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Rosefield Solar Farm DCO Examination

Preston Farms Ltd and TCS Biosciences Ltd (PFL/TCS)

Submission and evidence following ISH1-2 to inform and assist the Examining Authority – for Deadline 3

Introduction and summary

1. Further to our written representations (**REP1-133**), PFL and TCS have submitted answers to the ExA's questions (ExQ1) at Deadline 2 (**REP2-107**), and provided further information during ISH1-2, all of which we hope has been of assistance to the ExA.

2. However, what we have heard from the Applicant at ISH1-2, on top of the Applicant's Deadline 2 material, in particular the Applicant's response to the written representations (WRs) