grazing within panel arrays, the recommended approach is to avoid development on existing cattle-grazed pasture between key ancient woodland blocks, retain and enhance these fields (particularly between Fields B6 to B8) as an avoidance and resilience measure for Bechstein's bats, while focussing solar development on arable land of lower ecological value.	As detailed within **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** (see response to Ref 2.1.39), the Applicant is not intending to remove Solar PV development from these fields. The Applicant has however increased the offsets from the fenceline to hedgerows in these fields from 10m to 15m in consultation with Natural England, with the additional 5m from security fence to Solar PV modules. This means that gaps between panels in these adjacent fields is 40m, i.e. 20m either side of these hedgerows. The setbacks were increased in recognition that fields located between Sheephouse Wood SSSI and Shrubs Wood form important areas of the Bechstein's bat core sustenance zone. However, the extent to which these pasture areas are of greater value than other pasture areas, based on the quality of the habitat as well as their location, is questionable, with a full detailed response provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], RR-203 page 209**. The Applicant is discussing and will continue to discuss this matter with Natural England, to seek an agreement on this matter.
5.1.6	5 and 6 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that the paired detector analysis in the Bat Technical Study is methodologically flawed, relying on insufficient data and inappropriate statistical tests that artificially inflate sample size, add no evidential weight, and cannot support conclusions about bat use of open habitats, a limitation the study itself ultimately acknowledges.	As acknowledged, the Applicant notes the limitations of the study within the **Bat Technical Study [EN010158/APP/8.5] [REP1-105}** however the results of the study do provide an indication that the approach to the mitigation that the Applicant has taken, i.e. ensuring connectivity across the Order Limits, and to the wider landscape, is the correct approach. The paired study was provided in response to Natural England's wish to investigate differences in relative bat activity between boundary features and open habitats. The limitations of such comparison via acoustic recordings are well recognised; not only because acoustic methods alone are insufficient to reliably quantify Bechstein's bat behaviour, but also because it is difficult to robustly sample activity across an open field (particularly when attempting to contrast this with activity in a constrained location such as a boundary feature). However, the high value of boundary features to all bats, and particularly 'clutter-feeding' bats that echolocate over short distances such as Bechstein's bat) are well-known. The mitigation strategy to address impacts on roosting, foraging and commuting bats is not affected by the robustness or otherwise of the paired detector study, for three reasons. Firstly, the amount of grassland habitat to be lost is to be replaced by twice as much grassland of higher quality that is distributed through the wider landscape within the Bechstein's bat home range; much of it closer to where the majority of maternity roosts are than at present. Secondly, connectivity to that retained and additional grassland is preserved by strengthening the network of hedgerows throughout, providing strong corridors. The width of those corridors between panels (on either side of a boundary) is considered adequate because it encompasses the echolocation range of short to medium-range echolocating bats.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
			Finally, almost the entirety of the roost resource will be retained (and in fact there is no confirmed roost loss at the current time).
5.1.7	7 and 8 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that although the updated outline LEMP clarifies buffer locations and adds detail on mitigation, Natural England considers that the Applicant's approach to buffer measurements are less precautionary than advised and this reduces certainty in assessing impacts. Comment that the buffers are probably sufficient to avoid impacts on bat commuting routes and connectivity if an appropriate monitoring strategy is put in place. Further response noting that the outline LEMP still lacks clear mapping of grazed grassland to be lost, retained and gained, but that the Applicant has advised that this will be submitted at a subsequent deadline. Comment noting that the outline LEMP provides additional detail on construction and operational mitigation. Further response noting that establishing a robust monitoring baseline for Bechstein's bats is challenging because acoustic surveys are ineffective and further invasive radio-tracking is undesirable, requiring secured collaborative data-sharing from existing HS2 licences, consistent replication of survey and analysis methodologies over time, and early commencement of baseline data collection to ensure construction and operational monitoring can reliably identify real trends in activity.	The **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** was updated at Deadline 2 to provide a clear overview of the current grazing regime on-site, where grazing would be lost, where grazing would be retained and where new areas of grazing are proposed. This is illustrated within **Appendix 6** of **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** (see **page 121**). The Applicant also shared this figure with Natural England ahead of issuing this Appendix at Deadline 2. The Applicant is in agreement with Natural England that a robust monitoring strategy is key and will need to have a collaborative approach with HS2 and other relevant partners. The requirement for a replicable baseline pre-construction is noted Additional information regarding the bat monitoring strategy will be included within the updated **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** to be submitted at Deadline 4. Further details of the bat monitoring strategy will be set out in the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** to be submitted at Deadline 4, The Applicant confirms that the strategy will include survey and analysis approaches that can be consistently replicated and applied across all relevant phases of the Proposed Development and will include details regarding the years that the data will be collected. The approach will be developed in consultation with Natural England.
5.1.8	8 (ExA Question 1.7.1 **General - review of deadline 1 documents** Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of	Response noting that the outline CEMP should be updated following the conclusions of the Bat Technical Study (paragraphs 2.4.1 and 2.4.2) which state that pre-construction assessments may be required. Indirect impacts (i.e. noise	The plant to be used during construction has not been selected. Once the actual plant to be used is confirmed, the noise assessment within the **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** will be updated at detailed design stage, prior to construction, as secured in the **Outline CEMP [EN010158/APP/7.2.4]** updated at Deadline 3 and by Requirement 11 of the **Draft DCO [EN010158/APP/3.1.5]**. This *may* involve specific measurements in the same format as undertaken for plant included in Reason & Wray, 2025 (Case study 38; PDF pp 231-238)[1]. This information will determine the need to refine the

[1] Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	during construction) should be addressed, as well as direct impacts (roost loss).	outline mitigation proposals for haul route construction (notably around trees that could support bat roosts), and the installation of solar PV modules and other infrastructure, and also if a PWMS is needed. However, given the information available to date, it is considered unlikely that such new information would affect the proposed offset distances from solar PV modules. The **Outline CEMP [EN010158/APP/7.2.4]** has been updated at Deadline 3 to include proportionate noise considerations for confirmed and potential bat roosts that could be directly or indirectly affected during the construction phase and these will be reflected in the species protection plans (secured within the **Outline CEMP [EN010158/APP/7.2.4]**) which will be produced alongside the detailed Construction Environmental Management Plan and detailed Landscape and Ecological Management Plan.
5.1.9	8 and 9 (ExA Question 1.7.24 **Monitoring** Do you consider that you should be consulted on, and approve the details of any proposed monitoring of bat activity during the operation of the proposed development, including any monitoring reports and adaptive mitigation measures – justify your answer.)	Response noting that a robust bat monitoring strategy is essential given the novel mitigation proposed, the sensitivity of the Bechstein's population and scientific uncertainty. Response continues that it is not clear whether the bat mitigation strategy will be a stand-alone document, or if it will form part of the LEMP. Further comment noting that embedding the bat mitigation strategy within the detailed LEMP (with commitments to provide monitoring reports to Natural England), secured by Requirement 7 of the draft DCO, would provide a secure and enforceable mechanism to review monitoring outputs and ensure the ongoing effectiveness of the proposed mitigation strategy.	Comment noted and Applicant is in agreement that a robust monitoring strategy is essential. Additional information regarding the bat monitoring strategy will be included within the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** to be submitted at Deadline 4. The structure of the monitoring strategy will follow that outlined in Ch9 of the CIEEM-published national Bat Mitigation Guidelines; this requires meaningful, objective, specific tests of those objectives and remedial actions to be specified. The Applicant intends for the final bat monitoring strategy to be embedded within the detailed Landscape and Ecological Management Plan. Accordingly, this commitment would be secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**, after the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** is updated at Deadline 4.

Table 5.2: Environment Agency [REP2-095]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.2.1	3 and 4 (ExA Q1.7.1 – Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that EA24 and EA25 (from the Environment Agency's (EA) Relevant Representation **[RR-081]**) have been resolved. EA26 remained unresolved as of Deadline 2, however engagement with the Applicant indicated that updates to ES Chapter 7: Biodiversity should address this. Following review, this position will be updated in the SoCG submitted at Deadline 3. The above is reflected under Ref 5.1 in the draft SoCG with the EA submitted at Deadline 2.	The Applicant provided an update to **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** at Deadline 2, providing an assessment of potential effects on relevant ecological receptors that could occur as a result of the proposed clear span bridge and provides details on mitigation measures that will be put in place to ensure there are no significant effects to receptors as a result. These measures are outlined and are secured by the **Outline CEMP [EN010158/APP/7.2.4]** and Requirement 11 of the **Draft DCO [EN010158/APP/3.1.5]**. The Applicant considers that these amendments appropriately address the EA's concerns in EA26. The Applicant welcomes the ongoing engagement with the Environment Agency. **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.3]** has been updated at Deadline 3 to reflect this agreement.
5.2.2	4 (ExA Q1.14.1 Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the applicant's responses or amendments have addressed your concerns regarding the impacts on land and groundwater matters. If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that EA11, EA12, EA13, EA15, EA16, EA17, EA19, EA20, EA21, EA22, EA29, EA31, EA33, EA34, EA35, EA38, EA40 and EA41 (from the EA's Relevant Representation **[RR-081]**) have been resolved, while EA14, EA18, EA23, EA27, EA28, EA30, EA32, EA36, EA37, EA39 and EA42 remained unresolved at Deadline 2. Comment that engagement with the Applicant indicated that further document updates were being submitted at Deadline 2 and that EA's position would be updated following review of these. This position will be updated in the SoCG submitted at Deadline 3.	The Applicant welcomes the ongoing engagement with the Environment Agency. **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.3]** has been updated at Deadline 3 to reflect this agreement.
5.2.3	5 (ExA Q1.14.7 Review the applicant's updates to ES Chapter 11 (Land and Groundwater) [REP1- 038] regarding the effects on groundwater dependent terrestrial ecosystems at Finemere Wood Site of	Response giving confirmation that the EA is satisfied that the Finemere Wood Site of Special Scientific Interest (SSSI) as a Groundwater dependent Terrestrial Ecosystem have been adequately detailed in ES Chapter 11, and that they consider this issue to be resolved, as	The Applicant welcomes the engagement with the Environment Agency and agreement on this matter.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	Special Scientific Interest – do you agree with the applicant's conclusions regarding the likely effects? If not, why not?)	reflected in the draft SoCG submitted at Deadline 2.	
5.2.4	5 and 6 (ExA Q1.20.1 Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the applicant's responses or amendments have addressed your concerns regarding the impacts on the water environment. If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response noting that geomorphology issue EA26 (from the EA's Relevant Representation **[RR-081]**) remains unresolved as of Deadline 2, however engagement with the Applicant indicated that further document updates were being submitted at Deadline 2 and that the EA's position would be updated following review of these.	**ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4.3] [REP2-055]** has been updated at Deadline 2 to include the following 'The access bridge will be clear span over the watercourse and constructed above the top of bank level as to not impede flows within the channel. Crossings over the channel will only be when required to limit potential interaction with water within the watercourse'. The EA has confirmed that this update resolves EA26. **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.3]** has been updated at Deadline 3 to reflect this agreement.
5.2.5	6 (ExA Q1.20.6 Are you satisfied that sufficient information on flood risk management regarding safe access and escape routes as part of an agreed emergency plan has been provided by the applicant, and that any residual risk could be safely managed over the lifetime of the development?)	Response noting that it is for the LPA to form a view on safe access and egress. The EA confirms no areas of residual flood risk which are of concern to the EA.	The Applicant welcomes the EA's comment that there are no areas of flood risk that are of concern to the EA.
5.2.6	6 and 7 (ExA Q1.20.7 Are you satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of schedule 3 of the Flood and Water Management Act 2010, including during the construction period?)	Response noting that it is for the Lead Local Flood Authority (LLFA) to provide advice on drainage/surface water and that the EA would defer to the LLFA's position on whether the proposed drainage system complies with National Standards.	Engagement with the LLFA has been undertaken and is summarised in the **Outline Drainage Strategy [EN010158/APP/7.11.4]** updated at Deadline 3. The Applicant's response to all comments raised by the LLFA on this issue during the Examination have been addressed in the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**.
5.2.7	7 and 8 (ExA Q1.20.13 Provide a view on the updated FRA [PDA004] and whether you have any	Response noting satisfaction that the Applicant:	**ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.4]** was updated at Deadline 2 and at Deadline 3 and includes further information on the outstanding points including:

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	outstanding concerns regarding the assessment or flood risk as a result of the proposed development.)	- has taken a sequential approach to the site layout - has addressed contradictions in terminology regarding flood risk - committed to providing compensatory flood storage (noting Outline CEMP is to be updated to include this commitment) However a number of outstanding matters/points of clarity remain, including: - freeboard above the design flood level for panel areas B1 and ensuring +600mm is achieved - the use of fencing in Flood Zone 3b - Application of upper climate change allowances - Suitability of the Risk of Flooding from Surface Water for informing fluvial flood risk.	1. Confirmation that Solar PV modules have been designed to be set at the following heights to ensure a minimum of 600mm freeboard: • 1800mm above existing ground levels in areas of fluvial flood risk. • 1500mm above existing ground in Field B1. • 800mm above ground levels elsewhere. 2. Perimeter fencing will be designed to be permeable in nature to ensure the effective passage of overland flow through the structure. As an indicative, the wire will either be a standard wire netting as used in forestry or have a smaller mesh at the bottom, close to the ground at around 75mmx75mm,with further detail on fencing to be provided at detailed design stage. 3. Updated hydraulic modelling was provided in the updated Flood Risk Assessment submitted at Procedural Deadline A for the 30% increase in fluvial flows associated with the 2050s Upper End climate change allowance. A sensitivity check on the hydrology used in the Claydon Brook Modelling has shown that the Q1000 inflows into the modelling is comparable to the Q100 plus 58% climate change allowance and therefore the Q1000 event is used to provide an estimate of the Q100+ 58% event. 4. The Risk of Flooding from Surface Water mapping has been used to represent a reasonable and, in this case, conservative proxy for flood risk from minor Ordinary Watercourses, including the effects of climate change. Further details are set out in section 3.2 of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.4]** as submitted at Deadline 3. This section provides a comparison between the various datasets used and justifies the use of the RoFSW as a proxy for fluvial flood risk where there is no site specific modelling data. **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.3]** has been updated at Deadline 3 to reflect this agreement.
5.2.8	8 and 9 (ExA Q1.20.14 Do you consider that the applicant has been able to demonstrate that the sequential test has been applied and satisfied as part of the site selection process? Explain your answer.)	Response noting that the EAs remit is to consider whether sequential approach has been applied to components on the Site, (as per EA02 and EA05 from the EA's Relevant Representation **[RR-081]**). These issues are considered resolved as permanent infrastructure is located in Flood Zone 1 where possible, Construction Compounds are located outside Flood Zones 2 and 3, and the Applicant has mapped components relative to Flood Zone 3b in the Flood Risk Assessment.	The Applicant welcomes the engagement with the Environment Agency on this matter and confirmation that all issues raised by the Environment Agency relating to the application of the Sequential Test to the Site are resolved.

Table 5.3: Forestry Commission [REP2-096]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.3.1	1 (ExA Q1.7.19 to BBOWT In your relevant representation [RR-020] and written representation [REP1-125] you suggest that a minimum buffer distance of 50 metres is required to designated woodland. Whilst noting the study referred to in your relevant representation, this does not represent guidance or a legislative requirement. The applicant has based the minimum buffer distance on guidance from Natural England and the Forestry Commission – why is this not deemed sufficient?)	Response recognising that the Applicant has considered standing advice on buffer size, but they would encourage larger buffers in this instance due to the scale of the development, the presence of Bechstein's bats and emerging (yet limited) evidence of impacts of solar panels on bats. They recommended a 50m buffer from Ancient Woodland, comprising 25m of high-quality habitat and a further 25m separation from the solar panels.	The Applicant is fully cognisant of the scientific literature with regards to the potential effects of solar panel on bats and this information has been used to inform the assessment undertaken. As stated on numerous occasions within **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006] and **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086], the embedded mitigation detailed in **Table 7.6** of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** and secured by the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] and Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**, all woodland habitat is retained and includes a minimum 30m offset from all ancient woodland with an additional 5m from solar PV modules to the security fence which exceeds Natural England and Forestry Commission standing advice of 15m offsets to protect the ancient woodland sites. 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 that: *"Potential direct and indirect impacts to the interest features of the SSSIs have been appropriately assessed. Natural England agree with the conclusion that there are no residual impacts (after mitigation) on SSSIs."* In addition, Ref. 1.12 within Table 2 of the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14]** [REP1-025] demonstrates that Natural England are content with the approach taken to the avoidance of harm through the implementation of offsets from sensitive habitats including trees, hedgerows and ancient woodland. Therefore, in combination with the mitigation measures proposed within the **Outline CEMP [EN010158/APP/7.2.4]** and secured by Requirement 11 of the **Draft DCO [EN010158/APP/3.1.5]**, the proposed buffers are sufficient to protect ancient woodland. It should also be noted that local policy of 50m buffers from ancient woodland applies to all development types in general and doesn't take into account that solar development is less intrusive/impactful than other development types e.g. housing developments.
5.3.2	2 and 3 (ExA Q1.7.4 to the Applicant Are any areas of woodland proposed to be created? If not, why not?)	Response noting concern regarding the isolation and fragmentation of ancient woodland across the Site, specifically referencing Decoypond Wood, Sheephouse Wood and Shrubs Wood. The Forestry Commission support Natural England's recommendation of removal of Solar PV panels from Fields B6, B7 and B8, encouraging the potential for woodland creation within these fields to connect western woodland blocks in line with LNRS priorities. The Forestry Commission have provided further guidance on policy and legislation relevant to	The Applicant is proposing to create approximately 8.5ha of woodland across the Site, as detailed within paragraph 4.3.13 of the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] and secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. The Proposed Development would not result in the isolation or fragmentation of ancient woodland. The locations of mitigation areas have been chosen to ensure connections between the existing SSSIs, and ancient woodland adjacent to the Site would be enhanced, through the embedded design buffers from hedgerows, woodlands, watercourses and ponds with habitat creation and enhancement measures proposed within these buffers to create a coherent ecological network to link the Site to the wider landscape, supporting the movement of local wildlife, particularly bats. The Applicant is fully aware of the importance of the LNRS. Mitigation planting is detailed in the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] and secured by Requirement 7 of

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		ancient woodland within the appendix to their submission.	the **Draft DCO [EN010158/APP/3.1.5]** and includes the creation and enhancement of habitats, where appropriate, in line with the LNRS priorities, specifically priority *M1: Buffer and connect ancient woodlands, while preserving and enhancing other Priority Habitats such as chalk grassland, floodplain meadows* - 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.

Table 5.4: Philip Claridge on behalf of A.E.J. & F.J. Claridge [REP2-123]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.4.1	1 to 2 (ExA Question 1.9.3 on Replacement land Please provide feedback regarding the suitability of replacement land offered by the applicant.)	Comment noting that although the replacement land is similar in acreage, it is not a genuinely equivalent substitute as it lacks the long-term improvements, infrastructure, access, integration and efficiency of the existing holding which the family have instated since 1971. Further comment noting that the swap would introduce additional operational complexity, dependency on shared infrastructure and ongoing costs.	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption.
5.4.2	3 and 4 (ExA Question 1.9.3 on Replacement land Please provide feedback regarding the suitability of replacement land offered by the applicant.)	Comment noting that the land proposed for acquisition is integral to the core holding around Knowlhill Farm, supporting forage, cereals and grazing, and that its loss, field subdivision, increased distance from the steading, and concurrent reduction in grass keep would fragment the farming system and materially reduce the business's efficiency, carrying capacity and overall functionality	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption.
5.4.3	4 and 5 (ExA Question 1.9.3 on Replacement land Please provide feedback regarding the suitability of replacement land offered by the applicant.)	Comment noting that the Book of Reference identifies the permanent acquisition of the farm's well which would remove an essential and irreplaceable item of livestock water infrastructure, with no secured arrangements for continued access or an equivalent alternative, resulting in a material and unacceptable impact on the operation, welfare, resilience and day-to-day management of the farming business.	The Applicant was already aware of the need and access to the well, which is located in Plot 1/11 (Field B17), for its use and had considered this within its design, however, firm commitments has been provided updated **Design Commitments [EN010158/APP/5.9.5]** which states *"The agricultural well within Field B17 will remain in situ and access for the tenants will be retained on its current alignment."*
5.4.4	6 and 7 (ExA Question 1.9.3 on Replacement land Please provide feedback regarding the suitability of replacement land offered by the applicant.)	Comment noting that the Land Plans (plot 2/6) proposes permanent acquisition of new rights over agricultural buildings and hardstanding at Knowlhill Farm would affect a core operational farmyard area, with insufficient clarity on the nature and extent of those rights and a real risk of ongoing interference with machinery movements, livestock management, safe working practices and future use of essential farm infrastructure.	The Applicant no longer requires rights over Plot 2/6 and has updated the **Land Plans [EN010158/APP/2.2.4]**, **Works Plans [EN010158/APP/2.3.4]** and **Draft DCO [EN010158/APP/3.1.5]** at Deadline 3 to reflect that it is no longer seeking any rights over this plot. The Applicant notes that the plot is still within the Order Limits (i.e. the red line boundary) but it is not within the Order Land (meaning no land powers are sought over it). The distinction between the Order Limits and the Order Land is explained at paragraph 1.2.5 of the **Statement of Reasons [EN010158/APP/4.1.3] [REP1-010]**.
5.4.5	7 (ExA Question 1.9.3 on Replacement land Please provide feedback regarding the suitability of	Comment noting that construction activity across or adjacent to the holding would cause sustained and material harm to the livestock operation by disrupting essential daily management, increasing safety risks and animal stress, and restricting access for critical farming activities, which cannot be paused or mitigated as a	Commitments given in the **Outline CEMP [EN010158/APP/7.2.4]** will deal with this matter and minimise the impact during construction. The updated **Outline CEMP [EN010158/APP/7.2.4]** will give commitments as follows: • The Applicant will liaise with tenants during the preparation of the detailed Construction/Operational/Decommissioning Environmental Management Plan(s)

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	replacement land offered by the applicant.)	temporary inconvenience over a prolonged construction period.	and subsequently during the construction phase. Measures to be included in the detailed Construction/Operational/Decommissioning Environmental Management Plan(s) will include: • Providing advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land; • Appropriate biosecurity measures reflective of the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and • Provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above." The **Outline CEMP [EN010158/APP/7.2.4]** has been updated at Deadline 3 to give a commitment to 6 months notice so as to help the farming tenants manage the farming operation in an effective way.
5.4.6	8 (ExA Question 1.9.3 on Replacement land Identify measures that could minimise disruption to the ongoing operation of farming during any transfer to replacement land.)	Comment noting that minimising disruption would require suitably located and fully serviced replacement land to be available and operational in advance, together with stringent controls on construction activity to maintain safe access and protect the integrity of daily livestock operations, without which the impact on the farming business would be significant.	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption. Commitments given in the construction management plan **Outline CEMP [EN010158/APP/7.2.4]** deal with controls on construction activity, including access and bio security, and how this will be managed once construction details are known.
5.4.7	8 and 9 (ExA Question 1.9.3 on Replacement land If agreement is reached with the applicant regarding the provision of replacement land, to what extent would this address any concerns that you may have regarding the compulsory acquisition of your land interests?)	Comment noting that while replacement land may mitigate the loss in area, it does not address the core impacts of relocation away from the steading, loss of long-established improved land, fragmentation of the holding, construction disruption and ongoing inefficiency, and therefore does not provide a fully effective or equivalent solution.	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption.
5.4.8	9 (ExA Question 1.9.3 on Replacement land)	Comment noting that the Proposed Development raises serious concerns about the long-term security and continuity of the farming business by undermining the stability provided by the long-standing Agricultural Holdings Act tenancy and driving changes to the tenancy structure on which decades of investment and operation have been based.	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption. The Applicant further believes that the terms offered secure the long-term occupancy in this location for this tenant. In response to the issues raised regarding the continuity of the farming business, the Applicant is cognisant of the Secretary of State's recent decision letter accompanying The Springwell Solar

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		Further comment noting that the Proposed Development would undermine the long-term stability and continuity of a well-established farming enterprise by incentivising changes to long-standing tenancy arrangements, which, when combined with the land take and operational impacts identified, materially alters the foundation on which the business has been developed over decades.	Farm Order 2026 which stated that the impacts on food production should be included in the ES. The Applicant will address this matter at a later deadline.
5.4.9	10 (ExA Question 1.9.3 on Replacement land)	Comment noting that the Applicant has not demonstrated that the proposed replacement land offers a comparable practical farming outcome, that the full operational impacts have been adequately addressed, or that the scale of land take and disruption is proportionate to the needs of the Proposed Development. Further comment that the proposals would therefore have a lasting effect on a well-established farming business warranting careful consideration.	This matter is being addressed as part of the wider Legal Agreement between the Claridges and the Claydon Estate, the terms of which are confidential. Heads of Terms for the replacement land have been signed, and each party continues to be represented by solicitors as the Legal Agreement is negotiated. The Applicant is satisfied that the Claridges will be able to continue their business operations with minimal disruption.

Table 5.5: Preston Farms and TCS Biosciences Ltd [REP2-107]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.5.1	1 (Introduction)	Comment noting that Preston Farms Limited and TCS Biosciences Limited remain willing to engage constructively but they have seen no improved understanding of their concerns or need for layout changes from the Applicant. Comment noting that the proposals remain too uncertain, with only vague mitigation commitments noted once the , preventing proper assessment of operational viability.	The Applicant notes the update provided by Preston Farms Limited and TCS Biosciences Limited. The Applicant confirms that negotiations are progressing and that the Applicant is committed to continuing to engage in an effort to resolve all outstanding issues to the satisfaction of both parties.
5.5.2	2 (ExA Question 1.9.3 on Replacement land)	Response noting that Preston Farms Limited is still awaiting a draft agreement for the replacement land, that substantial works including fencing, gateways, water provision and groundworks are required to make it accessible and functional, and that responsibility for delivering these improvements remains unclear.	A draft agreement has been issued to Preston Farms Limited to which responses are awaited and details from Preston Farms Limited as to their requirements for the accommodation works requested.
5.5.3	2 and 3 (ExA Question 1.16.14 on Mitigation and monitoring)	Response that the updated outline CEMP, outline OEMP and outline DEMP do not address their concerns regarding mitigation measures or monitoring for noise. Further comment that the construction-phase noise and disturbance concerns remain unresolved because the Applicant continues to rely on access via Granborough Road without justifying why access from Winslow Road is not feasible. Comment that the Applicant's updates leave too much to future detail and provide no basis for concluding that the proposed mitigations would be workable for Preston Farms Limited's business as a sensitive livestock operation given prolonged construction, limited land flexibility, and uncertainty about the effectiveness of proposed measures and the expectation of consistent compliance. Further response that the updated Noise and Vibration Chapter does not substantively respond to the issues raised, as it continues to rely on human-receptor-based assessments, fails to recognise Preston Farms/TCS Biosciences as a distinct sensitive receptor, and gives no indication that appropriate, tailored risk assessments or mitigation measures have been developed for the sensitive and regulated nature of their operation. Comment that a more rigorous methodology supported by further	The **Outline CEMP [EN010158/APP/7.2.4]**, **Outline OEMP [EN010158/APP/7.3.4]**, and **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.4]** were updated at Deadline 1 to include the following in regard to Preston Farms and TSC Biosciences Ltd: *"The Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd (together, 'the Prestons') during the preparation of the detailed Construction/Operational/Decommissioning Environmental Management Plan(s) and subsequently during the construction phase. Measures to be included in the detailed Construction/Operational/Decommissioning Environmental Management Plan(s) will include:* • *providing advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land;* • *appropriate biosecurity measures reflective of the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and* • *Provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above."* The above measures would sufficiently manage the noise, construction and biosecurity concerns raised by the Preston Farms and TCS Biosciences Ltd and would ensure that these are carefully and sensitively managed throughout the construction, operation (including maintenance) and decommissioning phase. As stated, further information will be included in the detailed environmental management plans, that will be produced following the detailed design, should the Proposed Development obtain consent, in consultation with Preston Farms and TSC Biosciences Ltd. The detailed environmental management plans are secured by the **Draft DCO [EN010158/APP/3.1.5]** which is a standard mechanism for a project of this scale and commits

		engagement with Preston Farms / TCS Biosciences and the application of workable mitigation measures is required.	to the Applicant to provide further detail following consent and detailed design which would be approved by the relevant local planning authority. Access is not feasible through Winslow as it would divide the works into two separate areas and place construction traffic through Winslow, which is against the general access strategy outlined since the inception of the project. By adopting a different access strategy, traffic would pass through villages, resulting in additional impacts and requiring a full access junction, requiring the removal of significant areas of hedging and trees to provide the necessary visibility splays, which are not required for an abnormal load only access. There are currently no reliable studies which enable an adverse effect to be linked to a measured noise level for horses, and therefore engagement with and maintenance of good communications between the Applicant, their contractors and Preston Farms/TCS Biosciences throughout the Proposed Development is of key importance. Paragraph 13.9.10 of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** included a commitment to carry out liaison and communication throughout the construction phase to provide information to people residing in properties located in the vicinity of the Order Limits. The community liaison included those with livestock or other animals that may be present in fields adjacent to the construction works. As part of Deadline 1, the **Outline CEMP [EN010158/APP/7.2.4]** was updated to include further commitments regarding consultation and mitigation related to livestock. A Noise and Vibration Technical Study was submitted at Deadline 2 to provide further information regarding the effects of noise and vibration on livestock and set out how guidance has been used to further develop the approach to monitoring, mitigation and engagement secured within construction and operational management plans. This is contained in Annex A to Appendix 1 of the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.
5.5.4	3 and 4 (ExA Question 1.16.14 on Mitigation and monitoring)	Response noting that a noise and disturbance assessment for Preston Farms/TCS Biosciences should include defined species-appropriate noise thresholds, baseline and activity-linked monitoring with clear exceedance responses, further consideration of BESS-related risks and cumulative disturbances, transparent engagement and approval mechanisms for future detailed plans, clarity as to engagement and approvals required in relation to any future detailed plans and a response to the concerns previously set out in the Party's Written Representation which Preston Farms / TCS Biosciences consider to be either unaddressed or include generic process language. Further comment noting that these matters remain unresolved or deferred to generic future management, with the Applicant retaining broad flexibility, failing to precisely	To address concerns raised by Preston Farms Limited and TCS Biosciences Ltd, a Noise and Vibration Technical Study was submitted at Deadline 2 to provide further information regarding the effects of noise and vibration on livestock 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. This is contained in Annex A to Appendix 1 of the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**. The submitted document is similar in nature to the document prepared for the Morgan and Morecombe Wind Farm development[2], as specifically recommended by the acoustic consultant working on behalf of Preston Farms Limited and TCS Biosciences Ltd (Sharps Acoustics). As noted by Sharps Acoustics, there are currently no reliable studies which enable an adverse effect to be linked to a measured level for horses, and therefore engagement with and maintenance of good communications between the Applicant, their contractors and Preston Farms/TCS Biosciences throughout the Proposed Development is of key importance, as advocated by Sharps Acoustics.

[2] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020032-002486-S_D6_9_MMTA_Managing%20Construction%20Noise%20at%20Equestrian%20Receptors_F01.pdf

		define the rights sought, and offering no assurance that the Proposed Development would not cause harm to Preston Farms and TCS Biosciences' animals and operations that those parties have previously identified.	To account for this, as part of Deadline 1, the **Outline CEMP [EN010158/APP/7.2.4]** was updated to include the following commitment in respect of this within Section 2.9. Control of Noise:
			
			"Potential disturbance to livestock would be managed through appropriate consultation with the relevant land interests so that they are aware of the construction works that will be taking place close to particular fields. In addition, the control measures with regards to noise set out in The British Horse Society document 'Advice on Construction sites and horses' would be implemented, where applicable."
			
			In addition, the following statement is included with Section 2.10 of the **Outline CEMP [EN010158/APP/7.2.4]**:
			
			"Potential disturbance to livestock would be managed through appropriate consultation with the relevant parties. Where specific concerns are raised, temporary measures would be introduced to reduce the construction induced noise levels experienced by livestock, where appropriate."
			
			The specific mitigation measures that are implemented will depend on the timing of the works and the location of the livestock at that time. A six-month advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land would be provided, so that an effective mitigation strategy can be determined. Potential measures that would be considered include:
			
			• Working with Preston Farms to establish ways in which livestock can be located away from construction activities, including:
			  • Undertaking works when livestock are stabled during winter months.
			  • Temporary use of other areas of land within the Order Limits during construction.
			  • Amendments to the land-use strategy, so that fields closest to construction areas are used for crop, rather than grazing.
			• Implementation of Best Practicable Means to control noise and vibration levels.
			• Use of temporary noise barriers.
			• Use of alternative low-noise and low-vibration techniques e.g. rotary bored piling in lieu of percussive.
			• Routing of construction traffic to minimise noise levels in surrounding fields.
			• Implementation of the British Horse Society recommendations.
			
			The commitment for the Applicant to liaise with Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed Construction Environmental Management Plan(s) and subsequently during the construction phase is secured in Section 2.22 of the **Outline CEMP [EN010158/APP/7.2.4]**.
			
			During the operation (including maintenance) phase, noise emissions will generally be steady-state or gradually increasing/decreasing and therefore are unlikely to cause disturbance to horses and sheep. Notwithstanding this, mitigation measures to reduce operational noise have been introduced to minimise the likelihood of adverse effects. A series of measures have been adopted into the design of the Proposed Development to avoid or reduce the potential stress on animals as far as practicable.

			Within certain parts of the Preston Farms' grazing fields, there is potential that the horses and sheep may currently be exposed to noise levels which exceed the highest predicted operational phase noise levels generated by the Proposed Development e.g. in the vicinity of local road links which bound certain fields, where noise levels of 55-60 dB $L_{Aeq,16hr}$ at 10m would be anticipated. Other short-term events will also generate elevated noise levels, such as agricultural works involving noise emitting plant/machinery, and aircraft movements.
5.5.5	4 and 5 (ExA Question 1.16.14 on Mitigation and monitoring)	Comment noting that effective biosecurity at Preston Farms/TCS depends on the way the holding operates as a whole including low-disturbance site conditions, rather than individuals acting in accordance with protocols alone, and that the Applicant's generic, light-touch measures fail to address increased biosecurity risks arising from the Proposed Development's layout, access arrangements, extensive nearby construction activity, and prolonged third-party presence. Comment that the most reliable biosecurity control is to avoid introducing unnecessary disturbance and third-party factors to the operating environment and securing greater separation from the core holding and the Proposed Development. Further comment noting that the current Proposed Development's layout and level of construction and operational activity are inconsistent with maintaining a tightly controlled biosecure environment, and that references to "appropriate biosecurity measures" fail to address the core concern that the Proposed Development would itself undermine the conditions on which effective biosecurity depends.	The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to animal welfare and biosecurity) both in the iterative development and design of the Proposed Development, and in the approach to adaptive, flexible and best-practice mitigation. Further detail and site specific measures will be agreed with the Preston Farms and TCS Biosciences Ltd during the detailed design stage. The **Outline CEMP [EN010158/APP/7.2.4]**, **Outline OEMP [EN010158/APP/7.3.4]**, and **Outline DEMP [EN010158/APP/7.4.4]** were updated at Deadline 1 to include management measures specifically in response to concerns raised about biosecurity and the impacts on Preston Farms and TCS Biosciences Ltd These include measures as follows: *"The Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd (together, 'the Prestons') during the preparation of the detailed Construction/Operational/Decommissioning Environmental Management Plan(s) and subsequently during the construction phase. Measures to be included in the detailed Construction/Operational/Decommissioning Environmental Management Plan(s) will include:* • *Providing advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land;* • *Appropriate biosecurity measures reflective of the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations; and* • *Provision of toolbox talks to relevant site staff about the sensitive nature of the Prestons' specialist operations, and the processes around the measures above."* Detailed biosecurity measures for the detailed Construction Environmental Management Plan(s) and detailed Operational Environmental Management Plan(s) will be developed in consultation with Preston Farms based on best practice. The replacement land agreed with Preston Farms is contiguous with Preston Farms existing holding ensuring animal movement can be maintained in a secure environment. During operation, the use of Parcel 3 and the associated access over plot 6/12 will be low. As set out above, the Applicant will put in place measures to ensure that interactions between site operators and horse and/or sheep do not occur. Access during construction will be more frequent and, in a similar way to noise impacts, the Applicant will work with Preston Farms to mitigate any potential biosecurity issues. Such measures might include temporary additional land or rotation grazing plans during construction. The Applicant remains committed to working with Preston Farms to agree site-specific measures during the detailed design phase, should consent be granted for the Proposed Development, that can be committed to, monitored and adhered to and remedial action agreed in the event of a failure. The Applicant has committed to and will continue to commit to securing

			proportionate and practicable measures to support the existing biosecurity standards following detailed design, should the Proposed Development get consented.
5.5.6	5 and 6 (ExA Question 1.17.1 on Critical National Priority (CNP))	Comment noting that Preston Farms/TCS Biosciences submit that the Proposed Development is capable of constituting an unacceptable risk to, or causing unacceptable interference with, human health and public safety due to the potential disruption of a unique, nationally critical diagnostic supply chain, for which the Applicant has provided neither assurance nor an adequate risk assessment for. Comment providing examples of recent uses of Preston Farms/TCS Biosciences' product in Kent and the Middle East. Further comment that Preston Farms/TCS Biosciences does not seek to prevent the Proposed Development and states that the changes sought are limited and would have negligible effect on the Proposed Development's contribution to net zero policy.	Paragraph 4.1.7 of NPS EN-1 (2023) concludes by recognising that the presumption of the needs case afforded to CNP projects will outweigh residual adverse effects in all but the most exceptional cases, being scenarios where the residual impact(s) present an unacceptable risk to, or interference with: • human health and public safety; • defence; • irreplaceable habitats; or • poses an unacceptable risk to the achievement of Net Zero. The Applicant considers that any residual impacts on Preston Farms Ltd and TCS Biosciences Ltd would not constitute an exception to the CNP policy, and observes that no evidence has been provided to support Preston Farms' submissions that there is an *"unacceptable risk to, or unacceptable interference with"* any of the categories of exception listed above. **Appendix 1** to the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** has been prepared to provide a single source of responses to the specific matters and issues raised by Preston Farms Ltd and TCS Biosciences Ltd. This Appendix sets out the Applicant's current understanding of the Preston Farms operation, the potential impact of the Proposed Development on Preston Farms, and steps taken to mitigate them. Having had chance to review and respond to Preston Farms' Deadline 1 submission **[REP1-133]**, the Applicant maintains its assessment in the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** which is that none of the above exceptions apply in relation to the Proposed Development and, therefore, the CNP policy applies in full. The Applicant notes that the question of the importance of sustainable national supply of donor animal blood supply for use across the NHS was raised in a parliamentary debate on 28 April 2026[3]. The Parliamentary Under-Secretary for Health and Social Care stated that: • *The Department recognises that animal blood-enriched agar is a critical component in microbiological diagnostics, and we recognise the importance of a sustainable and secure supply of such materials.* • *There are a number of suppliers on NHS Supply Chain's current framework which offer donor animal blood supply for diagnostic use which support a level of resilience across England. To date there has been no issues with supply.* • *Where challenges in the supply of key products arise, these would be escalated to the Department's National Supply Disruption Response, which works collaboratively with suppliers, manufacturers, and system partners to understand the nature of the disruption and to support appropriate mitigations.*

[3] Blood Agar: 28 Apr 2026: Hansard Written Answers - TheyWorkForYou

			While the NHS and the Department for Health and Social Care have not provided representations to the examination, the above comment suggests that there is a mitigation route in place, should there be any challenges in the supply of key products. Please refer to the Applicant's response to Q1.17.1 within the **Applicant's Responses to the Examining Authority's First Written Questions (ExQ1) [EN010158/APP/8.13] [REP2-087]** for further detail.
5.5.7	6 and 7 (ExA Question 1.17.4 on Embedded mitigation: corridor for grazing animals in field E23)	Comment noting that (notwithstanding further veterinary evidence), the proposed corridor through Field E23 is unworkable for horse safety or farm operations and such a corridor cannot be a substitute for maintaining Field E23 as an open, integral field with linking gateways. Comment that for this field to continue to operate effectively numerous corridors (or the majority of the field) would be required to connect each existing gateway. Further comment that it remains unjustified by the Applicant as to why this cannot be left free of panels, given its small proportion of the wider search area and the unresolved question of why panels cannot be relocated to a less harmful configuration.	The current design seeks to maximise energy generation near the point of connection at the National Grid East Claydon Substation and make efficient use of the land, to meet the urgent need for renewable energy as CNP infrastructure, as set out within NPS EN-1 (2023). In response to concerns about the impact of infrastructure in Field E23 on neighbouring grazing fields, the Applicant has removed the Field E23 from the siting zones for BESS and for the project substation. Replacement land of similar size has been offered to compensate for the loss of grazing land and Heads of Terms for the replacement land were agreed between the Claydon Estate and Preston Farms in September 2025. In order to enable the movement of horses and sheep through Field E23, Design Commitment G2 in **Design Commitments [EN010158/APP/5.9.5]** commits to the creation of a corridor in Field E23 for grazing animals in consultation with tenants, with a minimum width of 20m. The British Horse Society's 2025 'Advice on solar farms near routes used by equestrians', whilst not tailored to the specifics of Preston Farms Ltd and TCS Biosciences Ltd.'s circumstances, identifies that care should be taken in solar farm design not to create narrow corridors through solar farms, as tall fencing along the corridors could be intimidating and narrow corridors could create confinement with no 'escape space'. The British Horse Society recommends a minimum useable width of 4m between fences, which they indicate means that fence lines should be a minimum of 5m apart. Consequently, a 20m corridor is four times the width of the minimum recommended by the British Horse Society and provides a substantial corridor for the passage of horses. The final width and location(s) of grazing corridor(s) will be determined in consultation with the tenants/businesses at the detailed design stage. However, the Applicant has not to date received compelling evidence that solar PV development in Field E23 would result in a significant effect on the businesses, in light of the replacement land available and the mitigation proposed in Design Commitment G2.
5.5.8	7 to 9 (ExA Question 1.19.13 on the oCTMP: co-ordination with local business and visitor attractions)	Comment noting that the Applicant's updates to the outline CTMP are welcome but only in part, as improved liaison with agricultural interests and traffic information sharing does not resolve the incompatibility of routing construction traffic via Granborough Road with the safe and continuous operation of Preston Farms/TCS Biosciences. Further comment noting that substantial works may be required to Granborough Road itself, including widening, passing places and other highway/traffic management works which is of concern to the operation of Preston Farms/TCS Biosciences.	The impact of construction traffic is described in detail and works to provide access improvements are detailed in the **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and and **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.3] [REP2-065]**. The effect of peak construction traffic post-mitigation is not significant. Granborough Road is a public road, available to all road users. The mitigation works described in Annex 1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** are small scale and will improve traffic flows for all road users, including TCS Biosciences. The use of Granborough Road provides direct and efficient connection between the whole of the site and avoid the need for construction traffic to pass through villages and built up areas.

		Comment noting that reliance on Granborough Road remains unjustified and highly disruptive to year-round, time-critical farm and laboratory movements, with evolving and ill-defined highway works, no clear reason why Winslow Road cannot be used instead (as proposed as part of other local schemes), and inadequate governance arrangements that fail to include Preston Farms/TCS Biosciences directly in traffic management decision-making group under the outline CTMP.	Access is not feasible through Winslow as it would divide the works into two separate areas and place construction traffic through Winslow, which is against the general access strategy outlined since the inception of the Proposed Development. Such a division of access is inefficient, would lead to further cumulative impacts from other schemes access through Winslow and will result in significant vegetation loss in creating a non-abnormal load access junction to accommodate visibility splays which are not required for an abnormal load only access junction. The make-up of the Traffic Management Group as described in Paragraph 4.1.2 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** has been determined to ensure that the group can be effective and focussed. It would be wholly unfair to allow one commercial business a place, when there are other interested parties across the surrounding area. The elected members and parish council members will be representing their communities at the group and can act as a conduit for comments from all businesses in the area, including TCS Biosciences. It is also important to note that the Traffic Management Group as described in Paragraph 4.1.2 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** is not the only means of engagement and that a direct line of engagement between the Applicant, contractor and TCS Biosciences will be created to ensure the safe and efficient interactions, when requested.
5.5.9	11 and 12 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that although the Applicant's own plume assessment identifies Preston Farms as lying in the most probable downwind direction for any BESS release, it fails to model any on-site animal or operational receptors there (such as the farm itself) and, instead, relies on distant residential receptors assessed against human health standards, which is fundamentally misconceived.	The prevailing wind direction at the Site, as assumed to be as at RAF Benson meteorological station between 2020 and 2024, is Southerly (180°), with there also being a high frequency of south-southwesterly, southwesterly and north-northeasterly winds. Therefore, the Preston Farms Holding to the South of the BESS site, which is the closest potential transient receptor location, is not in the prevailing wind direction. Based on the data from RAF Benson, the probability of the wind blowing in a single 10-degree sector between 340° and 20° (i.e. towards the Preston Farms Holding to the South of the BESS site) is no greater than 5% over a 5-year period. There are Preston Farms field holdings situated North/North-East of the BESS site and will be influenced by near-prevailing winds. Therefore, under any BESS thermal runaway event, it would be more probable that these locations would be impacted. However, they are positioned further away from the BESS than the holdings to the South, as there is a highway (Claydon Road) separating the fields. Acute Exposure Guideline Levels (AEGLs) are used by emergency planners and responders worldwide as guidance in dealing with rare or accidental releases. AEGLs are calculated for five relatively short exposure periods – 10 minutes, 30 minutes, 1 hour, 4 hours, and 8 hours – as differentiated from air standards based on longer or repeated exposures. AEGL "levels" are dictated by the severity of the toxic effects caused by the exposure, with Level 1 being the least (notable discomfort) and Level 3 being the most severe (Life-threatening health effects or death). To address the additional concerns from the interested party, the Applicant has included an additional design commitment in the **Design Commitments [EN010158/APP/5.9.5]** to ensure that the installed BESS units are sited at least 50m away from the edge of the southern field boundaries in both Fields D8 and D9 and the eastern field boundary in Field D9, to provide further comfort that the HF 10-minute levels would be below the AEGL1 limit threshold within the surrounding livestock fields in the event of a thermal runaway occurrence. The current modelling already determines that within the surrounding fields the HF 1-hour levels are below AEGL1 (notable discomfort) and at 50m would be below all HF AEGL1s, including the

			10-minute scenario, with this being the conclusion of the Atmospheric Dispersion Modelling study and meets the current NFCC guidelines for sensitive receptors. This new commitment is being included to provide further comfort to the interested party which is additional to the current scope of the Plume and Atmospheric Dispersion Modelling Study. At post consent, an updated Plume Study will be commissioned using updated BESS data and infrastructure layouts to check that in the final design the exposure limits within the surrounding fields are no worse than those included within the current initial Plume Modelling Outputs.
5.5.10	12 and 13 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary's modelling of receptor R12 as a single dwelling and applying only human AEGL/SLOT/SLOD thresholds fails to represent the spatial extent and animal sensitivity of the Preston Farms operation. Further comment that the assessment ignores the higher concentrations that are likely closer to the BESS. Further comment noting that the assessment relies on an emergency response model which is inapplicable to livestock that cannot be sheltered or evacuated, with further comment that the assessment overlooks the risk that even sub-acute plume exposure and associated stressors could compromise donor blood quality and continuity of a NHS supply chain.	The scope of the Applicant's study is based on the UKHSA criteria, NFCC guidance Grid scale energy storage system planning - Guidance for fire and rescue services - NFCC and Local Air Quality Management Technical Guidance (LAQM TG22) [4]published by DEFRA. These documents provide a framework for air quality considerations (including assessment receptor selection), promoting a consistent approach for the treatment of air quality issues. Acute Exposure Guideline Levels (AEGLs) are used by emergency planners and responders worldwide as guidance in dealing with rare or accidental releases. AEGLs are calculated for five relatively short exposure periods – 10 minutes, 30 minutes, 1 hour, 4 hours, and 8 hours – as differentiated from air standards based on longer or repeated exposures. AEGL "levels" are dictated by the severity of the toxic effects caused by the exposure, with Level 1 being the least (notable discomfort) and Level 3 being the most severe (Life-threatening health effects or death). The nearest residential receptors downwind of a modelled BESS incident (R3, R4 and R5), located on Weir Lane in Botolph Claydon and Lower Farm, have been included in the study. In this case, based on the above guidance, livestock within TCS Biosciences/Preston Farms' holdings are not routinely required for consideration (the UK air quality objectives (AQOs) and by logical extension the AEGLs do not apply to animals, as further detailed in the response below). It is not practical to include and report results for sensitive receptors at each location within a modelling domain. However, the use of a receptor grid has allowed predictions at all downwind areas and all of the TCS Biosciences/Preston Farms fields. In this case, impacts across a 5km x 5km with a 20m resolution grid centred on the site have been predicted. Furthermore, the use of an advanced Gaussian model, such as ADMS 6, allows concentrations to be predicted at each receptor for every hour of the year (and sub-hourly, if required), thus accounting for all conditions provided within the meteorological files, including all downwind conditions. Figure 5.1 within the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** presents contoured concentrations for the 100th percentile 1-hour hydrogen fluoride (HF) concentrations across the modelling domain, including the entire Preston's farm holdings area. Furthermore, to compare the impacts against the AEGLs, 100th percentile concentrations are predicted; therefore, the impacts presented within the Plume Assessment Addendum are worst-case predictions across 5 years of meteorological data, and in this case, any of the four worst-case battery locations modelled. Thus, it is judged that the model setup has fully resolved downwind

[4] LAQM-TG22-May-25-v2.1.pdf

conditions. Two additional contours of the 100th percentile 1-hour hydrogen fluoride (“HF”) concentrations in higher resolution are also presented in Appendix 1 for clarity.

The contours presented in Appendix 1, and in the Plume Assessment, demonstrates that all predicted impacts during a BESS incident are below the assessed Air Quality Levels (AEGLs and AQOs, etc.) at all applicable receptors, including a footpath 50m away from the BESS.

The exact 10-minute HF concentrations within the Preston’s farm holdings have not been determined at this stage, as the Applicant was unaware of the sensitivity of the livestock in the field and the time-consuming nature of predicting the 10-minute concentrations using ADMS 6’s fluctuation module across a grid. However, the current BESS design is indicative and based on conservative assumptions at this stage. At the post-consent stage, an updated Plume Assessment will be carried out that can include additional receptor locations, derived in consultation with the tenants, to ensure that all key locations have been considered.

To address the additional concerns from the interested party, the Applicant can include an additional commitment in the **Design Commitments [EN010158/APP/5.9.5]** to ensure that the installed BESS units are sited at least 50m away from the edge of the southern field boundaries in both Fields D8 and D9 and the eastern field boundary in Field D9, to provide further comfort that the HF levels in the 10-minute modelling scenario would be below the AEGL1 limit threshold within the surrounding livestock fields in the event of a thermal runaway occurrence.

The current modelling already determines that within the surrounding fields the HF levels in the 1-hour scenario are below AEGL1 (notable discomfort) and at 50m would be below all HF AEGL1s, including the 10 minute scenario, with this being the conclusion of the Atmospheric Dispersion Modelling study and meets the current NFCC guidelines for sensitive receptors. This new commitment is being included to provide further comfort to the interested party which is additional to the current scope of the Plume and Atmospheric Dispersion Modelling Study.

Air quality emission monitoring equipment for emergency responders used to detect HF is typically set with a threshold of 0.2 ppm to ensure appropriate response measures are taken - emissions below this level can be considered to have no significant impact on any receptor. Published HF toxicology studies, including animal studies considered in the derivation of human emergency exposure criteria, provide additional supporting context for the assessment methodology adopted. Whilst AEGLs are human-health emergency planning thresholds, the available toxicological evidence indicates that animal exposure studies associated with limited or no significant effects were generally undertaken at concentrations materially higher than the conservative AEGL-1 screening levels applied within the plume assessment, particularly in the context of a transient short-duration event with rapid atmospheric dispersion and no sustained exposure pathway.

At post consent, an updated Plume Study will be commissioned using updated BESS data and infrastructure layouts to check that in the final design the exposure limits within the surrounding fields are no worse than those included within the current initial Plume Modelling Outputs. The Emergency Response Plan produced at the detailed design stage will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider and additional internal EDF testing. The Applicant will engage with Preston Farms/TCS Biosciences once the final plume analysis study has been conducted to ensure that emergency procedures for all credible hazards and risks at their receptor

			locations are included in the ERP i.e. the BESS area weather station will identify the prevailing wind direction, air emission monitoring at site boundaries will establish required ERP protocols, etc.
5.5.11	14 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary omits Preston Farm's staff as occupational receptors, despite their prolonged outdoor exposure in the primary downwind direction from the BESS, representing a gap in the occupational health risk assessment.	The proposed BESS does not represent a continuously emitting industrial air pollution source during normal operation and therefore does not give rise to a routine occupational exposure pathway for adjacent land users. The plume assessment relates specifically to a rare accidental fire scenario and accordingly uses emergency exposure criteria (AEGLs) intended for short-duration accidental releases rather than prolonged occupational exposure limits. Further, as explained in the row above (5.5.9), the use of a receptor grid has allowed predictions at all downwind areas and all the TCS Biosciences/Preston Farms fields. With the proposed 50m BESS unit setback in the **Design Commitments [EN010158/APP/5.9.5]** document, this will be below all HF AEGL1 thresholds throughout areas where Preston Farm staff would be operating At detailed design stage the plume study will be reassessed and the specific BESS technology parameters updated as necessary within the study. At this stage, the Applicant will work with Preston Farms and TCS Biosciences to also establish where their workers are likely to be situated so these receptors can be analysed for a potential thermal runaway event to provide further reassurance to staff that the risk remains low. The Applicant maintains that the assessment in the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** is robust and appropriate. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [EN010158/APP/7.9.4]** pre-construction requirements (Section 7). The Emergency Response Plan (ERP) developed at the detailed design stage will leverage results of the plume study to develop alert protocols to ensure TCS Biosciences/Preston Farms staff would be quickly informed if a BESS failure event occurred.
5.5.12	14 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that although the BESS Plume Assessment Summary recognises a north-easterly plume as the most likely outcome of a BESS incident, it has modelled only a distant residential receptor at 0.9km and provided no plume concentration data for closer operational areas of Preston Farms such as grazing land, barns and outdoor working zones within 400–700 m, where concentrations would necessarily be higher.	The comment regarding wind direction and the review of potential contaminant levels within the surrounding Preston fields has been addressed in **Ref. 5.5.9** above.
5.5.13	14 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary applies only human health thresholds (AEGL/SLOT/SLOD and air quality standards) and omits any equine or ovine toxicological criteria, meaning	The scope of the Applicant's study is the UKHSA criteria, LAQM TG22 and NFCC guidance for receptors. The UKHSA is a Statutory Consultee for the Proposed Development and has declared within the SOCG **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2]**

		exposures deemed “not significant” for people could still cause respiratory harm, panic and injury in livestock, contaminate donor blood, and necessitate veterinary intervention and suspension of collection, rendering the assessment not fit for purpose without a bespoke veterinary-informed study.	**[REP1-022]** that the Applicant’s BESS fire emission risk analysis and consequence modelling “*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.*” It is acknowledged that the donor animals have sensitivities. The limits used within the current study are normal practice for Plume studies and set out within the relevant guidance documents. The Applicant has further investigated emission levels in the fields closest to the BESS where horses from TCS Biosciences/Preston Farms could be located in response to Written Representation comments. The investigated levels reported are below the AEGL’s and the UK Air Quality Objectives (AQO). These limits involve trace emission levels which are set considering vulnerable babies and people with significant respiratory issues and there is no alternative evidence to suggest that these values can’t also apply to an assessment of potential effects on livestock suggest no significant risk to livestock i.e. below 0.2 ppm. Air quality emission monitoring equipment for emergency responders used to detect HF is typically set with a threshold of 0.2 ppm to ensure appropriate response measures are taken - emissions below this level can be considered to have no significant impact on any receptor. Published HF toxicology studies, including animal studies considered in the derivation of human emergency exposure criteria, provide additional supporting context for the assessment methodology adopted. Whilst AEGLs are human-health emergency planning thresholds, the available toxicological evidence indicates that animal exposure studies associated with limited or no significant effects were generally undertaken at concentrations materially higher than the conservative AEGL-1 screening levels applied within the plume assessment, particularly in the context of a transient short-duration event with rapid atmospheric dispersion and no sustained exposure pathway. Exposure Guideline Levels for Selected Airborne Chemicals: Volume 8, National Research Council (US) Committee on Acute Exposure Guideline Levels. Accordingly, the Applicant considers that the assessment of potential effects on livestock from the BESS plume is robust and appropriate.
5.5.14	15 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the addendum to the BESS Plume Assessment Summary shows hydrogen fluoride levels at the closest modelled footpath receptor (FR14 at 50m) approaching the human AEGL-1 threshold, yet it has not modelled plume concentrations at the even closer 10–50m distances where Preston Farms livestock graze adjacent to the BESS, meaning the assessment omits the most relevant exposure scenario for the most sensitive receptor.	The review of contaminant levels within the surrounding Preston Farms fields has been addressed in **Ref. 5.5.8** above.
5.5.15	15 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary expressly excludes smoke and fire-generated particulates and, while the addendum models PM10/PM2.5 for human receptors, it still does not assess combustion particulate impacts on donor animals grazing within 10–	The scope of the Applicant’s study is based on the UKHSA criteria and NFCC guidance for receptors. Particulate Matter results for PM2.5 and PM10 have both been reviewed and they are negligible at all residential receptors. Accordingly, the Applicant maintains that the plume assessment is robust and appropriate.

		200m, creating a material assessment gap given the potential for acute respiratory distress, panic, blood contamination indicators, and need for veterinary intervention during a BESS fire.	At the closest footpath receptor, the annual and 24-hour objectives against PM2.5 and PM10 levels don't apply. However, the results presented in the Executive Summary of the Plume Assessment Addendum, demonstrate that all impacts during BESS incidents are below the annual Air Quality Standards (AQS) at all nearby receptors including a footpath 50m away from the BESS. Due to the proposed setback of BESS units at least 50m from adjacent grazing fields added to the **Design Commitments [EN010158/APP/5.9.5]** at Deadline 3, no animals could graze within 10 m of the BESS and the contaminant levels in the event of a fire would be below AQS limits in the grazing fields.
5.5.16	15 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the outline BSMP inappropriately defers the detailed BESS plume assessment to the post-consent stage and undertakes assessment on an "example design". Further comment that this approach is not acceptable due to the unique sensitivity of the receptor and the nationally significant consequences of error. Further comment requesting an assessment of panel fire risk.	The Applicant has followed NFCC guidance and commissioned the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements and published incident criteria. The BESS and battery system specifications used for the study is reflective of current commercially available BESS designs, and the purpose of the Plume Assessment Study submitted is to demonstrate that the selected BESS site is located with safe buffer zones to sensitive receptors to ensure no significant off-site emission impacts in credible BESS failure scenarios. The **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. The Applicant has further investigated emission levels in the fields closest to the BESS where horses from the Preston farms could be located in response to Written Representation comments. The levels reported are highly unlikely to be above AEGL-1 (1ppm) and EAL (0.2ppm) thresholds (see response to comment 5.5.9 of this document). These limits are set considering vulnerable babies and people with significant respiratory issues and there is no alternative evidence to suggest that these values can't also apply to an assessment of potential effects on livestock suggest no significant risk to livestock i.e. below 0.2 ppm. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and • Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. The UKHSA is a Statutory Consultee for the Proposed Development and has declared that the Applicant's BESS fire emission risk analysis and consequence modelling *"provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low."*

As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline BSMP [EN010158/APP/7.9.4]** pre-construction requirements (Section 7).

Paragraph 5.2.10 of the **Outline BSMP [EN010158/APP/7.9.4]** stipulates *"Another plume assessment would be completed once the battery modules for the Proposed Development have been selected at Detailed Design to demonstrate that the risk of thermal runaway and impacts from such thermal runaway will be no worse than as assessed in the plume assessment submitted with the Application. This informs the design prior to construction and ensure specific battery chemistries are considered along with all appropriate safety mitigation measures being put in place."*

The scope of the final plume assessment is defined in paragraph 7.1.2 of the **Outline BSMP [EN010158/APP/7.9.4]** *"As recommended in NFCC guidelines (2024) a detailed BESS system and site-specific Plume Analysis and Atmospheric Dispersion will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius using the Rosefield confirmed BESS system supplier data. When the battery system of a BESS is fully consumed (burnt out), toxic gas, particulate matter and other relevant products of combustion emissions with the potential to impact sensitive receptors will be assessed against relevant public health/toxicological guideline values, such as UK Air Quality Objectives, WHO Air Quality Guidelines, or AEGLs. The plume study will also include a visibility impact assessment on any transport links within a 1 km radius of the BESS area. This detailed Plume Study will be in addition to the early plume studies that have been carried out for the Proposed Development. **BESS Plume Assessment Summary [EN010158/APP/7.13.2]**."*

Accordingly, the Applicant considers that it is entirely appropriate and standard practice to conduct a further plume assessment post-detailed design.

Based on a small-scale nine solar panel fire study undertaken as part of the Cotham solar project, which was based on selected research and testing of solar panel fires undertaken by BMUKU (Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit), the impacts, even at 10m from the panels, are low in comparison to the chosen workplace exposure limits. While this assessment is not specific to the Rosefield site, based on the impacts, it is unlikely that a site-specific air quality assessment utilising similar assumptions on emissions would demonstrate significant impacts at relevant sensitive receptors.

In 2025, there were more than 1600 farm buildings destroyed by fire and more than 66,000 acres of grassland / arable land destroyed by fire.

In 2025 there was 1 x BESS fire at Cirencester - 2 x BESS destroyed - this was an old GE RSU BESS integrating LG JH4 pouch cells in air cooled modules - no deflagration vents (doors used for venting) - not UL 9540, UL 9540A, or NFPA 855 compliant - aerosol suppression integrated - 3 metre gaps between BESS - no LSFT to validate spacing

In 2024, there were 17 PV panel fires on solar farms vs 97 on residential buildings vs 37 on Commercial and Industrial buildings.

The livestock on Preston Farms are far more likely to be impacted by a farm or wildfire scenario, not BESS failure.

5.5.17	15 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the Emergency Response Plan is inadequate for the Preston Farms receptor context, as it relies on measures applicable only to human populations, provides no protocols for livestock evacuation, veterinary triage, or suspension of donor blood collection, and has been developed without engagement with Preston Farms or TCS Biosciences despite the BESS being immediately adjacent to their holding.	The Emergency Response Plan produced at the detailed design stage will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider and additional internal EDF testing. The Applicant will engage with Preston Farms/TCS Biosciences once the final plume analysis study has been conducted based on the detailed design, to ensure that emergency procedures for all credible hazards and risks at their receptor locations are included in the ERP i.e. the BESS area weather station will identify the prevailing wind direction, air emission monitoring at site boundaries will establish required ERP protocols, etc. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. The scope of the final plume assessment which is defined in section 7.1.2 of the **Outline BSMP [EN010158/APP/7.9.4]** will include receptor locations of fields which are likely to contain horses or farm workers, to provide further reassurance to TCS Biosciences that BESS fire emissions risk to workers and horses is low. The Applicant has further investigated emission levels in the fields closest to the BESS where horses from the Preston Farms could be located in response to Written Representation comments. The levels reported are highly unlikely to be above AEGL-1 (1ppm) and EAL (0.2ppm) thresholds (see response to **Ref. 5.5.9** in this document). These limits are set considering vulnerable people and people with significant respiratory issues and there is no alternative evidence to suggest that these values can't also apply to an assessment of potential effects on livestock suggest no significant risk to livestock i.e. below 0.2 ppm.
5.5.18	16 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the revised LOPA between the submitted and revised BESS Plume Assessment Summary reduces the claimed event frequency by a factor of around 17 without any narrative justification, despite identical consequence modelling, leaving the substantial change unexplained and unjustified.	The first initial LOPA analysis that was included in the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** was refined at version 2 as errors were found within the original calculation and further barriers were added to the LOPA based on the Applicant's understanding of the concept design battery technology and minimum qualification and procurement checks that would be carried out prior to selecting a suitable and good quality BESS supplier. The LOPA was updated and the Applicant believes that this updated assessment remains generally conservative. It isn't expected that the order of likelihood of failure will not vary significantly when the final LOPA is carried out, which will be at preconstruction stage once the final battery chemistry and specification has been confirmed.
5.5.19	16 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary revised LOPA contains a physically impossible Safety Instrumented Function Probability of Failure on Demand value of 9.5, representing a fundamental arithmetic error that invalidates subsequent calculations and remains unexplained.	The Safety Instrumented Function (SIF) probability of failure on demand (PFD) value isn't used in the calculation and should have been deleted from the spreadsheet - it has been left on the page in error. Each barrier has been assigned its own probability of failure on demand separately therefore the SIF value is redundant in the spreadsheet and hasn't been included in the final calculation of event likelihood. It will be removed from the next issue and has been updated at Deadline 3 in **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**.

5.5.20	17 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary LOPA inappropriately assigns a zero B0 qualification factor to full module failure, effectively excluding the lithium-ion BESS failure scenario from the risk analysis without justification, despite this being precisely the event of greatest regulatory concern.	The initiating cause T10 has been assigned a qualification factor of zero. This is due to the qualification process for the BESS system complying with UL 1973 and BS EN IEC 62919 testing standards which is considered as mostly effective - therefore B0 = 0. The Applicant wouldn't qualify a system that wasn't given this rating therefore module failure would be extremely unlikely to occur hence a probability of 0 was included. The Applicant has checked what a higher probability value of 0.1 would do to the LOPA outcome if this was updated within the calculation to allow for some probability of full module failure. With a B0 value of 0.1 this increases the probability of an event happening from once every 5804 years to once every 3938 years so the order of magnitude for LOPA is still similar. The Applicant will review this qualification factor at the detailed design stage to determine an updated LOPA once the BESS system has been chosen and the final details of the BESS system can be fed into the LOPA analysis. However, the Applicant maintains that it is appropriate, at this stage, to retain the B0 qualification factor as 0. Section 6.1 of the **Outline BSMP [EN010158/APP/7.9.4]** stipulates: The detailed design phase would consider the lifecycle of the battery from cradle to grave. A large number of studies would be undertaken, with a focus on fire risk including, but not limited to, studies in line with risk analysis and management tools such as Hazard and Operability Analysis and Hazard Identification (HAZOP/ HAZID), failure Mode and Effects Analysis (FMEA), Bowtie risk assessments and Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) to inform the overall design solution. An agile method is applied during the engineering design phase for fire safety analysis. The analyses are updated based on any changes of the project context and during the design process from the selected contractors in case of any deviation from the initial set of technical requirements. These would be finalised before construction commences.
5.5.21	17 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary applies Independent Protection Layer credit values of 0.1 and that these are applied repeatedly in the LOPA without reference to recognised standards or evidence, resulting in stacked risk reductions that are overly optimistic by industry benchmarks and cannot be independently verified from the information provided.	At post-consent stage the LOPA will be re-calculated based on the updated BESS technology information at detailed design stage which is secured in the **Outline BSMP [EN010158/APP/7.9.4]** and by Requirement 6 of the **Draft DCO [EN010158/APP/3.1.5]**. At this stage of the design the LOPA is indicative and estimated. Each barrier system is an independent event; therefore, the probability ratings can be stacked up against one another in the LOPA analysis calculation. The current values have been based on engineering judgement and test estimates to provide an order of magnitude of failure. The values assigned are the Applicant's assessments based on the credible layers of protection in accordance with documentation such as that produced by Det Norske Veritas group (DNV), specifically for the assessment of BESS safety. The probability of failure outcome from the LOPA assessment of 1 in 5804 years is in the same order of magnitude as other similar DCO projects. Namely Springwell DCO which had an estimated frequency of once every 7700 years and received consent from the Planning Inspectorate on 8 April 2026.
5.5.22	17 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the BESS Plume Assessment Summary LOPA presents irreconcilable frequency figures that ranging from once every 5,000 years to once every 9 million years. Further comment suggesting that there is confusion between targets and calculated outputs, with	The gas released every 4737 years is a calculated value prior to the additional barrier probabilities being considered namely B6, B12, B16 and B2 – therefore this value is not relevant to the current conclusions. The 1 in 5804-year probability value is the final output of the LOPA considering the number of enclosures that the Applicant has estimated in the current indicative design of the Proposed Development. The number quoted in the main text was a rounded number that described the risk of an event as less than '1 in 5000' years, instead of saying 1 in

		three conflicting values given for the same parameter and no explanation provided.	5804 years. Therefore, both the text as quoted in the response comments and the 1 in 5804 years are correct and based on the updated LOPA.
5.5.23	17 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the party considers the LOPA in the BESS Plume Assessment Summary to be an inadequate basis for concluding the BESS poses an acceptable risk, and states that the LOPA should reference a recognised methodology standard, justify IPL credits with cited evidence, presents clear and consistent arithmetic, explain any aggregation across container groups, and provide a physically meaningful SIF PFD value. Further comment that neither plume assessment meets these standards.	The Applicant considers that the LOPA is adequate and appropriate for this stage of the Proposed Development for the reasons listed above. The LOPA assessment gives a reasonable order of magnitude for a potential thermal runaway event and the UKHSA has determined that the BESS plume assessment and risk modelling "*provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low.*" and the LOPA will be updated pre-construction using the final BESS system information.
5.5.24	18 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that fire risk from the solar PV array has not been assessed anywhere in the DCO Application, despite being a known and documented hazard capable of generating toxic smoke and particulates over a large area immediately adjacent to Preston Farms, with no consideration of the resulting risks to livestock or workers.	Based on a small scale nine solar panel fire study undertaken as part of the Cottam solar project[5], which was based on selected research and testing of solar panel fires undertaken by BMUKU (Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit), the impacts of solar panel fire, even at 10m from the panels, are low in comparison to the chosen workplace exposure limits. While this assessment is not specific to the Order Limits, based on the impacts, it is unlikely that a site-specific air quality assessment utilising similar assumptions on emissions would demonstrate significant impacts at relevant sensitive receptors. Furthermore, information within this BMUKU report did not detect any hydrogen fluoride or any other pollutants considered in the main plume assessment (with the exception of small amounts of CO); therefore, based on this data, a simultaneous solar panel and BESS fire assessment conclusion would not differ to individual assessments conclusions. For similar Solar projects such as West Burton Solar project, there was no additional requirement for a solar panel fire risk assessment in respect of the Scheme. Therefore, this aligns with the Proposed Development and the BESS Plume Assessment and LOPA assessment that have been provided. The exception to the above is particulate matter, where the assessment does demonstrate the potential for impacts up to 200m from the site; however, as the emission rate used in the study is not specific to solar panels, the uncertainty within this prediction is high. Based on the risk of a solar panel fire and the uncertainty in any predictions, it is judged that focus should be on reducing the risk, as it would likely be proportional to another fire event. In 2025, there were more than 1600 farm buildings destroyed by fire and more than 66,000 acres of grassland / arable land destroyed by fire. In 2025 there was 1 x BESS fire at Cirencester - 2 x BESS destroyed - this was an old GE RSU BESS integrating LG JH4 pouch cells in air cooled modules - no deflagration vents (doors used for venting) - not UL 9540, UL 9540A, or NFPA 855 compliant - aerosol suppression integrated - 3 metre gaps between BESS - no LSFT to validate spacing. In 2024, there were 17 PV panel fires on solar farms vs 97 on residential buildings vs 37 on Commercial and Industrial buildings.

[5] EN010133-001077-C8.4.17.1 Updated Air Quality Impact Assessment of a Solar Panel Fire Incident.pdf

			This shows that the livestock across Preston's farms holdings are far more likely to be impacted by a farm or wildfire scenario, not BESS failure.
5.5.25	18 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the Applicant has not responded to Preston Farms' explicitly raised concerns regarding fire risk, emergency response, insurance and business continuity, with **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** failing to address these substantive issues despite the national significance of the affected operation.	The Applicant has responded to the **Preston Farms Relevant Representation [RR-223]** and **Relevant Representation [RR-266]** ("the Relevant Representations") as part of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. Within these Relevant Representations, fire risk, emergency response and the insurance implications and business continuity were not raised, therefore these items weren't responded to. However, the Applicant has now responded to other comments from Preston Farms Ltd relating to fire risk and emergency response within this document, please see responses to **Refs. 5.5.8**, **5.5.9**, and **5.5.16** in this document. For responses relating to insurance implications and business continuity please refer to **Ref. 5.5.27** in this document.
5.5.26	18 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the Applicant has never modelled the credible worst-case scenario of a combined solar PV array and BESS fire, despite their proximity and prevailing south-westerly winds directing emissions toward Preston Farms, with potentially serious consequences for the donor animal herd from combined toxic gas and particulate exposure.	The Applicant does not consider a combined large-scale simultaneous solar PV array and BESS fire scenario to represent a credible propagation case based on the proposed site design, technology separation distances and fire mitigation strategy. The BESS area incorporates suitable spacing, dedicated buffer zones and finishes intended to prevent fire spread between technology areas and adjacent infrastructure. In addition, modern utility-scale BESS systems are required to undergo Large Scale Fire Testing (LSFT) in accordance with NFPA 855 (2026), with the detailed design stage required to demonstrate that thermal runaway propagation and external fire spread risks are appropriately mitigated. Whilst localised independent fire events within either the PV array or BESS area remain theoretically possible, the Applicant has not identified a credible scenario whereby fire would propagate between technology areas simultaneously to create a combined large-scale event.
5.5.27	18 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the ES, outline BSMP and BESS Plume Assessment Summary fail to assess the insurance, regulatory and business-continuity consequences of a BESS or solar PV fire adjacent to a Home Office-licensed establishment, including suspension of blood collection, veterinary and toxicological clearance, animal testing, supply-chain notifications and Home Office reporting.	The Applicant's Third Party Liability policy (TPL) ensures that a robust indemnity is available for any damage caused to third party property or injury to persons arising out of the Proposed Development. Escape of environmental pollutants from the BESS (and the cleanup required) would also be covered by the TPL policy. The Applicant would also insure the works/assets against damage arising during construction and operation. This means that remedial works to correct any damaged portion of third-party property are suitably funded and can be carried out with all dispatch, minimising any periods when damage to the assets exists.
5.5.28	18 and 19 (Expert Review of Rosefield Solar Farm Safety Impact Assessment)	Comment noting that the party's review concludes the Applicant's environmental and safety case is fundamentally flawed as it: excludes the most proximate downwind receptors; relies on human thresholds and mathematically invalid modelling. Further comment requesting that the ExA require that the Applicant prepare a supplementary veterinary-informed plume assessment, assess emergency response measures in the context of livestock receptors, and submit a fully documented independently reviewed	Please refer to **Refs. 5.5.9, 5.5.15, 5.5.16, 5.5.17, 5.5.18, 5.5.19, 5.5.20 & 5.5.21** which address the party's concerns including, downwind receptors, AEGL threshold limits, future Emergency Response Plan and LOPA comments. Due to the **Draft Statement of Common Ground with UKHSA [EN010158/APP/5.12.2] [REP1-022]** that agrees that the assessment as carried out provides a logical approach and assesses a worst-case scenario and the agreement within the **Statement of Common Ground – Buckinghamshire and Milton Keynes Fire Authority [EN010158/APP/5.11.2] [REP2-012]** that the design of the system will be in line with NFCC guidance and NFPA 855 and the commitment for a final version of the relevant documents (secured through the DCO), the Applicant considers that the assessment of potential effects from the BESS plume can be confidently relied on when considering the DCO

		LOPA before any consent can be safely justified for the BESS in its proposed location.	Application and should not prevent a decision to grant development consent for the Proposed Development.
5.5.29	20 to 21 (Annex 1 – Equine Veterinary & Reproduction)	Comment noting that moving livestock through the proposed corridor in Field E23 has the potential to confine large, loosely moved herds of horses through a narrow corridor which would increase social stress, aggression, and collision risks due to the fact that horses need for space when moving at speed. Further comment noting that the party's horses are less tractable and more stress-responsive than typical riding horses, such that corridor confinement creates a heightened risk of panic, serious injury (including possible fatal limb and joint injuries), and unacceptable welfare impacts.	The Applicant notes this comment and points to **Appendix 1** to the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** to provide a single source of responses to the matters and issues raised by Preston Farms Ltd and TCS Biosciences Ltd. Please also see **Ref. 5.5.6** which covers a similar issue. This Appendix sets out the Applicant's current understanding of the Preston Farms operation, the potential impact of the Proposed Development on Preston Farms, and steps taken to mitigate them. The Applicant considers that the mitigation measures set out in the Appendix allow the continued movement of livestock through Field E23 whilst also allowing the Site to be used for Solar PV development and that the presence of solar in Field E23 would not impact on Preston Farms use of adjoining land. The Applicant looks forward to any further information that the Preston Farms Ltd and TCS Biosciences Ltd can provide to further the Applicant's understanding of the Preston Farms Ltd and TCS Biosciences Ltd operation, specifically the specific route(s) that will be required across Field E23 from adjoining grazing fields that will be in use at the time of operation.
5.5.30	22 (Annex 2 – Brain Partners Equine Vets Ltd)	Comment noting that the party keeps 3,500 sheep and 400 horses under a strict licence to produce blood products for the NHS. Further comment noting that the 400 horses' welfare is paramount to the production of the blood products produced. Further comment noting that the proposed corridor in Field E23 is of particular concern as the tunnelling effect could increase negative interactions between horses, adding to stress and the possibility of injuries.	The Applicant points to the response provided above under **Ref. 5.5.27** and **Ref. 13.2.10**, **Ref 13.2.14**, **Ref 5.5.6** and Section 6 of Appendix 1 to **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.
5.5.31	23 (Annex 2 – Brain Partners Equine Vets Ltd)	Comment noting that horses are far more sensitive to vibration, light and sound that humans, meaning flight responses and the sustained use of heavy machinery will be highly disruptive. Further comment that stress events have resulted in haematological variation in the bloods taken from the horses and that the position that the horses would be brought indoors during the construction phase could induce stress. Further comment noting concern with the biosecurity measures that contractors would maintain during the construction of the Proposed Development and further comment seeking confirmation that strict biosecurity measures (such as washing down vehicles, foot dipping etc.) are adhered to.	The Applicant points to the response provided above under **Ref. 5.5.27**. The Applicant adds that the **Outline CEMP [EN010158/APP/7.2.4]**, **Outline OEMP [EN010158/APP/7.3.4]** and **Outline DEMP [EN010158/APP/7.4.4]** all contain measures to mitigate effects of the internal access track into Parcel 3 (secured by Requirements 11, 12 and 18 of the **Draft DCO [EN010158/APP/3.1.5]**), including but not limited to low speed limits, advance notice of activities and biosecurity measures. These would match the current biosecurity measures of TCS Biosciences and Preston Farms.

Table 5.6: Miles Roberts [REP2-122]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.6.1	1 (ExA Question 1.15.15 - Residential Visual Amenity Assessment (RVAA) - conclusions No properties considered in the RVAA [APP-114] are deemed by the applicant to meet the residential visual amenity threshold, although significant effects in Environmental Impact Assessment (EIA) terms are identified for several properties in year 1 of operation. By year 10, significant effects are only identified to remain at Sion Hill Farm and Bernwood Farm as they would have views from elevated rooms. For the other properties, the magnitude would reduce due to the establishment of mitigation Provide further justification for the conclusion that the residential visual amenity threshold is not met in instances when significant effects are identified. To what extent is the conclusion on the threshold not being met dependant on the successful establishment of mitigation planting? ExA Question 1.15.16 - RVAA – property visits Table A10.5.1 in the RVAA [APP-114] identifies which properties have been visited by the applicant and where access was not obtained. In instances where access was not obtained, the applicant provides comments that the outlook was achieved from alternative locations such as a neighbouring property. Provide further commentary and analysis to support the applicant's position that the alternative outlooks provide an accurate basis upon which to draw conclusions.)	Response noting that the Residential Visual Amenity Assessment notes there are zero houses in [redacted], Botolph Claydon listed as being approached to view, not even the ones on the south side that are directly impacted by solar. Further comment noting that it is assumed the Applicant felt it was obvious they would be impacted and held back for their second submission that they would revise the boundary for the PV panels back 50m thus mitigating any concerns. Further comment noting interest in that all the houses on Weir Lane were discounted for LVIA as they are more than 200m from any development boundary. Further comment questioning whether there are laws that cover a wider visual impact.	The Applicant undertook a review of potential RVAA effects for properties along Weir Lane in Botolph Claydon based on their proximity to the 200m buffer from solar PV modules as illustrated in **ES Volume 3, Figure 10.13: Residential Property Location Plan [EN010158/APP/6.3.2] [AS-031]**. As set out in Table A10.5.1 in **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** five properties on Weir Lane were contacted with positive responses from three, which were viewed internally and externally as follows: • Bernwood Farm, Weir Lane, Botolph Claydon, MK18 2NF • 33 Weir Lane, Botolph Claydon, MK18 2NF • Corner House, Weir Lane, Botolph Claydon, MK18 2NF Of these three properties, only Bernwood Farm was judged to have potential views of the Proposed Development that warranted further assessment in terms of establishing RVAA thresholds. It was established that, for the four properties excluded from further assessment, all were further than 200m from the Proposed Development with very limited or no views of the solar PV modules. As noted in the response to Q1.15.14 in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**, Landscape Institute Technical Guidance Note 2/19 states that Residential Visual Amenity requires a judgement of RVAA threshold for only those properties with the highest magnitude of effect as a result of the Proposed Development. Accordingly, the Applicant considers that the RVAA is robust and appropriate.

Table 5.7: Waddesdon Surgery [REP2-109]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.7.1	1 (ExA Question 1.13.1 - Health Effects Report Provide a view on the Health Effects Report at annex A of the Health and Wellbeing Summary Statement [REP1-056] submitted at deadline 1.)	Response stating that the Health and Wellbeing Summary Report is inaccurate and insufficiently tailored to the predominantly older, rural and higher-need patient population, is based on non-representative ward data, and therefore understates the local heightened sensitivities arising from frailty, comorbidities, access barriers and reliance on local primary care services. Further comment noting that the Proposed Development poses particular risks to a predominantly rural and housebound patient population, with construction traffic, HGV movements and longer-term urbanisation likely to disrupt emergency and community healthcare access, harm mental wellbeing, and adversely affect vulnerable residents, warranting a comprehensive, locally specific Health Impact Assessment and full consultation with healthcare providers.	The Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) draws conclusions based on a consideration of the baseline using national statistics and public health data which is only available at a ward level in this location. 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. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** was updated accordingly and submitted at Deadline 2 to account for helpful information provided by Waddesdon Surgery and to 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 has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3] [REP2-065].** The traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.

Table 5.8: Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) [REP2-101]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.8.1	1 (ExA Question Q1.7.1 - General - review of deadline 1 documents Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.)	Response stating that BBOWT's concerns remain unaddressed, as the Applicant's responses largely dismiss previously raised issues, repeat insufficient arguments from the DCO Application, and fail to meaningfully engage with or resolve the potential biodiversity impacts of the proposals.	The Applicant respectfully disagrees that comments raised previously by BBOWT have been dismissed and have not been addressed. The Applicant has provided robust responses to BBOWT's concerns in **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.
5.8.2	1 (ExA Question Q1.7.10 - Surveys of Bechstein's bats Provide a view on Natural England's position regarding the survey work for Bechstein's bats [RR-203, AS-038, REP1-124] – to what extent do you agree or disagree with this and why?)	Response stating that: BBOWT and the North Bucks Bat Group consider the solar farm fundamentally inappropriate due to unacceptable impacts on Bechstein's bats; the Applicant's failing to remove Fields B6 to B8 within the core sustenance zone is criticised; and BBOWT agree with Natural England in that further intrusive surveys are unnecessary. Further comment noting that BBOWT instead supports an avoidance approach through removal of panels and continued cattle-grazed management with enhancements.	As detailed within **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**, the Applicant is not intending to remove Solar PV development from these fields. The Applicant is aware that fields located between Sheephouse Wood SSSI and Shrubs Wood form important areas of the Bechstein's bat core sustenance zone, and these woods will remain well-connected with strong linear features between them all. However, the extent to which these pasture areas are of greater value than other pasture areas, based on the quality of the habitat as well as their location, is questionable, with a full detailed response provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], RR-203 page 209**. The Applicant is discussing and will continue to discuss this matter with Natural England (who have also raised this issue), to seek an agreement on this matter.
5.8.3	1 and 2 (ExA Question Q1.7.19 - Mitigation - woodland buffer distance In your relevant representation [RR-020] and written representation [REP1-125] you suggest that a minimum buffer distance of 50 metres is required to designated woodland. Whilst noting the study referred to in your relevant representation, this does not represent guidance or a legislative	Response stating that while a 30m woodland buffer exceeds minimum statutory guidance, it falls short of national and local policy expectations and emerging scientific evidence, with BBOWT concluding that a minimum 50m buffer is necessary to protect ancient woodland function and bat populations (particularly Bechstein's). Further comment that solar development so close to woodland risks physical stress and degradation of key bat habitat.	Please see the Applicant's response detailed within **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086], Ref 2.1.43 and 2.1.44.** Please also see response above to **Ref 5.3.1**.

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	requirement. The applicant has based the minimum buffer distance on guidance from Natural England and the Forestry Commission – why is this not deemed sufficient?)		
5.8.4	1 and 2 (ExA Question 1.7.24 Natural England, Buckinghamshire Council and BBOWT: do you consider that you should be consulted on, and approve the details of any proposed monitoring of bat activity during the operation of the proposed development, including any monitoring reports and adaptive mitigation measures – justify your answer)	Response stating that BBOWT considers it should be an consultee on bat monitoring, given its expertise, established advisory role on projects such as HS2 and Bernwood bat licensing, and its ability to hold the Applicant accountable and ensure monitoring and mitigation deliver meaningful benefits for nature.	As outlined in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] (Q1.7.22 page 32)**, it is envisaged that the bat monitoring report would be reviewed by the stakeholders involved in the preparation of the monitoring strategy which is set-out within and secured by the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** and by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**; namely Natural England, BBOWT and Buckinghamshire Council. The Applicant is prepared to consult BBOWT on the bat monitoring strategy.

Table 5.9: Claydons Solar Action Group [REP2-102]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.9.1	2 and 3 (ExA Question Q1.1.6 The applicant and all interested parties are invited to make comments or representations about the Solar Roadmap 2025 and its applicability and implications for the proposed development.)	Response noting a pipeline of solar NSIPs which have been granted permission recently concluding that the target for ground-mounted solar appears likely to be easily met. Further comment noting the Gate 1/Gate 2 position on the Proposed Development and, thus, concluding that the Roadmap does not support the Applicant's claim that there is a need for the Proposed Development.	The Applicant disagrees with the Action Group. In 'Planning for New Energy Infrastructure', Government's response to its consultation on the newly designated NPSs which is available at https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf, it is stated that: *"Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals"* and that the Government *"will continue to ensure that language used across government publications does not inadvertently constrain ambitious deployment of clean energy technologies."* This is important because, and as described in Section 3.9 of the **Statement of Need [EN010158/APP/5.6] [APP-036]**, the Clean Power Action Plan explains that *"the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained."* Put another way, the Government has a target to achieve a clean power system by 2030 (see Paragraph 3.9.7 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** and to keep it clean thereafter. It has established a framework to prioritise projects for grid connection which, if all are delivered in full and on time, is expected to achieve that aim. However, because of the many factors outside of its control, the Government has 'reserved the right' at a future date to revise its prioritisation, by way of increasing or decreasing the technology specific capacity ranges based on more up to date information, including progress in delivery and pipeline-building of clean power technologies to meet its Clean Power target. For this reason, the revised NPS EN-1 (2025) states at Paragraph 3.2.6 that *"It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs."* The policy position is further clarified in NPS EN-1 (at paragraphs 3.2.6 to 3.2.8 of the 2023 versions and at paragraphs 3.2.8 to 3.2.10 of the 2025 versions) that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established. The Applicant has been informed that the solar component of the Proposed Development has been prioritised as a Gate 2 Phase 2 scheme. In reference to the specific point raised by the Party in relation to Figure 2 of the Solar Roadmap 2025, the Applicant refers to paragraphs 3.9.13 and 3.10.5 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** which explains that upside in rooftop deployment is already considered as possible and in addition to the need for large scale solar schemes. In relation to the Gate 1 status of the BESS, which is being proposed as associated development to the main solar scheme, the Applicant notes that the BESS component of the Proposed Development will receive an Agreement to Vary its existing connection agreement to move it to a Gate 1 connection offer. The indicative connection date for such offers has not yet been confirmed but is expected to be confirmed in due course subject to NESO timelines. Further, upon receiving consent for the Proposed Development (if granted) the Applicant would re-submit the BESS component of the Proposed Development to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date).

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.9.2	5 to 13 (ExA Question Q1.7.1 Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA 006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them."	Taking this response in turn: 1) Response stating that the contents of table 2-24 of **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** presents bland repetition of the ES. Further comment noting that the Applicant's habitat mapping and BNG calculations are inaccurate, with overstated buffering claims. Further comment that a non-precautionary, inadequately evidenced approach to bats (Bechstein's) and birds fails to avoid or properly mitigate significant effects on protected species. 2) Further comment that until fundamental deficiencies in the EIA are remedied and the EIA can be regarded as providing an adequate assessment of the likely significant effects of the Proposed Development, there can be no confidence that cumulative effects (with particular regard for the displacement of ground-nesting and wintering bird species) have been properly assessed. Further comment stating that if the Applicant is not willing to make corrections, the Claydons Solar Action Group will add its own assessment weighting. 3) Further comment stating that the updated Wintering Bird Survey Report does not respond to the Claydons Solar Action Group's concerns but that they will await	1) The Applicant does not agree that a non-precautionary approach has been taken or that mitigation is inadequate and stands by its responses in the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**. A detailed response to comments about errors within the BNG calculations is given below under **Ref. 5.9.3**. See comments below regards mitigation for bats and bird species. 2) The Applicant disagrees with the statement. The EIA provides a thorough and robust assessment of the potential significant effects of the Proposed Development that can be confidently relied on in the cumulative assessment. The Applicant further notes that **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** has concluded that there are likely significant inter-project residual cumulative effects on biodiversity (farmland birds and foraging bats) for several projects including HS2, East West Rail, Grendon Prison, East Claydon Greener Grid Park, East Claydon BESS, Tuckey Farm, Fox Covert, Padbury Brook and Longbreach solar farms. However, following the implementation of mitigation outlined for these schemes, residual impacts are likely to remain for foraging bats only. 3) The Applicant has provided a robust response to Claydons Solar Action Group's concerns regarding wintering birds, detailed within **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**. 4) A response to comments relating to errors within the BNG calculations is given below under **Ref 5.9.3**. 5) **ES Volume 4, Appendix 7.14: Bat Preliminary Roost Assessment Report (2025) [EN010158/APP/6.4.2] [REP1-062],** is a stand-alone report, supporting **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] [REP2-035]** as a technical appendix, and is not an impact assessment. A full assessment regarding potential impacts that could occur to roosting bats is presented within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]**, with further information presented within **Bat Technical Study [EN010158/APP/8.5] [REP1-105]**, which provides justification that the mitigation measures proposed to prevent impacts occurring to roosting bats are sufficient. 6) For the avoidance of doubt, measurements for hedgerow buffers are taken from hedgerow centrelines, with the measurement being offset either side from centre line of hedgerows within the Order Limits (see **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]**, **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085], Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**, **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**). This is the most consistent and accurate way to measure buffers (as well as being realistic/achievable on-site). Measurements for woodland buffers have been taken from outer edge of existing woodland. 7) The structure of the monitoring strategy will follow that outlined in Ch9 of the Bat Mitigation Guidelines[6], in line with established industry standards; this requires meaningful, objective, specific tests of those objectives and remedial actions to be specified. Such remedial actions will depend on which tests are not being met; the reasons why those test(s) are not met; and whether or not those reasons are within the Applicant's control. This could include measures such as, but not limited to, refining habitat management to deliver more invertebrate biomass to increase prey availability. Such measures would be agreed in consultation with Natural

[6] Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

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		review of the Applicant response to ExA Question 1.7.2. 4) Comment stating that the updated Biodiversity Net Gain Assessment fails to resolve fundamental accuracy concerns, with the Applicant's metric calculation corroborating perceived substantive errors that will require further correction and a consequential update to the overarching Biodiversity Net Gain Assessment. 5) Comment that the amends to the Bat Preliminary Roost Assessment Report correct only minor errors in tree species identification and do not address concerns with bats. 6) Comment stating that updates to the outline LEMP have not clarified whether stand-offs/buffers are being measured from outer edge of existing woodland/hedge canopy or from the centre-line. 7) Comment stating that the outline LEMP's reliance on post-development bat monitoring does not follow the mitigation hierarchy or address concerns of impacts to Bechstein's and other bats. 8) Comment stating that the noise impacts of the Proposed Development may impact on bat roosts and that Claydons Solar Action Group consider there to be uncertainty due to the under-estimation of the widths of non-cropland field margin vegetation and incorrect habitat classifications. 9) Comment stating that whilst the Applicant accepts the importance of cattle-grazed pasture for bat foraging	England and the relevant planning authority. However, the Applicant re-iterates that the Proposed Development's design and mitigation has focused on protecting and enhancing the foraging and commuting habitat for Bechstein's bats such that, even if bats are discouraged (to a limited extent) from foraging by the placing of solar PV modules, the mitigation proposed provides alternate areas for foraging of a better quality/linked by substantial flightlines along hedgerows and woodlands that are protected with appropriate buffers wide enough to exceed the echolocation range of Bechstein's bat. 8) See response to **Ref. 5.9.3** below. 9) The Applicant rejects these comments and the various suggestions that its assessment of potential impacts to bats from loss of, or changes to, grazing are informed by "baseless conjecture". The **Bat Technical Study [EN010158/APP/8.5] [REP1-105] (see page 14-16)** presents a literature review that indicates there may be some benefits associated with sheep grazing under panels contributing to an overall greater insect biomass for foraging bats but has clearly not attempted to reach any conclusions other than this. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** has acknowledged the potential displacement of bats through the presence of solar panels and has reached a conclusion of a *potentially* significant residual effect on Bechstein's bat in recognition of this uncertainty. The commitment to sheep and cattle grazing is set out and secured within the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** and Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. The **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** was updated at Deadline 2 to provide a clear overview of the current grazing regime on-site, where grazing would be lost, where grazing would be retained and where new areas of grazing are proposed. This is illustrated within **Appendix 6** of **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]**(see **page 121**). As per that plan, the intention is to increase grazing, and some grazing is intended to continue in areas where there is current grazing. The greater increase is in areas which are much closer to Finemere Wood, where there are known maternity roosts, than to Sheephouse Wood/Decoypond Wood/Shrubs Wood where there are currently none identified. See **Bat Technical Study [EN010158/APP/8.5] [REP1-105] page 208 for roost distribution map** (note the roost shown in the corner of Sheephouse Wood was lost to natural causes a few years ago). Obviously not all roosts are known (and there will be many more), but this map covers multiple years of radio-tracking from 2011, demonstrating a consistent pattern of distribution. The proposed grazing will therefore reflect the distribution and concentration of roosts more closely than the current situation. 10) Limitations with regards acoustic detectors are acknowledged within **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** (see **page 23-26**), but **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** has used all survey information available and Natural England has agreed that the Applicant's data in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) and additional information from HS2 (see **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]**) is sufficient to inform the baseline and assessment. Finally, the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** (see **page 83-84**) sets out a draft bat monitoring strategy which will seek to address limitations of acoustic data and is secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. The **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** states that the final bat monitoring strategy will be developed in accordance with CIEEM's Bat Mitigation Guidelines (Chapter 9) and in consultation with Natural

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		(and acknowledges the lack of robust evidence equating sheep grazing to cattle grazing), the Bat Technical Study nevertheless relies on conjecture to justify displacement of cattle grazing by solar development within the Bechstein's home range. Comment that the Applicant provides no certainty that sheep grazing in relevant fields is deliverable or would be delivered. 10) Comment stating that the Bat Technical Study relies on flawed and constrained methodology, draws unjustifiably definitive conclusions (particularly in relation to Bechstein's use of Fields B6, B7 and B8) and that accepting conclusions based on a limited dataset and conjecture would equate to a departure from the precautionary principle given the national importance of this local bat population.	England and will likely be in partnership with organisations such as HS2 using monitoring techniques other than just acoustic detectors.
5.9.3	13 to 19 (ExA Question 1.7.2 Provide the completed Biodiversity Net Gain metric in Excel form as requested by CSAG [REP1-127]. For expediency this should also be provided directly to CSAG to review at the earliest opportunity and at deadline 2 to the examination.)	Response noting receipt of the full Biodiversity Metric. Further comment stating that there are clear and repeated errors in habitat mapping, including: cropland shown as continuous beneath hedgerows; widespread underestimation or omission of field boundary vegetation; and inaccurate field margin widths. Further comment providing examples to the above and wider comments made, with examples, of misclassification and omission of non-cropland habitats. Further comment that these omissions significantly detract from the baseline habitat score and risk overstating the benefits of the Proposed Development.	A response to all issues flagged by the CSAG are given below: **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** (see **page 10-14**) sets out all the assumptions that have been made with regards the BNG assessment. **Cropland edge habitat not being mapped** – We note the assertion from the CSAG, but the Applicant does not believe it has substantially underestimated the extent of existing arable margins, and does not envisage that there will be any significant change to the level of biodiversity gain indicated in **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]**. It is important to note that in any event the majority of these arable margins are retained in situ being incorporated into the buffers between woodlands, hedgerows and the solar PV panels. The Applicant will provide a detailed response at Deadline 4 justifying our position regards arable margins and if the Applicant considers it be required provide an updated BNG metric. **Trading rules** - It has also been noted by both the CSAG and Buckinghamshire Council that there is a specific technical paradox regarding Biodiversity Net Gain (BNG) trading rules when dealing with arable field margins and replacement of individual trees being lost from hedgerows. The Applicant understands the reason why these breaches of trading rules have been highlighted and will provide a justification at Deadline 4 that the trading errors highlighted are actually a paradox arising from the working of metric and do not reflect the real life situation and

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		Further comment flagging missing mature, non-woodland trees in the middle of fields (e.g. field 483) from the Biodiversity Metric. Further comment flagging concern that the BNG degradation rules may not have been applied for higher scoring habitats which appear to have been more extensive in 2020 versus when the surveys were undertaken.	why the Applicant believes strict adherence to the trading rules is **not** the most appropriate and transparent way to proceed in these two instances. Parcel 425 within the habitat base mapping was identified as cropland in the UKHab survey. The field notes state that it had been recently sprayed with herbicide (part of the conversion to arable) therefore the Applicant asserts that identification as cropland is the correct habitat type. **Non-cropland habitat missed in the middle of fields** – As outlined above, the Applicant will review the BNG baseline. to ensure no non-cropland habitat has been missed and present a revised version at deadline 4. **Missing individual trees from base mapping** – trees that are retained will be retained and protected with a suitable buffer as per **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044]**. As above, the Applicant will review the baseline mapping and aerial imagery to ensure all individual trees outside of hedgerows are mapped and that none have been missed this change will be issued at deadline 4. **Degradation rules** – The Applicant wholly disagrees and rejects the accusation that is has conducted any degradation activities. Currently the Applicant has no control over land management activities on-site. Baseline UKHab surveys were conducted between 2023 and 2025. There is no evidence of deliberate habitat degradation being carried out. Any changes in habitat type between 2020 and our surveys appear to be the result of normal farming operations. Any specific areas of concern can be reviewed in the next iteration of the BNG calculation. **Buffering of field boundaries** – the design for the Proposed Development includes buffers and stand-off distances from hedgerows and woodlands. The habitats proposed in these buffer zones is a mosaic of scrub, grassland and wild bird seed mix intended to benefit wildlife. The removal of crop from the fields will ultimately benefit wildlife and provide an enhanced buffer between solar and the hedgerows/woodlands on the periphery of fields. These buffers are in many places substantially larger than the existing field margins, e.g. within Fields B8, B9, B10, D28, D29.
5.9.4	19 to 22 (ExA Question 1.7.10 Surveys of Bechstein's bats Provide a view on Natural England's position regarding the survey work for Bechstein's bats [RR-203, AS-038, REP1-124] – to what extent do you agree or disagree with this and why?)	Response stating that Natural England's remarks confirm that acoustic surveys cannot reliably assess Bechstein's bats, reinforcing residual uncertainty over impacts. Further comment stating this underscores the need of the Proposed Development to prioritise avoidance (in line with the mitigation hierarchy) rather than rely on monitoring measures or novel, unproven mitigation. Further comment stating that both Natural England's submissions and the evidence cited demonstrate the Applicant's surveys are insufficiently robust and that important grazed fields within the Bechstein's home range have not been adequately assessed. Further comment that applying the	During a meeting (11 March 2025), Natural England officers agreed that additional survey effort for bats would not be useful and that the Applicant's data in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) and additional information from HS2 (see **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]**) is sufficient to inform the baseline. It has been agreed that activity surveys and static detector surveys within the western-most fields in Parcel 1 where access was previously not possible, will not be required, given that these fields are already known to be important to Bechstein's bats as they are located within the known core sustenance zone and home range of the Bernwood population of Bechstein's bat. The mitigation measures proposed to help reduce potential displacement effects from Solar PV development to foraging and commuting bats and ensure the connectivity between these woodlands is maintained, secured via the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** is considered sufficient to address *potential* significant effects on bats. Table 7.5 within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** indicates how the mitigation hierarchy has been applied; principally by avoiding all woodland habitat and the majority of hedgerows and individual trees, with substantial buffers to these retained features. Setbacks from hedgerows specifically within Fields B6, B7, B8 and B10 that link Shrubs Wood, Sheephouse Wood and Decoypond Wood have been increased to 15m (with the additional 5m from security fence to Solar PV modules. This means that gaps between panels in these adjacent fields is 40m, i.e. 20m either side of these hedgerows). This

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		precautionary principle through removal of solar arrays from all fields within the mapped Home Range of Bechstein's bat (particularly from Fields B6 to B8) is the most appropriate and justified response given the national importance and vulnerability of the Bechstein population. Comment that Natural England's suggested approach, to avoid further disturbance and disruption to the Bechstein's population from survey work and instead apply the fund of accumulated local knowledge to inform application of the precautionary principle and seek to avoid likely significant effects, is sensible and robust. Comment that the Applicant has not given any robust reasoning why it is essential that solar arrays are proposed in fields B6 to B8.	approach was adopted following consultation with Natural England, recognising that these hedgerows provide key routes for commuting and foraging bats. 30m offset from Shrubs Wood, Sheephouse Wood and Decoypond Wood are proposed for the same reasons. An offset at least 30m from existing woodland and hedgerows located along the boundaries of Field D29 and in part of Field D28 is also proposed, as it is recognised these fields provide a key link between Finemere Wood and Runts Wood. The response to Action Point 17 in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) [EN010158/APP/8.17]** sets out in more detail why there is the need for solar PV modules in these fields.
5.9.5	22 to 25 (ExA Question 1.13.2 Effects on health and wellbeing In paragraph 6.39 in part 3 of your deadline 1 submission [REP1-127] you state that "In my opinion, the proposed development would significantly adversely affect people's health and wellbeing, and the quality of their lives". Provide additional clarity on this statement – who specifically does this relate to and justify why you consider that there would be significant adverse effects on health and wellbeing?)	Response noting that Claydons Solar Action Group consider that significant adverse effects on health, wellbeing and quality of life would be experienced by high-sensitivity receptors; particularly residents who regularly use local lanes and PRoWs for recreation and health. Further comment that these effects arise as a result of unmitigable visual and non-visual landscape impacts, including loss of tranquillity, safety concerns and prolonged construction noise, which, in Claydons Solar Action Group's view, meet the threshold for significant adverse effects.	The **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) clearly recognises the importance of access to and experience of the natural environment and landscape in contributing to physical and mental health pathways – this consideration is set out within Sections 7.3 and 7.4 of the Health Effects Report. Effect pathways relating to construction noise are set out within Section 7.2 of the Health Effects Report. This includes a consideration of the mitigation secured by the **Design Commitments [EN010158/APP/5.9.5]** **Outline CEMP [EN010158/APP/7.2.4]** relating to the control of prolonged construction noise (including: • Maximising the separation distance between proposed infrastructure and surrounding sensitive receptors, where practicable; • Use of equipment with low noise emissions, where feasible; • Orientating noise emitting equipment to reduce noise level beyond the Order Limits; • The implementation of 'Best Practicable Means' as defined by the Control of Pollution Act 1974, which would serve to minimise the potential noise and vibration impacts at receptors in the vicinity of the construction works; • Temporary noise barriers close to noise-producing plant to minimise construction induced noise levels, where there is potential for the construction works to give rise to medium or high impact magnitudes at noise sensitive receptors; and • Where practicable, temporary enclosures will be used to screen all static or semi-static plant from noise sensitive receptor locations.

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			A full list of measures related to the management of noise-related effects on health are listed at paragraph 7.2.14 of the **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. Effect pathways relating to public safety are set out within Section 7.6 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. The Applicant notes that users of PRoW will experience several types of environmental change – however it is also noted that the Health Effects Report clearly identifies that the only significant adverse effects likely to be experienced by users of PRoW are landscape and visual effects – other environmental effects are negligible or not significant, or beneficial in some cases where community access is improved during the operational phase. The Applicant notes that there are 96 PRoW and permissive paths within the community study area, some of which are adjacent to, or intersect the Order Limits, of which less than a third would be subject to significant adverse effects for users during construction operation, and that this is limited to landscape and visual amenity effects and would not be experienced on the full length of all PRoW. All other effects on PRoW and their users would be negligible or not significant – including effects relating to noise, air quality, community accessibility and severance, non-motorised user amenity and fear and intimidation. Although not significant, slight beneficial effects are also reported on community access (PRoW and Permissive Paths) and their users (WCH) - the creation of new permissive paths would also increase community accessibility and recreational opportunities in an area that is currently inaccessible. The routes would improve community connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west. As such, cumulatively, and based on the limited spatial scale, this is not likely to result in significant adverse effects on health at a population scale.
5.9.6	25 to 27 (ExA Question 1.15.10 BESS mitigation Would the provision of additional hedgerow and/ or tree planting in the vicinity of the BESS serve to reduce landscape and visual effects, having regard to the topography? If not, why not?)	Response noting that the BESS would sit in a visually sensitive valley setting crossed by key PRoWs and overlooked by elevated viewpoints and heritage assets. Further comment that the successfulness of screening would have varying levels of success depending on the viewpoint, receptor and effect in question. Further comment that screening would in itself cause high adverse effects through loss of characteristically open views.	As noted in the response to Q1.15.9 in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13]** [REP2-087], the BESS has been located in a lower lying area of the Site with strong existing field boundary vegetation to reduce visual impacts, particularly for people with views from more elevated locations. The **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] indicates the route of the closest footpath ECL/7/2 as having potential for mitigation hedgerow planting, which could be effective for screening views from the nearest visual receptors using the footpath. The loss of any potential more distant open views would be a consideration in the detailed design of any mitigation proposals, which would also be dependent on the detailed BESS design. The Applicant refers to its responses on this topic to this parties written representation at Deadline 1 [REP1-127] and [REP1-128] set out in the **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] (including, for example, at ref 9.1.19).
5.9.7	27 to 32 (ExA Question 1.16.14	Response on the outline CEMP recommending amendments to the monitoring methodology including that short-term noise monitoring should coincide	Targeted short-term attended monitoring during the construction and decommissioning phases would be undertaken at key sensitive receptors to ensure noise levels remain within defined acoustic criteria. This would consider periods when construction works are being undertaken in the vicinity of off-site receptors where targeted mitigation measures have been introduced to avoid potential exceedances of the defined acoustic criterion. In the

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	'Mitigation and monitoring' To what extent do the applicant's updated Outline Construction Environmental Management Plan [REP1-078], Outline Operational Environmental Management Plan [REP1-080] and Outline Decommissioning Environmental Management Plan [REP1-082] address your respective concerns regarding mitigation measures or monitoring for noise? Identify any further amendments to these documents that you consider to be necessary and explain why they are needed.)	with periods of high-noise construction activity such as piling, with exceedances triggering longer-term unattended monitoring and the introduction of additional mitigation measures to ensure noise levels meet the agreed criterion. Further comment that there is no reference in the outline CEMP to minimum working distances between piling and receptors or a vibration assessment done for piling, or other high vibration generating activities which should be provided (or its exclusion justified). Comment on the outline OEMP recommending that an updated operational noise assessment should be required and undertaken once specific plant data are available, with a clearly defined and minimal period between installation and verification monitoring to ensure any excessive noise is identified and mitigated promptly, avoiding prolonged adverse effects. Comment noting the omission of BESS inverters within the operational phase assessment. Comments on the outline DEMP noting similar concerns as with the outline CEMP such as that while targeted short-term noise monitoring during decommissioning is appropriate, it should coincide with high noise-generating activities, with exceedances triggering longer-term unattended monitoring and the introduction of additional mitigation to ensure compliance with agreed acoustic criteria. Comment noting that the operational noise assessments fail to consider the cumulative noise effects arising from the Proposed Development in combination with the Statera scheme, despite this being a previously raised and relevant concern that should be addressed.	event that the monitoring demonstrates that the BS 5228-1 noise threshold criterion is being exceeded, this would trigger further mitigation being introduced and extended periods of monitoring to demonstrate compliance. The construction phase monitoring is secured in Table 3.8 of the **Outline CEMP [EN010158/APP/7.2.4]**. The decommissioning phase monitoring is secured in Table 3.8 of the **Outline DEMP [EN010158/APP/7.4.4]**. Piling works for the PV frames will be a highly transient activity, with each small pile typically taking less than a minute to install. Given the small scale of the solar piling rig and the low hammer energy, there are not predicted to be any exceedances of the 1 mm/s PPV criterion at the surrounding receptors as a result of the PV piling works. On the basis of the BS 5228-2:2009+A1:2014 Annex E piling calculation, assuming a worst-case kp value of 5 for piles being driven to refusal, a nominal hammer energy value of 1250 joules (MGI Tonker 830 or equivalent), and a pile toe depth of 3m, the 1 mm/s PPV significance criterion has the potential to be exceeded when works are taking place within approximately 50m of sensitive human receptors. The proposed piling works are not intended within this distance. Specific construction and decommissioning phase plant/equipment specifications are not defined at this stage, however, this information would form part of the detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan at the appropriate stage. The minimum separation distances for all works will be determined at those stages, if necessary, and would be incorporated within the management plans. An updated operation (including maintenance) phase assessment would be undertaken as part of the detailed design stage. This will account for any design development that may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits. This is secured in Section 2.8 of the **Outline OEMP [EN010158/APP/7.3.4]**. Prospective design solutions will not be progressed if the associated noise levels post-mitigation result in any significant adverse effects i.e. no greater than the residual significance of effects presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. The rating noise levels to be achieved at the surrounding sensitive receptors are secured in the **Draft DCO [EN010158/APP/3.1.5]**. BESS inverters have been included as part of the operation (including maintenance) phase assessment set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. The current design solution that has been used to inform the operation (including maintenance) phase noise assessment incorporates inverters that are housed within the BESS generic containers, therefore, the noise emissions from BESS units incorporate noise contributions from the inverters. Cumulative noise effects are considered in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** which includes the East Claydon BESS. No exceedance of the LOAEL is predicted considering cumulative developments. No significant noise effects are predicted.

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5.9.8	Page 32 to 35 (ExA Question 1.6.2 BESS Capacity 1. The Grid Connection Statement [APP-137] confirms that the proposed development seeks a grid connection to support import of 335 megawatts (MW) (alternating current) of electricity. Is this the same as the capacity for the proposed BESS? If not, explain why, and confirm the capacity of the proposed BESS. (Also see question Q1.1.1) 2. The Planning Statement [REP1-016] explains that the BESS is proposed to support the operation of the main solar nationally significant infrastructure project, to store energy generated by it and export it to the National Electricity Transmission System when it is needed. Explain why an import capacity of 335MW from the grid is sought, if the main purpose of the BESS is to store energy generated by the solar panels serving the proposed development? 3. Are there any measures as part of the application control documents to ensure that any energy stored in the BESS comes directly from the proposed development? If not, why not and explain how the	Comment that the proposed reduction to 335MW is not shown on NESO's registers and even if the reduction takes effect the capacity of the BESS is likely to be higher than 335MW. Response noting that NPS EN-3 (para. 2.10.71) recognises battery storage as an optional component to solar schemes, yet the Applicant has not provided sufficient detail on the land take, mass, footprint or ancillary infrastructure of the BESS to assess its subordination to the solar development or whether it could be removed or reduced to avoid adverse impacts. Further comment noting that clarification of the Proposed Development's commercial rationale would be assisted by the Applicant setting out the expected revenue streams from the BESS separately from those generated by the solar PV element, to determine whether the BESS is ancillary or a primary source of revenue. Further comment that the awarding of Gate 1 status to the BESS indicates that it is surplus to National Grid requirements. Reference to an open letter from Energy Minister Michael Shanks and the Director General for Infrastructure at Ofgem which confirms that granting of consent for a BESS assessed not to meet strategic requirements would conflict with government efforts to streamline connections and stabilise the grid.	Please see **Ref. 3.1.2**. The TEC Register was 'frozen' in March 2025 as part of the Connections Reform process. Since results were published in December 2025, the TEC Register has been progressively updated. However, it has always been and remains the case that only once a bilateral agreement has been signed between NESO and a connecting party, certain elements of that agreement are published on the TEC Register. The Applicant has been informed that: • The solar component of the Proposed Development will receive an Agreement to Vary (AtV) its existing connection agreement to move it to a Gate 2 Phase 2 connection offer. The confirmed connection date for such offers is expected to be between 2031 and 2035 and will be confirmed before the end of January 2027 by NESO (timelines subject to change). • The BESS component of the Proposed Development will receive an AtV to its existing connection agreement to move it to a Gate 1 connection offer. The indicative connection date for such offers has not yet been confirmed but is expected to be confirmed later this year or in early 2027 by NESO. Once the AtVs are agreed between NESO and the Applicant, the TEC Register will be updated (subject to NESO timelines). The Applicant understands that at this time, the reduction in capacity as requested will be reflected in the revised contracts. The **Statement of Need [EN010158/APP/5.6]** [APP-036] describes the difference between power capacity and energy capacity of energy storage systems at Paragraph 6.11.52 to 6.11.68. The power capacity of the BESS (which is measured in MW) will be informed by the export and import capacity of the connection available to it. The relevant physical parameters of the BESS are set out in the **Design Commitments [EN010158/APP/5.9.5]**. The footprint of the BESS compound will be no greater than 105,000m^2 and the height no greater than 6m AGL. The BESS units themselves are no greater than 4.5m AGL. BESS designs are evolving and technology is advancing. As they do, energy density (MWh energy storage capacity per BESS Container) is increasing. Further, the Applicant's **Outline BSMP [EN010158/APP/7.9.4]** explains that NFCC guidance in place at the time of detailed design, with amendments (where permitted under the NFCC guidance) to align with other guidance such as NFPA 855, would be followed for design parameters such as spacing (See Section 5.5) and therefore may also impact the MWh capacity of the Proposed Development at a future time. Therefore, the energy storage capacity of the BESS (which is measured in MWh) is not a reasonable control parameter for the design of the BESS component of the Proposed Development. The Applicant therefore confirms that its indicative design for the BESS: • Will have a power capacity no larger than the import/export capacity of the grid connection agreement (expected to be 335MW), and • Will not exceed the maximum parameters committed to within the DCO through the **Design Commitments [EN010158/APP/5.9.5]**. The Applicant confirmed at Issue Specific Hearing 1 on 20 May that the Applicant's indicative BESS energy storage capacity based on the concept design is currently approximately 1GWh. This value is subject to change either up or down depending on available technology at the point of detailed design.

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	BESS would meet the definition of associated development in the Planning Act 2008 and in accordance with guidance on associated development applications for major infrastructure projects April 2013)		The Applicant disagrees that the purpose of paragraph 2.10.71 of NPS EN-3 (2023) is to provide that storage may be removed from an application if required to avoid or reduce adverse impacts. Paragraph 2.10.71 states that *"Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage."* Section 6.4 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** explains how flexibility has been maintained in the Proposed Development's design in accordance with NPS EN-3 (2023) and that the worst-case scenario has been assessed for the purposes of the EIA. Appendix 1 to the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]** provides a detailed explanation of how the BESS satisfies the tests for "associated development" in accordance the PINS guidance "Planning Act 2008: Guidance on associated development applications for major infrastructure projects". Detail is also provided at section 6.5 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]**. The Applicant disagrees that insufficient detail has been provided; a full description of Work No. 4, which incorporates the BESS and all associated ancillary infrastructure, including the maximum design parameters incorporated into the Proposed Development's design, is provided at section 3.7 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2] [REP1-034]**. The maximum footprint of Work No. 4 is also shown clearly on Sheet 7 of the **Works Plans [EN010158/APP/2.3.4]**. In relation to the Gate 1 status of the BESS, the Applicant notes the Government's 'Planning for New Energy Infrastructure' consultation response to the current (January 2026) designated National Policy Statements. In their response, the government state that "*Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals.*" Further, paragraph 3.2.6 of the currently designated (updated) NPS EN-1 which is potentially important and relevant to this DCO Application, clarifies that *"It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types"*. The Clean Power 2030 Action Plan calls for a large capacity of new low carbon generation and low carbon flexible schemes to come forwards to be prioritised for 2030, while maintaining a robust pipeline beyond 2030 to keep the power system clean as electricity demand increases. Consenting schemes with connection dates in the 2030s feeds the pipeline of projects needed to connect in that timeframe and beyond. Therefore, the policy position supports the Applicant's view that the need established by NPS EN-1 continues to apply to any scheme or component of a scheme which currently has a Gate 1 connection agreement.
5.9.9	35 (ExA Question - Q1.4.4 1 Is overplanting proposed? If so, how much and why? If not, why not? 2. To what extent would panel degradation reduce the output of the proposed	Response noting that the Applicant has failed to define the extent of any overplanting or panel layout flexibility, contrary to NPS EN-3 requirements to assess the worst-case scenario, thereby preventing proper assessment of environmental effects or consideration of	The Applicant notes that the Party refers to Footnote 92 of NPS EN-3 (2023). That Footnote starts by explaining that "Overplanting" refers to the situation in which the installed generating capacity or nameplate capacity of the facility is larger than the generator's grid connection. The **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** explains that the Applicant has requested a reduction to the Grid Connection capacity contracted at the time of submission (500MW) to 335MW. The Applicant confirms that the control parameters set out in the **Draft DCO [EN010158/APP/3.1.5]** represent a binding conservative scenario for the assessment of the Proposed Development, and that any effects arising from the Proposed Development have been assessed in an appropriate way for the purposes of this DCO Application.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
	development over its lifetime in the absence of overplanting? 3. If overplanting is not proposed, would this increase the need to replace solar panels during the 40 year operational phase? (also see question 1.8.8))	whether adverse impacts could be avoided through a reduction in scale. Further comment noting that in the absence of information on alternative panel numbers, layouts and storage options, it is not possible to establish whether adverse impacts could be avoided by reducing the area of land occupied by infrastructure.	
5.9.10	35 to 39 (ExA Question - Q1.7.8 6 The ExA note your response to Action Point 3 from compulsory acquisition hearing 1 [REP1-107]. However, the ExA seeks additional clarification in the ES regarding the extent of ecological mitigation, compensation and enhancements proposed – these are 3 distinct elements of the ES assessment which need to be understood and whilst the ExA accepts that the same parcel of land can provide more than one function, the ExA must have confidence that adequate mitigation or compensation is provided where effects have been identified. Enhancements should also be identified where they could be achieved.)	Response stating that the Applicant misinterprets the EIA Regulations 2017 by failing to clearly distinguish between avoidance, mitigation, compensation and enhancement. Further comment that this undermines the credibility of the ES and Biodiversity Net Gain Assessment, since without properly identifying and quantifying measures to avoid, reduce or offset harm, no genuine enhancement can be claimed or weighed in the planning balance.	The Applicant has undertaken the EIA assessment on the Proposed Development in line with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and in accordance with, but not limited to, the following guidance: • Nationally Significant Infrastructure Projects - Advice on the Preparation and Submission of Application Documents; • Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements; • Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope; • Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation; • Nationally Significant Infrastructure Projects - Commitments Register; • Ministry of Housing, Communities and Local Government. Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (30 April 2024); and • Institute of Environmental Management and Assessment (IEMA) (now ISEP) 'Environmental Impact Assessment Guide to Shaping Quality Development' (2015). Paragraph 5.11.1 of **ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]** [APP-048] sets out the sequential steps of the mitigation hierarchy that has been followed throughout the evolution of the design of the Proposed Development. These are: • Avoidance: Measures taken to avoid creating impacts from the outset; • Prevent: Measures taken to prevent impacts; • Reduce: Measures taken to reduce the duration, intensity and extent of the impact if they cannot be avoided; • Restoration: Measures taken to improve the environment following exposure to unavoidable impacts; and • Offset: Measures taken to compensate for any residual impacts. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047] and Section 5 of the **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018], set out the design evolution of the

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
			Proposed Development which demonstrates how the mitigation hierarchy has been applied from avoidance to the implementation of offsets which are committed to within the **Design Commitments [EN010158/APP/5.9.5]**. Each environmental factor chapter (**ES Volume 2, Chapters 6-16 [APP-049 - REP01-042]**) clearly sets out, under distinctive subheadings, the embedded mitigation (otherwise known as primary mitigation), additional mitigation (otherwise known as secondary mitigation), and any opportunities for environmental enhancement. These are quantified by a detailed understanding of the baseline environment which has been robustly assessed within each environmental factor chapter, enabling identification of appropriate mitigation measures and enhancement opportunities that are site-specific. No compensation has been undertaken in regards to the Proposed Development as the Applicant is able to mitigate, and provide enhancements within the Order Limits, requiring no off-site compensation. A demonstration of this is the Applicant's secured commitment, in paragraph 1.5.6 of the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** to commit to a minimum Biodiversity Net Gain of 40% area habitat units, 17% hedgerow units and 10% watercourse units which is above the soon to be mandatory 10% (expected in November 2026). With the above in mind, the Applicant confirms that those enhancements and/or other benefits of the Proposed Development which are summarised in paragraph 10.1.27 of the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** are accurately reported in accordance with the EIA Regulations and, therefore, qualify as tangible benefits which should be afforded weight in the planning balance.
5.9.11	39 and 40 (CSAG review of Annex 1 to the Health and Wellbeing Summary Statement)	Comment noting that the Applicant's cumulative health and wellbeing assessment (provided for in Annex 1 to the Health and Wellbeing Summary Statement) is inadequate because it fails to assess combined effects such as noise, vibration, visual loss and disruption holistically. Further comment that this is also undermined by unexplained inconsistencies in noise study areas, which misapply guidance and, therefore, risks excluding receptors who may experience significant cumulative impacts.	**ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** includes a consideration of intra-project (in-combination) and cumulative (inter-project) effects, drawing on guidance for the consideration of health pathways set out in IEMA (now ISEP) guidance. The guidance notes that positives or negatives do not necessarily reinforce each other in combination, and that clearly stating whether a population experiences an overlap in effects from a range of determinants of health is usually more appropriate than calculating a net effect on public health. For the Proposed Development, in-combination effects have been assessed in each of the relevant ES chapters (**ES Volume 2, Chapters 6-16 [APP-049 - REP01-042]**) in compliance with paragraph 5(2)(a) to (d) of the EIA Regulations 2017. A review of the sensitive receptor (or sensitive receptor group) identified in each technical chapter, and whether the same receptor is exposed to more than one type of residual (post-additional mitigation) effect of 'slight/minor' significance or greater, during the construction, operation (including maintenance) and/or decommissioning phases of the Proposed Development has been completed. This has been summarised in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** which has identified no heath-relevant receptors are likely to experience in-combination/intra-combination significant effects. The noise and vibration study area for the assessment of the construction and decommissioning phases as set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** considers noise and vibration sensitive receptors that are located within 300m of the Order Limits. This has been determined based on the guidance set out in BS 5228-1, BS 5228-2 and other related guidance documents, including DMRB LA 111. For the cumulative assessment presented in **ES Volume 2, Chapter 17: Cumulative Effects**

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			[EN010158/APP/6.2.3] [REP2-037], this has considered a doubling of this distance, on the basis that an individual receptor could be affected by two developments that are under construction in opposing directions.
5.9.12	40 to 42 (CSAG review of CEMP REP1-077 OEMP REP1-080 LEMP REP1-086)	Comment noting that the suite of management plans use terms such as "where possible" and "where practical" often while other management plans offer similarly vague and insecure commitments. Further comment requesting clear definition of these measures.	The Applicant has sought a degree of flexibility in the DCO Application to accommodate for changes in technological and best practice advancements at the time of construction. This is a common and accepted approach for similar developments. Therefore, the use of terms such as 'where possible' and 'where practical' have been used to allow for changes to consider any advancements or changes to best practice/legislation/guidance. Further detail will be included in the detailed management plans following the completion of the detailed design should consent be granted for the Proposed Development. In addition, it is set out and secured within the Requirements in the **Draft DCO [EN010158/APP/3.1.5]** that the detailed management plans must be substantially in accordance with the outline management plans currently subject to review and comment in this Examination and will be submitted to and approved by the relevant local authority (in consultation with other organisations as relevant).
5.9.13	43 to 50 (CSAG attachments of an open letter from DESNZ and Longhedge Solar Farm Appellant Response)	Two attachments are provided at the end of the submission related to Connections Reform and an Appellant's Response to Longhedge Solar Farm's Capacity.	The Applicant notes these submissions but does not consider there is anything within them that warrant direct response in relation to the Proposed Development.

Table 5.10: Hogshaw Farm & Wildlife Park [REP2-104]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.10.1	1 (ExA Question Q1.16.14 on Mitigation and monitoring)	Response noting that, on review of the updated outline CEMP, outline OEMP and outline DEMP, these documents still do not address the concerns of Hogshaw Farm & Wildlife Park as the noise assessment and management approach is not sufficiently site specific to the quieter, tranquil setting of parts of their site.	The Applicant has undertaken a detailed assessment of construction and operational (including maintenance) noise which concludes that there would be no significant effects on the existing environment. The assessment is provided in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** Mitigation measures to reduce noise to receptors, including Hogshaw Farm & Wildlife Park, during construction and operation (including maintenance), which include using temporary enclosures and minimising drop heights are detailed and secured in the **Outline CEMP [EN010158/APP/7.2.4]** and **Outline OEMP [EN010158/APP/7.3.4]** (and by Requirements 11 and 13 of the **Draft DCO [EN010158/APP/3.1.5]**). The predicted specific noise levels during the operation (including maintenance) phase of the Proposed Development at Hogshaw Farm & Wildlife Park are very low at approximately 30 dB(A), which is lower than ambient sound levels measured by the acoustic consultant acting on behalf of Hogshaw Farm & Wildlife Park in their targeted monitoring locations. Furthermore, the noise prediction model assumes downwind propagation from each item of noise-emitting equipment towards the receptor, regardless of their respective positions within the Order Limits; this represents a precautionary approach in terms of noise predictions at receptors within the Study Area. As a result, it is not considered that the predicted operation (including maintenance) noise levels are sufficient to result in significant adverse effects at Hogshaw Farm & Wildlife Park.
5.10.2	1 (ExA Question Q1.19.13 on oCTMP – co-ordination with local business and visitor attractions)	Response noting that while proposed stakeholder engagement measures and avoidance of Snake Lane roadworks during the summer holidays are welcome, these commitments are limited and do not adequately safeguard Hogshaw Farm & Wildlife Park's year-round operation or its dependence on visitor access outside the school holiday period.	The worst-case traffic flow anticipated during the normal visitor hours of Hogshaw Farm during the construction phase will be principally HGV traffic as noted in Table 5.1 of and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**. At 141 movements (70 inbound and 70 outbound) per day, this equates to one inbound HGV every ten minutes on average. This traffic flow is not considered to have an appreciable impact on the operation of the business.
5.10.3	1 (ExA Question Q1.19.13 on oCTMP – co-ordination with local business and visitor attractions)	Response noting that the amendments to management plans focus largely on notification and liaison measures but fail to address the core concerns regarding cumulative construction traffic impacts. Further comment noting that the measures offer no meaningful mechanism to prevent the Proposed Development from exacerbating existing disruption from major infrastructure projects or to secure clear outcomes if the business is materially affected.	There are no other cumulative traffic flows associated with the road network bordering Hogshaw Farm, so no cumulative effects are predicted. HS2 and East West Rail traffic flows do not use the road network bordering Hogshaw Farm.

Table 5.11: East Claydon Parish Council [REP2-094]

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
5.11.1	1, row 1 (ExA Question Q1.1.1 & Q1.1.3 on installation capacity and grid connection)	Response requesting that the Applicant provides clear statements on the true GHG emissions and savings associated with the capacities of the solar and BESS elements. Further comment that the Applicant has not made a strong needs case.	Within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, the GHG emissions associated with the Proposed Development are clearly quantified based on the stated installed capacity of 334.1 MW (Paragraph 8.8.14). Lifecycle emissions total 1,191,562 tCO_2e (Paragraph 8.8.9), comprising 642,309 tCO_2e from construction (Paragraph 8.8.5), 462,996 tCO_2e from operation including maintenance (Paragraph 8.8.7), and 86,258 tCO_2e from decommissioning (Paragraph 8.8.8). These emissions are offset by substantial generation over the 40-year operational life, estimated at approximately 12,030,492 MWh (Paragraph 8.8.14). This enables significant GHG savings through displacement of higher carbon electricity generation, with total savings exceeding 3 million tCO_2e over the lifetime of the Proposed Development (Paragraph 8.8.19), demonstrating a clear net beneficial effect in GHG terms. The need for the Proposed Development is supported by policy and legislative drivers set out within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**. Section 8.2 confirms that the Overarching National Policy Statement for Energy (NPS EN-1) (2023) identifies solar generation as Nationally Significant Infrastructure (Section 8.2), while Paragraph 8.4.1 links the assessment to the UK's legally binding net zero target under the Climate Change Act 2008 (as amended) and the Paris Agreement. The assessment explicitly recognises that the Proposed Development contributes to decarbonisation through the displacement of fossil fuel-based electricity (Paragraph 8.4.4), and that renewable developments are expected to support the decarbonisation of the national grid (Paragraph 8.5.11). Furthermore, Paragraph 8.8.17 states that the need for carbon abatement is immediate and that developments such as the Proposed Development play a vital role in the pathway to Net Zero, with Section 8.10 confirming that renewable energy infrastructure is essential to reducing GHG emissions and enabling the transition to a low carbon electricity network. Further, the **Statement of Need [EN010158/APP/5.6] [APP-036]**, provides a strong case to support the policy position which is clarified in NPS EN-1 (at paragraphs 3.2.6 to 3.2.8 of the 2023 versions and at paragraphs 3.2.8 to 3.2.10 of the 2025 versions) that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established.
5.11.2	1, row 2 (ExA Question Q1.1.6 on Solar Road Map)	Comments on the Solar Road Map, including: - agreeing that there should be greater encouragement and requirement for installation of solar panels on domestic and commercial buildings, noting 'huge scope in area' for panels on warehouse buildings. - Disagreeing that solar installations cause minimal disturbance to the ground and that grazing of livestock	The Applicant is supportive of an increase in rooftop solar however agrees with Government's view, as set out in NPS EN-1 (3.3.12) that they will not replace the need for new large-scale electricity infrastructure to meet our energy objectives, and therefore that rooftop solar is needed alongside, rather than instead of, large-scale solar schemes. The Applicant notes that the government's Clean Power Capacity Ranges (see Table 1 of the **Statement of Need [EN010158/APP/5.6] [APP-036]** are for large-scale schemes only and small-scale schemes are also anticipated to come forwards to deliver an overall larger capacity of operational solar in the UK by the years stated. The Applicant considers that local communities have been central to the Proposed Developments design development and the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018]** sets out how consultation feedback from the community, as well as consideration of likely effects on the surrounding area have been taken into account to reach the design at submission of the DCO Application. Further, the **Planning**

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		alongside solar installations is a realistic proposition - Agreeing that there is threat to livelihoods of tenant farmers where land is taken for solar development which is not resolved through financial compensation - Agreeing that "Local communities must be at the centre of local project development and directly benefit from clean energy projects' but that they do not consider that this is the case for Rosefield Solar Farm, or other electrical infrastructure projects in the area.	**Statement [EN010158/APP/5.7.3] [REP1-016],** at Section 3, sets out the benefits of the Proposed Development for the local community.
5.11.3	1, row 3 (ExA Question Q1.4.2 on Continued use of agricultural land (see also Q1.7.17)) 3, row 4 (ExA Question Q1.7.17 on Proposed use of grassland and grazing)	Response noting concern that the Proposed Development's sheep and cattle grazing is no more than a proposal. Further comment noting that with the loss of tenant farmers, who would be responsible for ensuring grazing persists over the operation phase of the Proposed Development.	The commitment to sheep and cattle grazing is set out and secured within the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** and Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. The final prescriptions will be set out in the detailed Landscape and Ecological Management Plan which must be in substantial accordance with the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** and must be approved by the relevant planning authority in consultation with the Environment Agency and Natural England. The Applicant would be responsible for arranging grazing during the operational period. Grazing on solar farms is typically arranged in partnership with local farmers and opportunities to provide grazing would be made available to existing tenants, subject to commercial agreements.
5.11.4	2, row 1 (ExA Question Q1.1.5 Mitigation on travel arrangements for construction staff) 8, row 3 (ExA Question Q1.19.6 on travel arrangements for construction staff to and from the Site)	Response noting concern over staff travelling to the Site by minibus. Further comment noting that the outline CTMP contains no provision to ensure a large amount of vehicles do not travel through local villages. Further comment noting concern with the lack of commitment to ensuring staff travelling to Site avoid going through East Claydon and Botolph Claydon.	The movement of construction staff is set by the Staff Travel Plan, described in section 4.10 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The route to Site is described in in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]** and shows that no traffic will be permitted to pass through the Claydon villages. The routes for all traffic are detailed in Section 2.1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The use of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** and the Staff Travel Plan is secured by Requirement 13 of the **Draft DCO [EN010158/APP/3.1.5]**. That Requirement states that a detailed Construction Traffic Management Plan which is substantially in accordance with the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** must be submitted to and approved by the relevant planning authority in consultation with the local highway authority prior to the commencement of any part of the Proposed Development. All construction works must be carried out in accordance with the detailed Construction Traffic Management Plan (including the Staff Travel Plan). Accordingly, it is a legal requirement for construction traffic to use the routes described in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**.
5.11.5	2, row 2 (ExA Question Q1.7.1 on Adequacy of applicant's response to	Response noting detailed concerns with the Applicant's responses to the Interested Party's Relevant	In response to each bullet point under point 1 in turn,

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	relevant representations made by East Claydon Parish Council)	Representation. Comments of concern are summarised as follows: • disagreement with the Applicant's comments with regard for the consultation process with reference to 5 specific points of contention; • the Applicant notes the limited BMV take of the Proposed Development but fails to adequately address the true socio-economic consequences of the Proposed Development and that proposals for grazing are not well thought-through and lack guarantees; • consideration that the site selection process is flawed and that no further clarification on the site selection process was provided for in the Applicant's responses to Relevant Representations; and • consideration that the assessment of wind was based on the Applicant's view that the Site is low and flat, though the Party considers much of the Site to be hilly.	• *"Importance of agriculture and its interdependencies across the communities"* – The Applicant is cognisant of this and confirms that an assessment on the scale of indicative land use and employment capacity change in the agricultural economy, and effects on agricultural and non-agricultural businesses has been undertaken in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** [REP2-033]. Furthermore, **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** includes a Health Effects Report which has been provided to consolidate consideration of the effects of the Proposed Development on human health and wellbeing. • *"Specifically, the local and national importance of Preston Farms/TCS Biosciences"* - **Appendix 1** to the **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] has been prepared to provide a single source of responses to the matters and issues raised by Preston Farms Ltd and TCS Biosciences Ltd. This Appendix sets out the Applicant's current understanding of the Preston Farms operation, the potential impact of the Proposed Development on Preston Farms, and steps taken to mitigate them. • *"Importance of the local PRoW network and rural roads as recreational assets and for the health and wellbeing of residents and visitors from a wider area"* - **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** provides a summary of all of the likely significant (moderate and above) and minor significance in-combination and cumulative effects reported within the ES, and describes them in terms of their relevance to health in-line with relevant guidance - this includes a consideration of the in-combination effects on PRoW users. The Applicant also points to Ref. 4.7.52 in **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]** [REP2-085] where both Buckinghamshire Council and the Applicant recognise the enhancements that the Proposed Development proposes to make to the PRoW network. • *"Importance of tranquillity, contact with the countryside and wildlife, dark skies to health and wellbeing and residential amenity"* – The Applicant points to responses under Refs. 9.1.16, 4.3.11 and 9.1.38 of **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] in address of these points. • *"Critical contribution of the surrounding countryside to the setting of key heritage assets and conservation areas"* - The Applicant points to responses under Refs. 3.3.1, 3.3.2 and 7.3.1 of **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] in address of these points. In response to point 2, the Applicant disagrees and points to its responses at Refs. 9.2.1 and 9.3.4 of **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086] which demonstrate how the Applicant has considered and addressed any potential socio-economic impact of agricultural land-take. In response to point 3, the Applicant points to the response provided for against Ref. 2.3 of **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]** [REP2-085] and Ref. 1.1.20 of **Applicant's Response to Written Representations [EN010158/APP/8.12]** [REP2-086]. With regard for the Preston Farms/TCS Biosciences point, the Applicant refers to the response provided under **Ref. 5.5.5** above. The commitment to sheep and cattle grazing is set out and secured within the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] and Requirement 7 of the **Draft DCO [EN010158/APP/3.1.5]**. The **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] was updated at Deadline 2 to provide a clear overview of the current grazing regime on-site, where grazing would be lost, where grazing would be retained and where new areas of

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			grazing are proposed. This is illustrated within **Appendix 6** of **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067](see **page 121**). In response to point 4, the Applicant assumes that the document reference referred to is related to **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [APP-047]**. 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]**.**
5.11.6	3, row 2 (ExA Question Q1.7.9 on justification for not surveying the cable corridors) 3, row 5 (ExA Question Q1.7.18 on calculation of habitat loss does not include certain areas of the Site)	Response noting that, without ecological surveys along cable corridors, the Applicant has no basis for assessing harm or scope for the displacement of species. Further comment that the Applicant's calculations for habitat loss are therefore flawed.	As detailed within **ES Volume 4, Appendix 7.7: Preliminary Ecological Appraisal (2025) [EN010158/APP/6.4]** [APP-093] and **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2]** [REP1-060] the full Order Limits has been subject to a Preliminary Ecological Appraisal including UK Habitat survey and condition assessment, and potential for legally protected species to be present. This has included the cable corridors, with habitat loss occurring as a result of works during the construction phase being fully accounted for within the BNG calculations based on the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]. The BNG assessment will be updated again at the detailed design stage when further refined details are available Areas such as the Cable Corridor will only be subject to short-term temporary effects before being returned to arable farmland, with the potential impacts that could arise from these temporary effects fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]**, and mitigation measures secured within the **Outline CEMP [EN010158/APP/7.2.4]** and **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067]**.** As such, it is anticipated that species that currently utilise these areas, could continue to use the arable farmland as they currently do.
5.11.7	3, row 6 (ExA Question Q1.8.2 on estimation of impacts on GHG)	Response requesting that the actual installed capacities for solar and BESS are provided by the Applicant. Further comment flagging interest in the estimated energy losses from the BESS and how waste heat will be managed.	The Applicant has undertaken the GHG Assessment within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** [APP-051] which assumes that the installed capacity of the Proposed Development is 334.1 MW with generation of 324,864 MWh in the first year of operation. It is worth noting that this installed capacity is subject to change based on the detailed design and panel selection / efficiency at the time of construction. The associated energy losses from the BESS are built into the GHG assessment within **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** [APP-051]**.** Whilst there will be some transmission and distribution (T&D) energy losses with the transfer of energy between the BESS and the grid, these have not been quantified in the GHG Assessment as part of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]** [APP-051]**.** This is in line with the GHG Protocol, and the standard approach for assessing GHG emissions for solar and BESS developments, such as recently consented scheme Stonestreet Green Solar project. The assessment has quantified the GHG emissions associated with the operation of the Proposed Development and generation of electricity, before any T&D losses.
5.11.8	3, row 7 (ExA Question Q1.10.4 on impact of development of Field E11 on heritage assets)	Response noting concern that the full extent of buried heritage assets across the Site remains to be established, and that National Grid have recently completed trial trenching of an area proposed for cable connections from the proposed Rosefield substation. Comment	The Applicant acknowledges that there are uncertainties regarding below ground archaeological remains across the Order Limits, unknown heritage assets are considered within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** [REP2-027]. The Applicant has agreed with Buckinghamshire Council that the programme of post-DCO consent work proposed within the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2]** [REP1-094] to be secured by Requirement 10 in the **Draft DCO [EN010158/APP/3.1.5]** will ensure that currently unknown remains are appropriately considered and mitigated for in the detailed design stage of the Proposed Development. Buckinghamshire Council confirmed via email on 5 May 2026 that a report

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		that these results should be reviewed to develop a fuller picture of the likely effects of the Proposed Development and any cumulative effects.	on the National Grid Substation trial trenching was not yet available. As set out within the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2]** [REP1-094] , the Applicant will incorporate the results of any fieldwork for adjacent projects into the analysis of work required under the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2]** [REP1-094] .
5.11.9	3, row 8 (ExA Question Q1.10.11 on impacts on the settings of conservation areas)	Response noting that the Applicant's responses to date have not given due attention to the importance of the rural settings of the Botolph Claydon Conservation Area and East Claydon, as well as cumulative impacts of the Proposed Development, the National Grid substation and Statera BESS on views of the Grade II* Listed St Mary's Church and the Grade II Listed White House approached from East Claydon Road and from Sion Hill.	The Applicant has considered the impacts on Botolph Claydon Conservation Area and East Claydon within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2]** [REP2-027] and **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** [REP2-046]. The Applicant considers that there would be less than substantial harm as a result of the changes to the setting of these assets during the construction, operation (including maintenance) and decommissioning phases of the Proposed Development. The cumulative effect of the Proposed Development in combination with the proposed National Grid Substation and other developments is not considered to increase the level of harm compared to the Proposed Development in isolation.
5.11.10	4, row 3 (ExA Questions Q1.11.12-15 on cumulative effects with the proposed replacement National Grid substation)	Response noting that it is disingenuous for the Applicant to conclude that *"Provided there is adequate mitigation for the National Grid East Claydon Substation development there should be no inter project cumulative effect"* as the Proposed Development is in proximity to other cumulative developments which will give rise to considerable and combined harm (including visual harm, loss of amenity on PRoWs, noise loss of habitat and pollution threat to watercourses).	This statement simply assumes that other projects assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** [REP2-037] would incorporate appropriate best practice mitigation measures to avoid, reduce and mitigate their own effects. This reflects industry standard practice and the requirements typically necessary for those developments to secure consent, and it would therefore be unrealistic to assume that such projects would proceed without their own appropriate mitigation in place. As detailed above (see response to **Ref. 5.11.5**) the full Order Limits has been subject to a Preliminary Ecological Appraisal including UK Habitat survey and condition assessment ensuring a full understanding of the baseline habitats present. Accordingly, the Applicant maintains that the cumulative effects assessment for the Proposed Development is appropriately robust and comprehensive.
5.11.11	4, row 4 5, row 1 (ExA Questions Q1.11.16-26 on cumulative effects with other projects)	Response noting concern with the Applicant's cumulative assessment because it assumes that other projects would have mitigation in place that would minimise individual impacts and so would have little additive effect. Further comment that multiple negative residual effects must result in a cumulative impact. Further comment noting that the lack of an established baseline for habitats means there is no basis for understanding cumulative impacts.	The Applicant has assumed that other projects assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** [REP2-037] would incorporate appropriate best practice mitigation measures to avoid, reduce and mitigate their own effects. This reflects industry standard practice and the requirements typically necessary for those developments to secure consent, and it would therefore be unrealistic to assume that such projects would proceed without their own mitigation in place. The cumulative effects assessment detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** [REP2-037] has been undertaken to consider other existing and/or approved developments in isolation and in combination with one another to determine the cumulative impact. As detailed above (see response to **Ref. 5.11.5**) the full Order Limits has been subject to a Preliminary Ecological Appraisal including UK Habitat survey and condition assessment ensuring a full understanding of the baseline habitats present.

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		Comment noting that the Applicant should consider: • the risk of a thermal runaway event is a function of the number of battery cells, given the number of BESS installations proposed around the East Claydon National Grid substation this means that there would be a large presence of batteries thereby giving rise to a cumulative 1 in 6 thermal runaway risk in the local area. • the risk of 'bad actors' targeting the cumulative electrical infrastructure in the area.	The LOPA analysis that has been carried out is included within the Plume Assessment **BESS Plume Assessment Summary [EN010158/APP/7.13.3]** calculates the probability of a thermal runaway event occurring as less than 1 in 5000 years. BESS failure is a systems safety issue and does not relate to the number of cells in any single project or group of projects. Factory Acceptance Testing and Site Acceptance Testing to international recognised standards for BESS systems is significantly reducing failure events. The Applicant is committed to minimising failure risks, Section 6.1 of the **Outline BSMP [EN010158/APP/7.9.4]** stipulates *"The detailed design phase would consider the lifecycle of the battery from cradle to grave. A large number of studies would be undertaken, with a focus on fire risk including, but not limited to, studies in line with risk analysis and management tools such as Hazard and Operability Analysis and Hazard Identification (HAZOP/ HAZID), failure Mode and Effects Analysis (FMEA), Bowtie risk assessments and Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) to inform the overall design solution. An agile method is applied during the engineering design phase for fire safety analysis. The analyses are updated based on any changes of the project context and during the design process from the selected contractors in case of any deviation from the initial set of technical requirements. These would be finalised before construction commences."*
5.11.12	5, row 2 (ExA Questions Q1.11.22 and Q1.11.31 on cumulative impacts on soil)	Response noting that the Applicant has a lack of appreciation for the clay soils characteristic of the area and the sensitivity of the soils to the Proposed Development and other projects in the area.	The Applicant recognises that the soils across the Order Limits are mostly heavy textured clay soils with sensitivity to structural damage if poorly managed. This has been described in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2] [REP2-031]** through the assessment of medium soil sensitivity, with the sensitivity classification based on the relevant guidance. The assessment relies on protection measures outlined in the **Outline Soil Management Plan [EN010158/APP/7.7.3] [REP2-069],** which includes directions for careful stripping, storage and reinstatement of soils. Where concerns are raised regarding experience from similar projects elsewhere, the cumulative effects assessment in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** appropriately assumes (for reasons set out at **Refs. 5.11.9** and **5.11.10** above) that similar soil management plans will be implemented across considered schemes. The identified significant cumulative effect in this chapter relates to the scale of permanent loss of non-BMV (Grade 3b) land, and not the degradation of soil quality. **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** will be updated during examination to further assess the cumulative impacts on Best and Most Versatile Land to ensure the best land is protected from degradation. Natural England has agreed with the level of mitigation proposed to prevent soil quality degradation, ensuring the topsoils and subsoils are stripped, handled and stored properly. In reference to the Welsh Government Report, the Applicant's specialist team wrote the report and they therefore understand the importance clay sensitivity (as also acknowledged within the IEMA Guidance). Climate and rainfall patterns are also important factors for how a soil should be handled which is why the overall sensitivity of the clays has been assigned medium. Drier clays are less susceptible to structural damage and severe compaction. The problems detailed within the Welsh Government Report stress the importance for a soil management plan and mitigation measures to prevent structural damage to clays. Additional mitigation has been proposed within the **Outline Soil Management Plan [EN010158/APP/7.7.3] [REP2-069]** to ensure the sensitive clay soils are being handled correctly. Natural England's agreeance with the level of mitigation to ensure proper handling of soils (especially clays) can be found within **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]**.

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			Furthermore, the failure of the sites referenced within the Welsh Government Report are due to the sites being situated on poor land being near impossible to restore correctly. Rosefield drier climate means the land is more workable and with correct implementation of the detailed Soil Management Plan the soil will be able to be fully restored and there will be no permanent degradation of land.
5.11.13	6, row 2 (ExA Question Q1.11.32 on liaison with other projects to minimise impacts)	Response stating that the Proposed Development does not control the movement of non HGV traffic and further comment noting that there would be cumulative traffic impacts on the limited road network.	The routes used by all construction traffic is detailed in Section 2.1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The use of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** and the Staff Travel Plan is secured in the **Draft DCO [EN010158/APP/3.1.5]** and is a legal requirement for traffic to use the routes described in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The use of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** and the Staff Travel Plan is secured by Requirement 13 of the **Draft DCO [EN010158/APP/3.1.5]**. That Requirement states that a detailed Construction Traffic Management Plan which is substantially in accordance with the Outline CTMP must be submitted to and approved by the relevant planning authority in consultation with the local highway authority prior to the commencement of any part of the Proposed Development. All construction works must be carried out in accordance with the detailed Construction Traffic Management Plan (including the Staff Travel Plan). Accordingly, it is a legal requirement for construction traffic to use the routes described in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. Given this legal control of access routes, the Applicant maintains that its cumulative effects assessment in **Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** is appropriate and robust and stands by its conclusion that there will no significant cumulative effects on the road network as a result of construction traffic.
5.11.14	6, row 3 (ExA Question Q1.11.32 on liaison with other projects to minimise impacts)	Response noting it is not clear what the extent to which the solar element of the Proposed Development is dependent on the BESS. Further comment noting scope for collaboration with the approved Statera BESS facility and whether such collaboration with Statera could obviate the Proposed Development's need for BESS.	The Proposed Development does not depend on the inclusion of BESS, though the Applicant points to Refs. 1.1.33 and 1.1.35 in **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** which both address the need for BESS, as established in national policy and in relation to NESO's prioritisation. Further, investing in unsubsidised solar is economically rational on a stand-alone basis and requires no cross-subsidisation financially to justify its investment. For example, NPS EN-3 (2023) states: *"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation"* (paragraph 2.10.5). The BESS supports the operation of the Proposed Development by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Proposed Development, being the level of carbon free energy sent to the grid. The Applicant confirms that the size and location of the Proposed Development has been carefully considered. This exercise has carefully balanced the need to maximise the grid capacity (in accordance with the Applicant's grid connection agreement) whilst also making most efficient use of the land and avoiding unacceptable impacts; such as to amenity and wildlife. The **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** sets out the reasoning for the Proposed Development, including its size and location. The Statera East Claydon BESS project has its own grid connection agreement and is therefore needed in itself. Its approval does not obviate the Proposed Development's inclusion of BESS.

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5.11.15	6, row 5 (ExA Question Q1.16.3 on impacts of noise on health and wellbeing)	Response noting the noise profile of the Proposed Development and how it would have a significant impact on the baseline. Further comment noting the nature of the sound has high potential to influence health and wellbeing.	Sources of noise associated with the Proposed Development have been considered and assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040].** The significance criteria adopted for the assessment accounts for the baseline acoustic conditions within the Study Area, in accordance with the relevant British Standards. No noise effects are identified as being significant following the adoption of appropriate mitigation measures. For residential receptors, the construction phase assessment as presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** is based on a significance threshold of 65 dB $L_{Aeq,T}$ as defined in British Standard 5228 'Code of practice for noise and vibration control on construction and open sites'. The assessment concludes that no significant adverse effects are predicted to occur following the introduction of an appropriate scheme of mitigation. The mitigation is secured via the **Outline CEMP [EN010158/APP/7.2.4]**. It could be expected that users of PRoW within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre-construction ambient noise levels. However, the construction activities affecting an individual route would often be localised, and the transitory nature of PRoW users would mean that they are not exposed to construction noise for an extended period. During the operational phase, the predicted noise levels at surrounding residential receptors are very low, which is a function of the prevailing baseline acoustic conditions. No residential receptor would experience lowest observed adverse effect level (LOAEL) exceedances as a result of noise associated with the Proposed Development. This is defined as when noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. It can slightly affect the acoustic character of the area but not such that there is a change in the quality of life. During the operational phase, noise from the Proposed Development experienced by users of the PROW would be significantly lower than that generated during construction and the proposed sources of noise would be subject to mitigation, including the use of low-noise units and perimeter barriers. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and PRoW network. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise during the operational phase, relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse effects are not expected.
5.11.16	6, row 7 (ExA Question Q1.16.14 on Mitigation and monitoring: Outline Construction, Operation and Decommissioning Environmental Management Plans)	Response stating that the measures written into the management plans relating to working with Preston Farms / TCS Biosciences on construction schedule, biosecurity and educating staff ought to apply to all agricultural activity across the Site and not just Preston Farms/TCS Biosciences. Further comment noting that it is not clear how the measures in table 3.1 of the Outline CEMP would be monitored and enforced.	The Applicant has updated the **Outline CEMP [EN010158/APP/7.2.4]** at Deadline 3 to note that the Applicant will liaise with all agricultural tenants across the Site during the preparation of the detailed Construction Environmental Management Plan. Mitigation measures in Table 3.1 of the **Outline CEMP [EN010158/APP/7.2.4]** will be monitored by undertaking regular on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to Buckinghamshire Council when asked. Monitoring will, where possible, include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100m of the Order Limits in agreement with the relevant homeowners/landowners. Regular Site inspections to monitor compliance and recording of inspection results will take place. The inspection log will be made available to the Local Planning Authority when asked.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		Further comment on the outline SWMP and what the implications are of the statement made in para. 3.5.1 (re: the reuse of soils without the need for permits). Further comment seeking clarity from the Applicant as to what surveys have been undertaking in Fields SA51-53 in order to establish the impact of the cable route to the National Grid substation. Further comment opposing the working hours captured within the revised outline OEMP.	Other measures such as biosecurity measures and delivery of specific tool box talks, would be the responsibility of the Applicant and Principal Contractor secured by Requirement 11 in the 10 in the **Draft DCO [EN010158/APP/3.1.5]**. The information set out in paragraph 3.5.1 of the Outline Site Waste Management Plan which forms Appendix 1 of the **Outline CEMP [EN010158/APP/7.2.4]** provides an introduction and sets out the CL:AIRE code of practice and the definition of waste which should be used when reusing source segregated aggregate. Permits are not required for the reuse of soil as it is being reused it is not classified as waste. The Applicant has undertaken several baseline surveys to establish the impacts and to inform a robust assessment of the likely impacts of the cable route to the National Grid Substation through fields SA51 – 53. The working hours as detailed in the **Outline OEMP [EN010158/APP/7.3.4]** Monday to Friday would be between 7 am and 7pm which are standard working hours for this type of development with up to 24 permanent staff per day.
5.11.17	8, row 2 (ExA Question Q1.18.5 on Impact on soil ecosystems)	Response seeking clarification that estimates of impacts on soil ecosystems have taken into account removal of large volumes of topsoil and whether loss of carbon sequestration capacity has been included in calculations on the carbon footprint of the Proposed Development.	Large scale topsoil stripping across the site is not proposed as part of the construction process, and any soil stripping would be limited to areas such as access tracks, foundations and compounds, with the majority of land remaining as grassland. Furthermore, topsoil would be retained on site and reinstated according to the **Outline Soil Management Plan [EN010158/APP/7.7.3] [REP2-069],** therefore limiting impacts on soil ecosystems. Section 8.13.1 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]** details that any beneficial impacts of carbon sequestration (which may arise through vegetative cover and the temporary cessation of cultivation) have not been accounted for due to the inherent difficulty of accurately quantifying such measures. This has resulted in a conservative, worst-case assessment of outcomes.
5.11.18	8, row 4 (ExA Question Q1.19.12 on Amendments to the oCTMP (REP1-084))	Response noting the Applicant has not explained what checks would be made on contractor's adherence to speed limits. Further comment noting no response to the request for the remediation of footpaths on a rolling basis. Further comment noting there is no initiatives shared regarding improving safety for walkers, cyclists, equestrians and pedestrians on the construction traffic route. Further confirmation sought that the site will not be accessed from the Calvert Road/Three Points Lane junction.	The use of GPS trackers as detailed in Section 4.3 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** will be used to make sure that contractors adhere to speed limits**.** In addition, further speed check information and safety measures for non-motorised users are provided in Section 4.11 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**, in the section addressing pedestrian and cyclist use and equestrians**.** The measures in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**including the Staff Travel Plan are secured in the **Draft DCO [EN010158/APP/3.1.5]** and is a legal requirement for the speed monitoring measures described in the **Outline CTMP [[EN010158/APP/7.5.3] [REP2-065]** to be undertaken. The remediation of footpaths damaged by construction activities is catered for in Section 6.5 of the **Outline Rights of Way and Access Strategy [EN010158/APP/7.8.4]**. This includes ongoing maintenance as and when required. The routes used by all construction traffic is detailed in Section 2.1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. These do not include the Calvert Road/Three Points Lane junction. As explained above, construction traffic will be required to adhere to the measures and route set out in the detailed CTMP which must substantially accord with the Outline CTMP and which must be submitted to and approved by the relevant local planning authority in consultation with the local highway authority (see Requirement 13 of the **Draft DCO [EN010158/APP/3.1.5]**.

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5.11.19	8, row 5 (ExA Question Q1.20.8 on Location of energy projects in areas at risk of flooding)	Response noting an ongoing concern that the Applicant's reliance on desktop analyses and modelling fails to appreciate the true risk of flooding in the area. Further comment made regarding a lack of consideration of the Claydon Brook's tendency to overtop or the impact of soil-stripping on hydrology in an area where the capacity for ground infiltration is extremely low. Further comment that the cumulative impacts with other local electrical infrastructure projects requires a more detailed evaluation.	The Applicant considers that flood risk has been robustly assessed using proportionate, industry-standard methods, informed by site-specific data and consultation, and is not solely reliant on high-level desktop analysis. The assessment includes Claydon Brook, which has been subject to detailed hydraulic modelling, with the site layout designed to avoid areas of greatest risk wherever practicable is detailed in the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.4]**. Accordingly, the flood risk has been appropriately assessed. There will be very minimal soil stripping for the Proposed Development and where soil stripping is required, drainage will be managed by measures set out and secured in the **Outline Drainage Strategy [EN010158/APP/7.11.4]**. A detailed assessment on cumulative impacts with other developments has been undertaken and is presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037].**
5.11.20	11, paras. 1.4, 1.5, 1.6 and 1.10	Response that the Applicant sets out the importance of natural space, connecting blue and green infrastructure to enhance biodiversity, quality of space and attractive cycling and walking routes as key elements as their objectives directly relevant to human health, and this is agreed by the Parish Council, but that it is not clear to what extent they are realised in the Proposed Development. Response that self-reported health is influenced by the rural environment, access to the countryside and wildlife through a network of PRoWs, their tranquillity and dark skies. Response that the Health and Wellbeing Summary Statement does not appear to appreciate that this the comment at para 4.2.17 ('*Higher sensitivity (or susceptibility) is attributed to those living within view of the Proposed Development, as well as those engaged in outdoor pursuits for whom landscape experience is the primary objective')* applies to almost every resident in the villages surrounding the Proposed Development as well as large numbers from more distant locations.	The Applicant does recognise the importance of access and experience of the natural environment to residents, and notes that this applies more acutely to those residents who live in the local area, are more likely to use local PRoW/experience the local environment more readily and regularly. It is also recognised that access to physical recreation and enjoyment of the natural environment and its amenity are direct drivers / determinants of health and wellbeing – both in terms of mental and physical health and wellbeing. This is made clear at throughout the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) and specifically at paragraph 4.2.17. Several references are made to this direct health pathway, and how this is directly influenced in terms of sensitivity by the feedback received from the community through engagement and consultation to corroborate this. Stress and anxiety is recognised to be influenced by a lack of awareness or information about a project and planned construction activities – this is recognised at Section 3 of Annex A of the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** in-line with the application of guidance, and is mitigated through detailed engagement and consultation secured through management plans that enables engagement, agency and feedback to influence detailed mitigation plans, for example through the Community Liaison Group.

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		Response that stress and anxiety within a local population can be caused by a lack of awareness or information about a project and planned construction activities, and that this applies in this case.	
5.11.21	11, paras. 1.12 and 1.13	Response stating that all of the population should be considered vulnerable and sensitive receptors because of the dependence of local communities on access to the countryside as a key aspect of their health and wellbeing, acknowledging that vulnerable sub-populations have been noted by the Applicant including children and young people, older people, people with existing poor health and people employed in the agricultural sector.	The Applicant notes that, in accordance with appropriate best practice guidance, the **Health Effects Report** (**Annex A** to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) considers the effects of the Proposed Development on health and wellbeing at a population scale, and differential/disproportionate effects on sub-populations that may be more sensitive to change. The Applicant maintains that this approach is both appropriate and robust.
5.11.22	11, para. 2.1	Response that the working hours for the Proposed Development are an unacceptable intrusion on local communities. Further comment that the Health and Wellbeing Summary Statement fails to note that access to the Site would extend to one hour before and after the core times (i.e. 06:00 – 20:00) which is unacceptable.	Construction works would be undertaken during the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 12:00 on Saturday. Between 07:00 to 08:00 and 18:00 to 19:00 Monday to Friday and 07:00 to 08:00 on Saturdays, noisier activities (such as piling) would be restricted, depending on the construction activity proposed to take place and its proximity to sensitive receptors. No construction works would be carried out on Sundays or Bank or Public Holidays without prior agreement with Buckinghamshire Council as the host Local Planning Authority. Access to the Site would extend outside of the core working hours to manage construction traffic to the Site and avoid traffic impacts during the peak hours. Mitigation measures are set out and secured in the **Outline CEMP [EN010158/APP/7.2.4]** and **Outline CTMP [EN010158/APP/7.5.3]** **[REP2-065]** and Requirements 11 and 13 of the **Draft DCO [EN010158/APP/3.1.5]** to reduce impacts to the local community.
5.11.23	11, para. 2.2 to 2.7	**Noise** Response that paragraph 7.2.2 of the Health and Wellbeing Summary Statement ignores the value of tranquillity in the local environment and as well as the impact on residential amenity, changes to tranquillity would be a major deterrent for users of PRoWs. Further comment that the level of noise in the operational phase is highly intrusive	The Applicant recognises concern relating to noise during the construction and operational phases of the Proposed Development. A full assessment in accordance with relevant legislation, policy standards and thresholds and guidance has been undertaken within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** **[REP1-040]** and considered through a health and wellbeing lens in **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**. The assessment of effects presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** **[REP1-040]** has been informed by a baseline survey comprising multiple locations within the defined Study Area. The results of the noise surveys are provided within **ES Volume 4, Appendix 13.1: Baseline Noise Survey [EN010158/APP/6.4]** **[APP-127]**.

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		and a further deterrent to the use of PRoWs. Further comments that: • the Applicant acknowledges that "several residential properties would be adversely affected by noise at night" • many of the measures outlined in paras 7.2.12-7.2.18 are 'soft' in that they are not easily enforceable and the proposed physical measures are unproven. • refute the conclusion reached in paragraph 7.2.26 paragraph, and conclude that a majority of the local population would be affected; and • disagree with the conclusions of significance relating to noise effects at paragraph 7.2.28.	This includes an assessment on both residential and PRoW-based receptors, concluding that construction noise may change the experience of users of PRoW across and adjacent to the construction works. It could be expected that users of PRoW within or adjacent to the Order Limits may be subject to construction noise levels which exceed the typical pre-construction ambient noise levels. However, the construction activities affecting an individual route would often be localised, and the transitory nature of PRoW users would mean that they are not exposed to construction noise for an extended period. During the operational phase, no residential receptor would experience daytime and night-time lowest observed adverse effect level (LOAEL) exceedances as a result of noise associated with the Proposed Development. This is defined as when noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. It can slightly affect the acoustic character of the area but not such that there is a change in the quality of life. As such, while some users of PRoW may be deterred from using PRoW, the noise experienced by those using the PRoW would not be considered to cause a significant adverse health effect. Construction activity would be temporary, short-term and itinerant. In response to specific comments raised relating to noise and health: a) Without additional mitigation, there would be the potential for noise to translate into significant adverse effects on health and wellbeing for some receptors in some locations (6 representative residential locations), during some times of the day – this could result in both physical and mental health pathways being affected, if not addressed through additional mitigation. However – additional mitigation will be secured and implemented, with monitoring to ensure compliance, as described at paragraphs 7.2.12 to 7.2.18 of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** which would ensure no significant residual effects. b) Mitigation measures identified are not considered 'soft' and represent best practice in the meaningful reduction of noise. They are measures secured by management plans which are secured by relevant Requirements in the **Draft DCO [EN010158/APP/3.1.5]** and are therefore legally enforceable. c) The majority of the local population would not be affected – as set out in Section 7.2 of the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**, only 6 representative residential receptors have the potential to experience any exceedance of design thresholds relating to noise-related health effects, and this would be reduced below that level with additional mitigation which would ensure no significant residual effects. d) The Applicant is content that application of sensitivity and magnitude criteria have been applied appropriately to consider the assessment of noise effects to be non-significant in health terms. This is a position shared by Buckinghamshire Council, as set out in the Council's **Responses to Examining Authority's first written questions (ExQ1) [REP2-090]** which sets out that: "*Buckinghamshire Council broadly agrees, on the basis of the Health Effects Report at Annex A [REP1 -056], that for the regulated physical health pathways of air quality, noise and vibration, traffic and access, land contamination and operational safety, no significant residual adverse effects are predicted following mitigation, subject to the delivery of the proposed design measures, DCO requirements and management plans (as amended)*"

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5.11.24	12, para. 3.2	**Visual Amenity (PRoW)** Response noting rejection of the 'not significant' assessment of impact on other elements of the local road and PRoW network in the Health and Wellbeing Summary Statement, noting that the nature of a network is that roads and PRoWs are linked and experienced in a dynamic sense, not limited to a single viewpoint, so acceptance of significant effects in one area applies across the board.	The Applicant does not consider that residual significant adverse effects on viewpoints on 6 groups of PRoWs (representing 30 PRoW) across 96 PRoWs within the Community Study Area can be translated to a wider significant adverse effect on the network as a whole. As demonstrated in the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**, for the vast majority of locations used for recreational activity, there would not be a significant change to visual amenity. Effects remain localised, and are itinerant and transitory which are not experienced on the majority of the network.
5.11.25	12, paras. 3.4 and 3.5	**Visual Amenity (Residential)** Comment that it is difficult to understand the rationale for the conclusion at 7.3.27 that there are "no significant effects on residential properties and their inhabitants" when an existing view of open countryside from a property is transformed into an industrial site. Further comment that the effect on visual amenity at all stages would be "Moderate Adverse and potentially Significant" underestimates the true impact.	**ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** assesses potential effects on residential properties specifically, which are summarised in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2] [REP2-029]**. While a small number of residential receptors would experience significant adverse effects, the assessment concludes that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development. As such, at a population scale, it is reasonable to conclude that there would be no significant health effect on residential property and their inhabitants. Notwithstanding this, the Applicant recognises that the wording suggests that no individual property should experience significant effects, which is contradictory to the conclusions of the Residential Visual Amenity Assessment – as such **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** has been updated at Deadline 3 to reflect this. This does not alter the overall conclusion of significance. The Applicant has considered the sensitivity, magnitude and significance criteria in-line with ISEP guidance to identify the potential for significant determinants of health to be affected at a population scale, which makes a clear assessment (from paragraph 7.3.22 of Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**) of the scale of significance in health terms.
5.11.26	13, para 3.6	**Traffic Transport and Access (Enhancement)** Comment that, when considering changes in traffic, transport and access during construction and decommissioning, it is not a defensible position to state that(paragraph 7.4.13) "…*before additional mitigation during the operational phase, there is likely to be an overall enhancement of accessibility within and*	The Applicant considers that during the operational phase, there would be an objective improvement in community access through the provision of new permissive paths that provide additional recreational and access routes between and within communities. Details of such routes and their purpose and justification are set out within the **Outline RoWAS [EN010158/APP/7.8.4]** (and secured by Requirement 16 of the **Draft DCO [EN010158/APP/3.1.5]**) and the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018].** The wider assessment within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** makes it clear that this conclusion relating to community access is notwithstanding the residual significant adverse effects relating to visual amenity on existing PRoW.

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		between residential areas and communities and their facilities, which is likely to contribute positively towards the determinants of physical and mental health (notwithstanding effects relating to recreational use of PRoW, which is considered in terms of landscape and visual amenity…".	
5.11.27	13, para 3.7	**Traffic Transport and Access (Scope)** Comment that scoping out the implications of the proposed development on the motorised highway removes proper evaluation of fear and intimidation of motorised and non-motorised users of country lanes in the face of greatly increased traffic flows, especially HGVs, and this ignores damage to roads and verges and the potential for large numbers of vehicles to use non-designated transport routes through the villages.	The Applicant disagrees with this statement and considers that effects on motorised and non-motorised users of country lanes (including with respect to the evaluation of fear and intimidation) has been robustly and appropriately assessed. The traffic effects on non-motorised users of country lanes have been considered and reported on in in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** Fear and intimidation effects are considered in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].** The routes used by all construction traffic is detailed in Section 2.1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** and secured by Requirement 13 of the **Draft DCO [EN010158/APP/3.1.5]**. These do not include the routes through the villages to the north of the A41 corridor. Adherence to the construction traffic route will be enforced through the use of GPS trackers, signs on HGV and contractual obligations, as well as a robust complaints procedure, as set out in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** includes various measures to address the points noted, including (Section 4.7) a road Wear & Tear Agreement and (Section 4.11) measures relating to pedestrian, cyclist and equestrian users. The **Outline RoWAS [EN010158/APP/7.8.4]** also provides extensive details relating to non-motorised users within the Order Limits.
5.11.28	13, para. 4.1	**Socio-economics** Response noting that it is a flawed and disingenuous for the Health and Wellbeing Summary Statement to conclude that tenant farmers / the farming would be not be adversely affected because of there being financial or land-swap agreements in place to limits effects on the viability of agricultural and non-agricultural businesses. Further comment noting the assessment of the impact of the health and wellbeing of local tenants farmers should conclude that the effects are major adverse, highly significant.	The assessment within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** recognises the high sensitivity of the agricultural sector, its employees and tenant farmers in particular. However, the Applicant is content that, through detailed engagement, negotiation and amendment to the Proposed Development, all affected parties have been provided with information, support, access to mitigation, and financial and/or land-based compensation such that the viability of operations is not affected. The provisions far exceed the expected standards – for example where Heads of Terms for replacement land provided in land swaps far exceed the provisions of compensation under the Agricultural Holdings Act 1986. As such, based on the application of standard sensitivity and magnitude criteria across guidance set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] [REP2-033]** and **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]**, a conclusion of no significant residual health and wellbeing effects on tenants farmers is appropriate.

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5.11.29	13, para. 5.1	**Major Accidents and Disasters** Response stating that the Applicant asserts that the risk of battery failure, and hence the risk to the population, is very low and that, based on assumptions regarding prevailing winds, that in the event of a thermal runaway, few receptors would be at risk of toxicity. Comment that the fact that the Applicant's assessment uses prevailing winds from far removed monitoring stations makes East Claydon Parish Council sceptical of the Applicant's conclusions.	As the High Wycombe station was used within the original **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**), the data presented in the ADMS Gaussian plume dispersion model study (using RAF Benson data) varies with this. As the High Wycombe meteorological station stopped monitoring in October 2022, and as both High Wycombe and RAF Benson are at similar distances south of the Site, it was judged most appropriate to use RAF Benson (see full justification within **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**). Please refer to ref. 5.5.8 for detailed response on the use of prevailing winds and monitoring stations. As the High Wycombe meteorological station stopped monitoring in October 2022, and as both High Wycombe and RAF Benson are at similar distances south of the Site, it was judged most appropriate to use RAF Benson (see full justification within the **BESS Plume Assessment Summary [EN010158/APP/7.13.3]**). The Applicant maintains that its assessment of the risk of battery failure and a thermal runaway event for the Proposed Development is both accurate and robust.
5.11.30	13 and 14, para. 6.1	**National Health Implications** Response stating that the Proposed Development presents a highly significant national (potentially international) health risk through possible impacts on the Preston Farms/TCS Biosciences operation, threatening the supply of critical diagnostic and other reagents, a risk which has received little attention from the Applicant.	The Applicant points to the response provided for under **Ref. 5.5.5** whilst also reiterating that **Appendix 1** to the **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]** has been prepared to provide a single source of responses to the matters and issues raised by Preston Farms Ltd and TCS Biosciences Ltd. This Appendix sets out the Applicant's current understanding of the Preston Farms operation, the potential impact of the Proposed Development on Preston Farms / TCS Biosciences, and steps taken to mitigate them. The Applicant recognises the importance of the operation undertaken by TCS Biosciences and, therefore, has consulted with this operator during the pre-application period, and amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses, which is reported in the ES. This has resulted in the assessment within the ES concluding non-significant residual effects on Preston Farms Ltd and TCS Biosciences Ltd. Therefore, the Applicant does not consider that the Proposed Development gives rise to/or places any unacceptable risk to, or unacceptable interference with, human health and public safety. This is concluded within the **Planning Statement [EN010158/APP/5.7.3] [REP1-016]** and, accordingly, the Applicant considers that the CNP presumption applies to the Proposed Development. The Applicant considers that were the non-significant residual effects to manifest, there is no evidence to suggest that they would jeopardise the future of the business, and also no evidence that it would have a measurable impact on the functioning of the NHS. In order to address uncertainty, the Applicant has developed a suite of precautionary, flexible and responsive management plans that are secured and allow for: the design of bespoke measures; the monitoring of potential effects, and the management and correction of such effects if they arise.
5.11.31	14, paras. 7.1 to 7.3	Response stating false logic is applied to the cumulative assessment's assumption that each cumulative project assessed will have its own mitigation in place. Further	The Applicant has provided a detailed cumulative assessment of effects on visual amenity together with the replacement National Grid East Claydon Substation in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044]**, **Section 17.6.9 to 17.6.112**.

Ref.	Page, Reference and Written Question (if applicable)	Summary Position	Applicant's Response
		comment stating that, notwithstanding mitigation measures, each project carries a risk of accident / adverse incidents and so, together, there is a cumulative risk. Further comment noting the cumulative assessment ignores effects on visual amenity together with the replacement National Grid substation with particular regard for visual amenity and noise. Further comment noting disagreement with the Applicant's assessment of cumulative transport impacts locally. Further comment that the whole road network needs to be considered and that the Applicant would apply no constraints on non-HGV traffic associated with the Proposed Development and that a small disruption can lead to major impacts across the network due to the limited alternative routes in the area.	The routes used by all construction traffic is detailed in Section 2.1 of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. Cumulative impacts only exist on shared routes and as such, the assessment has considered cumulative impacts where they exist. The use of the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]** and the Staff Travel Plan is secured in the **Draft DCO [EN010158/APP/3.1.5]** and is a legal requirement for traffic to use the routes described in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. The use of the **Outline CTMP [EN010158/APP/7.5.2] [REP1-084]** and the Staff Travel Plan is secured by Requirement 13 of the **Draft DCO [EN010158/APP/3.1.5]**. That Requirement states that a detailed Construction Traffic Management Plan which is substantially in accordance with the Outline CTMP must be submitted to and approved by the relevant planning authority in consultation with the local highway authority prior to the commencement of any part of the Proposed Development. All construction works must be carried out in accordance with the detailed Construction Traffic Management Plan (including the Staff Travel Plan). Accordingly, it is a legal requirement for construction traffic to use the routes described in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. Given this legal control of access routes, the Applicant maintains that its cumulative effects assessment in **Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]** is appropriate and robust and stands by its conclusion that there will no significant cumulative effects on the road network as a result of construction traffic.
5.11.32	14 and 15, paras. 7.4 to 7.7	Response noting disagreement with paragraph 8.5.13 of the Health and Wellbeing Summary Statement and further comment stating that the conclusion displays a lack of understating or interest in the farming community. Further comment stating agreement with paragraph 8.6.6 of the Health and Wellbeing Summary Statement that there would be 'a large, adverse significant effect from the six cumulative developments on soil' with further comment noting the conclusion in paragraph 8.7.1 (that the Proposed Development and cumulative schemes are not considered to result in additive effects that would combine to increase the level of effect on individual receptors to a significant scale across most relevant determinants of health) is not supported by data or examination of the Applicant's proposals.	As set out above at **Ref. 5.11.29**, the Applicant recognises the sensitivity and has considered that agricultural workers and tenants are highly sensitive to change that may result in health implications. However, the Applicant is content that through detailed engagement, negotiation and amendment to the Proposed Development, that all affected parties have been provided with information, support, access to mitigation, and financial and/or land-based compensation such that the viability of operations is not affected. The provisions far exceed the expected standards – for example where Heads of Terms for replacement land provided in land swaps far exceed the provisions of compensation under the Agricultural Holdings Act 1986.

6. Responses to Other Deadline 2 Submissions

Table 6.1: Buckinghamshire Council [REP2-089]

Ref.	Page and Reference	Summary Position	Applicant's Response
6.1.1	2, row 2 5, row 1 7, row 1 13, row 1	Comment noting maintained concern with the broad drafting of Articles 40 and 41 in the draft DCO. Further comment that these articles are not tied to a clearly identified schedule of trees likely to be affected. Further comment that the powers in the draft DCO are not matched by a robust arboricultural evidence base or by an Outline Arboricultural Method Statement. Further comment that, in the absence of an Outline Arboricultural Method Statement, there is limited confidence in the arboricultural components of the other management plans.	Article 40 (Felling or lopping of trees and removal of hedgerows) and Article 41 (Trees subject to tree preservation orders) are based on model provisions which have been adopted in numerous made DCOs. The Applicant considers that the drafting is appropriately controlled, including by how Article 40 expressly links to Schedule 12 (Hedgerows to be removed) to the maximum extents shown on the **Vegetation Removal Parameters** (which is Appendix 3 of the **Outline LEMP [EN010158/APP/7.6.3]** **[REP2-067]**). Schedule 12 is divided into Part 1 (Removal of hedgerows) and Part 2 (Removal of important hedgerows). Article 40(4) clarifies that the power is to remove hedgerows specified in Schedule 12, to the extent set out in the **Outline LEMP [EN010158/APP/7.6.3]** **[REP2-067]** approved pursuant to Requirement 7 in Schedule 2. The Applicant acknowledges the importance of ensuring a robust and reliable arboricultural evidence baseline. All arboricultural features were ground-truthed, ensuring no reliance on aerial data alone. Where discrepancies arose between datasets (e.g. canopy extent or feature classification), these were resolved in favour of site-based observations. Any gaps in data were addressed through site verification and professional interpretation, ensuring a complete and coherent dataset. A detailed response on the approach to the arboricultural baseline and methodology is set out in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13]** **[REP2-087]**. As detailed under **Ref. 3.32** of the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]** **[REP2-085]** an Arboricultural Method Statement (AMS) will be prepared following detailed design, prior to any construction. The **Outline CEMP [EN010158/APP/7.2.4]** sets out measures to protect trees including a commitment that tree protection fencing will be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors.
6.1.2	2, row 3	Comment noting that Buckinghamshire Council have requested the Applicant to consider Bernwood farmhouse in the cultural heritage assessment.	The Applicant notes that Bernwood Farmhouse has been recently requested to be considered within the assessment of effects on the historic environment. This will be included in an update to **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2]** **[REP2-046]** at Deadline 4.
6.1.3	2, row 4	Comment noting updates to the biodiversity chapter with regard for arboricultural matters. Further comment noting a need for clearer arboricultural evidence and methodology, including confirmation of full ground verification, consistent treatment of woodland as woodland where appropriate, and a more robust, feature-specific approach to buffers, retained veteran trees and future veteran potential.	The arboricultural baseline was established through the integration of drone-derived topographical data and a ground-based arboricultural survey in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction as stated within paragraphs 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]** **[REP2-044]**. Trees have been recorded as individuals (prefix T) or as groups (prefix G) within the survey data tables within Annex A of **ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2]** **[REP2-044]** in line with the BS 5837:2012 definition a group as: *"trees that form cohesive arboricultural features either aerodynamically (e.g. shelter), visually (e.g. avenues or screens) or culturally including for biodiversity (e.g. woodlands, parkland or wood pasture)".* Tree group descriptions and classifications

Ref.	Page and Reference	Summary Position	Applicant's Response
			are provided in Annex A, for example G70 – woodland belt, G71–G72 – woodland, G79 – woodland and G86 – woodland, and so on. These examples demonstrate that groups have been consistently identified and described within the AIA in accordance with standard arboricultural practice. Section 3.3 of the AIA further describes the methodology of tree groups. Appendix 3 of the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067] 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. The buffer strategy is feature-specific and evidence-based, informed by individual tree constraints (including Root Protection Areas (RPAs) and canopy spreads) and the presence of higher-value features. Veteran and potential veteran trees have been identified with veteran trees afforded enhanced protection, with buffers applied in line with relevant standing advice.
6.1.4	3, row 2	Comment welcoming the strengthening of mitigation measures with regard for noise and vibration. Further comment that further assurances will be required through the detailed Operational Environmental Management Plan, in accordance with the outline OEMP.	The Applicant notes this comment. This is secured in Requirement 12 of the **Draft DCO [EN010158/APP/3.1.5]**. This notes that the detailed Operational Environmental Management Plan must be substantially in accordance with the **Outline OEMP [EN010158/APP/7.3.4]** and will be submitted to and approved by the relevant planning authority in consultation with the Environment Agency and Natural England.
6.1.5	3, row 3 6, row 1 13, row 1	Comment noting that cumulative arboricultural effects, particularly with regard for ancient woodland and woodland edge pressure, is not sufficiently resolved. Further comment noting the overlap with HS2 mitigation on land adjacent to Decoypond Wood which suggests a double use of the land.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2]** [REP1-044] fully assesses the potential for intra cumulative impacts to occur from the Proposed Development and for inter cumulative from other developments including High Speed 2 (HS2) and East West rail in combination with the Proposed Development. Where the assessment has highlighted that there is the potential for cumulative effects, this has been flagged. It is acknowledged that there has been significant construction activity and disruption caused by large numbers of contractors, vehicles and plant movement as well as unprecedented habitat change due to HS2 for several years. 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 the Applicant would submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the **Outline LEMP [EN010158/APP/7.6.3]** [REP2-067].

Ref.	Page and Reference	Summary Position	Applicant's Response
6.1.6	4, row 3	Comment noting Buckinghamshire Council is not satisfied with the Applicant's assessment of human health. Further comment noting these concerns are raised in Buckinghamshire Council's Local Impact Report Addendum. Further comment that the human heath effects have not been added to align in the Non Technical Summary.	The Applicant has provided a response to Buckinghamshire Council's prevailing concerns relating to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** in Part 1 of this submission. **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]** has been updated at Deadline 1 **[REP1-056]** (to include the Health Effects Report as Annex A) and then at Deadline 2 **[REP2-050]** (to include information provided by Waddesdon Surgery to make more explicit the sensitivity of sub-populations).
6.1.7	4, row 5 7, row 1 5, row 1	Comment noting concern that the DCO Application does not detail when the proposed site fence, as referenced in the Arboricultural Impact Assessment, would be erected. Further comment noting that this fence is referenced as a tree protection measure but its ability to serve as such depends on when it is installed. Further comment noting proximity of proposed works to a group of black poplar to which Buckinghamshire Council consider the Applicant's assertion that these trees would remain unaffected by the Proposed Development requires a detailed Outline Arboricultural Method Statement to conclude this.	The **Outline CEMP [EN010158/APP/7.2.4]** sets out measures to protect trees including a commitment that tree protection fencing will be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors. An indicative tree protection fence alignment is shown as a purple polyline on the plan at Annex 5 of the **Outline CEMP [EN010158/APP/7.2.4]** and commits to it being installed before any site mobilisation works such as installation of Site offices or any ground works and before any construction begins including Site fencing. This is secured by Requirement 11 in the **Draft DCO [EN010158/APP/3.1.5]**. This alignment of tree protection fencing will need to be reassessed during the detailed design stage to reflect any new changes in layout, provide linear measurements, and ensure trees can be protected adequately. There is therefore no period during which retained features would be unprotected. The timing and specification of both temporary and permanent fencing will be secured and clearly defined within the site-specific Arboricultural Method Statement and associated control documents at detailed design stage. Group G98, which is the only group suspected to be black poplar, will remain unaffected by works and will be fenced to beyond its projected RPA. The Solar PV modules and boundary fencing would be realigned at the detailed design stage to ensure the two trees within the group can remain unaffected by works as they will be fenced beyond its projected RPA. This is also detailed in, and secured by, the **Outline CEMP [EN010158/APP/7.2.4]** and Requirement 11 in the **Draft DCO [EN010158/APP/3.1.5]**. The Applicant considers that this mechanism is sufficient for ensuring the appropriate protection of Group G98 and does not agree that an additional Outline Arboricultural Method Statement is necessary.
6.1.8	5, row 1 6, row 1	Comment noting the Applicant's general deferment of detailed arboricultural matters to the detailed design stage means that confidence in assessments to date are undermined. Further comment noting ongoing concern with the robustness of the Applicant's arboricultural baseline.	The Applicant has considered arboricultural matters throughout the design process and has secured mitigation measures in the **Design Commitments [EN010158/APP/5.9.5]** and **Outline CEMP [EN010158/APP/7.2.4]** to avoid and reduce impacts to trees, which is a standard approach to the assessment. These include the below measures: • Design Commitment C7: Principal components of the Proposed Development will avoid root protection areas of trees and hedgerows as far as reasonably practicable, except where a hedgerow crossing is required for access tracks and/or cable routes. • A site-specific Arboricultural Method Statement (AMS) will be compiled, detailing the exact location and nature of protective fencing, tree pruning, signage, timings and methods of works and other

Ref.	Page and Reference	Summary Position	Applicant's Response
			protection measures. All site operatives must be made aware of the nature of the protection detailed in the AMS and it will remain in place throughout construction. • It is proposed that tree protection fencing be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors. • A indicative tree protection fence alignment is shown as a purple polyline on the plan at Annex 5 and must be installed before any site mobilisation works such as installation of site offices or any ground works and before any construction begins. This alignment of tree protection fencing will need to be reassessed during the detailed design stage to reflect any new changes in layout, provide linear measurements, and ensure trees can be protected adequately. • Group G98, suspected to be black poplar, will remain unaffected by works and will be fenced to beyond its projected RPA. These measures outlined in the **Design Commitments [EN010158/APP/5.9.5]** and **Outline CEMP [EN010158/APP/7.2.4]** are adequately secured through the **Draft DCO [EN010158/APP/3.1.5]**. The Applicant will engage with Buckinghamshire Council at the detailed design stage and will submit the detailed Construction Environmental Management Plan to them for approval. The Applicant respectfully disagrees with the comment on the robustness of the arboricultural baseline. All arboricultural features were ground-truthed, ensuring no reliance on aerial data alone. Where discrepancies arose between datasets (e.g. canopy extent or feature classification), these were resolved in favour of site-based observations. Any gaps in data were addressed through site verification and professional interpretation, ensuring a complete and coherent dataset. A detailed response on the approach to the arboricultural baseline and methodology is set out in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087], see Q1.7.23**.
6.1.9	12, row 2	Comment requesting that the outline CTMP is reviewed against the Arboricultural Impact Assessment to ensure the full assessment of highway, verge, passing place, widening and access works with potential to affect trees is consistent. Further comment stating that there is uncertainty as to whether all tree, hedgerow and woodland-edge effects associated with traffic management and highway works have been fully identified and assessed from the outset.	**ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044]** was updated at Deadline 2 to ensure consistency with the trees, hedgerows and woodland edge effects associated with traffic management and highway works outlined in the **Outline CTMP [EN010158/APP/7.5.3] [REP2-065]**. Further detail on specific changes has also been provided within the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**.
6.1.10	12, row 3 13, row 1	Comment noting that the outline LEMP's detailing of arboricultural matters does not do away with the need for an Outline Arboricultural Method Statement. Further comment that arboricultural elements of the outline LEMP require a supporting Outline Arboricultural Method Statement to properly secure appropriate measures.	As set out at response reference 3.32 of the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085]**, 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/7.2.4]** and by Requirement 11 of the **Draft DCO [EN010158/APP/3.1.5]**. 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

Ref.	Page and Reference	Summary Position	Applicant's Response
		Further comment noting benefits of including an Outline Arboricultural Method Statement to support the Proposed Development.	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/7.2.4]** and secured within the **Design Commitments [EN010158/APP/5.9.5]**. 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.
6.1.11	14, row 2	Comment noting the Applicant's updates to the outline SMP is not a secure response to Buckinghamshire Council's concerns.	The Applicant will continue engagement with Buckinghamshire Council to discuss their concerns.
6.1.12	14, row 3	Comment disagrees with the Applicant in that the revised footpath diversion for the deleted and created network north west of Pond Farm in Parcel 1 is not considered the best layout possible. Further comment noting that the alignments do not reflect the desire lines proposed by Buckinghamshire Council in November 2025. Comment noting difficulty in interpreting the pink and turquoise lines on sheet 1 of the Streets, Rights of Way and Access Plans.	The Applicant considers that there is benefit in the proposed arrangement for those undertaking circular walks from Steeple Claydon, providing a link between footpath MCL/21/1 north of Calvert Road and the new footway created by HS2 along Addison Road. It has been agreed with Buckinghamshire Council to update the **Design Commitments [EN010158/APP/5.9.5]**, to include a design commitment that the diverted PRoW in Field B5 (SCL/12/2 and SCL/13/1) will not be fenced during operation (including maintenance), to address their concerns on this matter. In relation to the interpretation of the pink and turquoise lines on sheet 1 of the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006]**, the pink lines indicate where works may occur along roads and/or PRoW during the construction phase and would not be included on the definitive map. The turquoise lines are those anticipated to be included on the definitive map. Paragraph 8 in Section 3 of the **Draft DCO [EN010158/APP/3.1.5]** explains what 'Street Works' cover and Schedule 4 of the **Draft DCO [EN010158/APP/3.1.5]** provides a list of the 'streets' anticipated to be subject to 'Street Works', along with a description of the anticipated extent of works.
6.1.13	15, row 2 16, row 1 17, row 1	Comment welcoming the updated Draft Archaeological Management Strategy. Further comment noting the updates requested by Buckinghamshire Council to the Draft Archaeological Management Strategy and final comment noting that the Applicant has reached agreement with Buckinghamshire Council on the scope of updates to the Draft Archaeological Management Strategy.	The Applicant welcomes the positive engagement had with Buckinghamshire Council on the **Draft Archaeological Management Strategy [EN010158/APP/7.10.2] [REP1-094]** and welcomes the agreement of this document as set out within the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.3]** revision which was submitted at Deadline 2.

Ref.	Page and Reference	Summary Position	Applicant's Response
6.1.14	17, row 2 18, row 1	Comment noting that some excavation would still be required to create connections between drainage features in buffer strips to woodlands. Further comment that these buffers should remain development free and that, without an Outline Arboricultural Method Statement, there is no certainty on how buffer areas would be protected.	**ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044]** has assumed buffer areas will remain free from built development and protected from adverse effects, with their primary function maintained. Detailed measures to safeguard these areas are secured in the **Outline CEMP [EN010158/APP/7.2.4]** etc, including the use of appropriate construction techniques (e.g. hand digging, no-dig methods where required), arboricultural supervision, and protection of Root Protection Areas (RPAs). Further detail on the approach to tree protection and mitigation is detailed in **Ref. 6.1.10** above.
6.1.15	18, row 2 19, row 1	Comment noting that the Applicant's Bat Technical Study has not considered the relationship between insect communities and sheep and that this additional information has not addressed Buckinghamshire Council's concerns that solar farms may displace bats for reasons which are not yet understood. Comment that the placement of panels in the relevant fields therefore could make them unsuitable for bats to forage, even if livestock are present. Further comment noting deficiencies in a detector's ability to detect bat activity in larger open areas and expressing concerns with that aspect of the Bat Technical Study methodology. Comment that the Council does not consider that study is suitable to inform decision making and maintains that Bechstein's bats do forage in open fields and in particular pasture grazed by cattle.	The **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** submitted at Deadline 1 presents a literature review that indicates there may be some benefits associated with sheep grazing under solar PV modules contributing to an overall greater insect biomass for foraging bats but has not attempted to reach any conclusions other than this. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** has acknowledged the potential displacement of bats by solar panels and has reached a conclusion of a potentially significant residual effect on Bechstein's in recognition of this uncertainty. Limitations with regards acoustic detectors are acknowledged within **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** (see **page 23-26**), but **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.4]** has used all survey information available and Natural England has agreed that additional survey effort for bats would not be useful and that the Applicant's data in combination with The Bernwood Population of Bechstein's Bats - A Non-Technical Summary of the Evidence report (Natural England, 2024) and additional information from HS2 (see **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025]**) is sufficient to inform the baseline and assessment. Finally, the **Outline LEMP [EN010158/APP/7.6.3] [REP2-067]** sets out a draft bat monitoring strategy with an acknowledgement of the limitations of acoustic data and that the final monitoring strategy is likely to be in partnership with organisations such as HS2 using monitoring techniques other than just acoustic detectors. Accordingly, the Applicant considers that the **Bat Technical Study [EN010158/APP/8.5] [REP1-105]** is sufficiently robust to inform consideration of the DCO Application.

Table 6.2: Christine Mitchell [REP2-131]

Ref.	Page and Reference	Summary Position	Applicant's Response
6.2.1	1, para. 2	Comment stating that the Proposed Development would damage the ground and urbanise views over the land. Further comment noting that the land would become 'brownfield', that tourism would diminish, good farming land would be lost, there would be a devastating effect on nature and traffic would make cycling more dangerous.	The Applicant refers to Refs. 10.1.3 and 10.2.1 of **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.
6.2.2	1, para. 3	Comment pointing to alternative locations for solar, such as carparks and rooftops.	The Applicant refers to Refs. 1.2.12 and 1.3.1 of **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.
6.2.3	1, para. 4	Comment noting Buckinghamshire Council's intention to promote the Bernwood Forest as an area for people to visit for recreation.	The Applicant refers to Ref. 9.1.41 of **Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]**.

Appendix 1

Application Document Ref: EN010158/APP/8.18
Planning Inspectorate Scheme Ref: EN010158

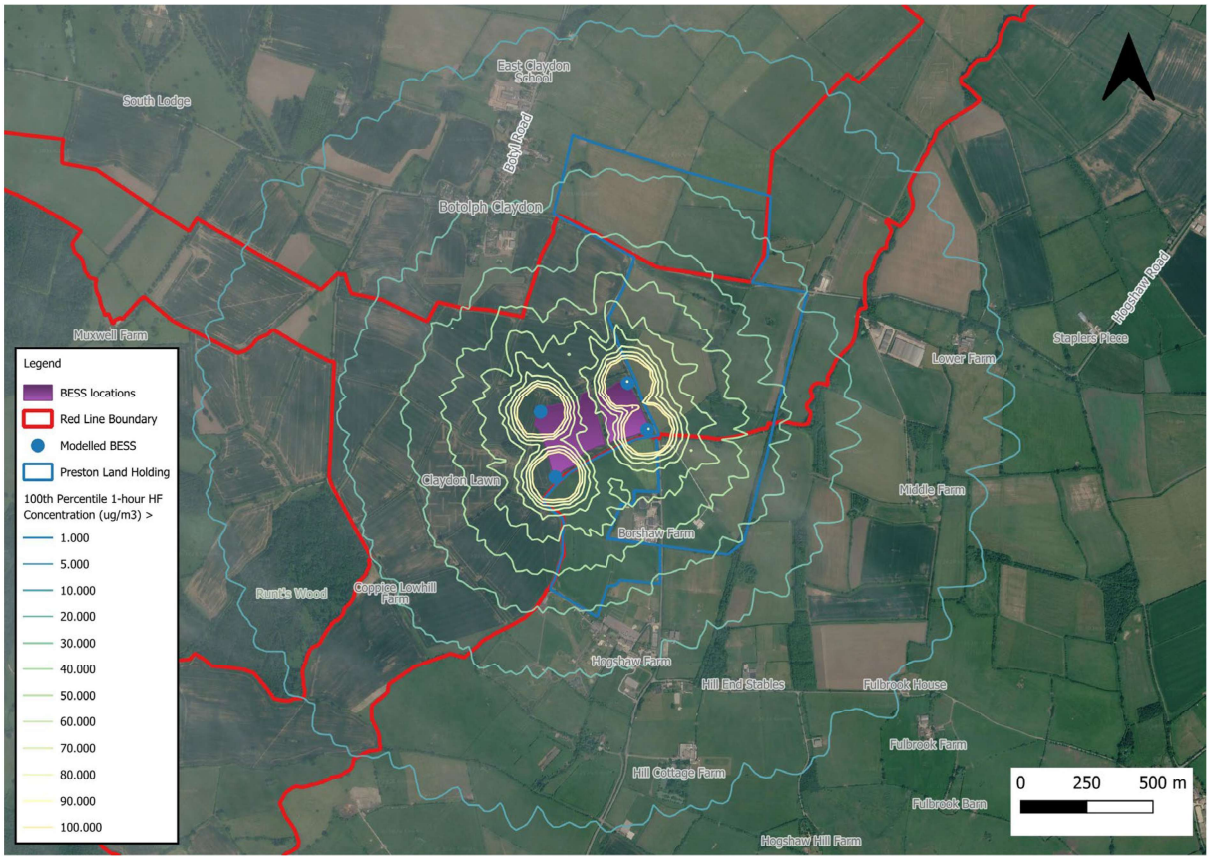

Figure 1- 100th Percentile 1-hour HF Concentration (ug/m3)

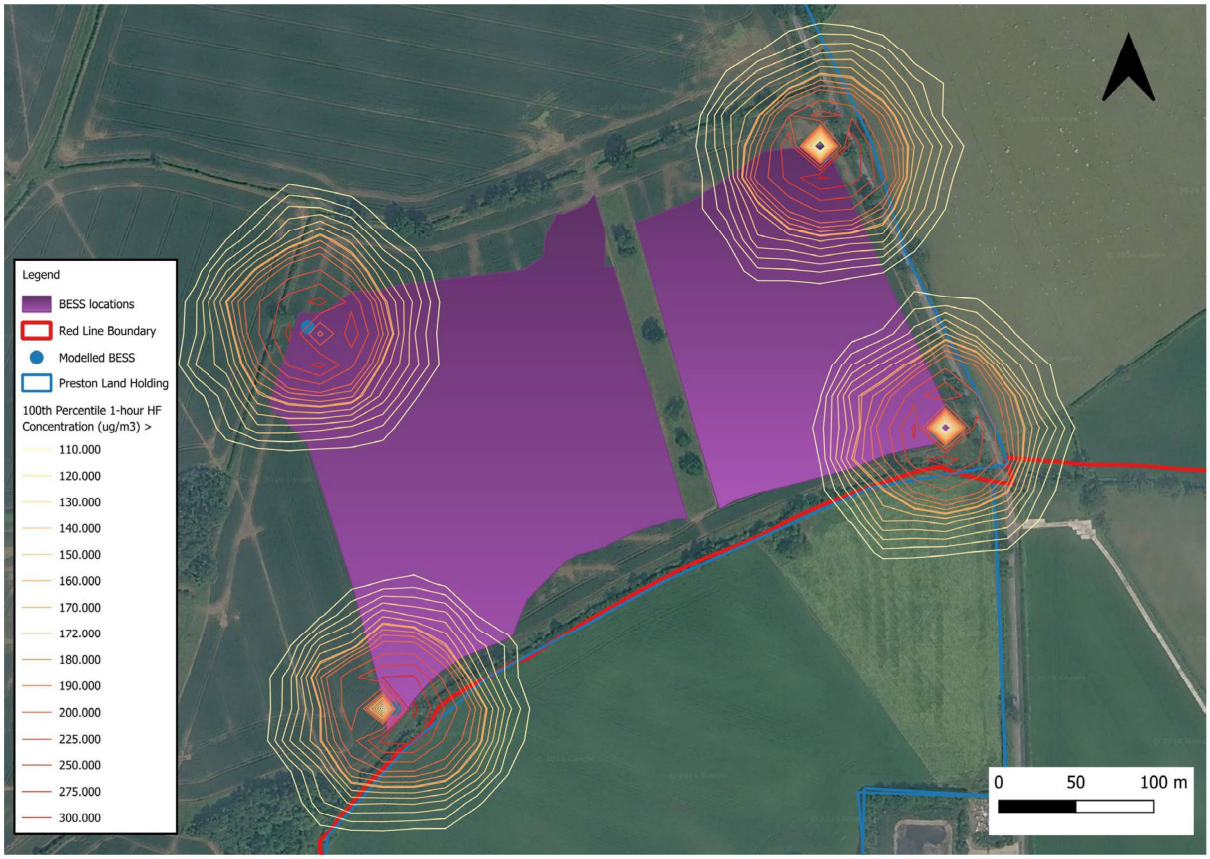

Figure 2- Zoomed in 100th Percentile 1-hour HF Concentration (ug/m3)

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

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Planning Inspectorate Scheme Ref: EN010158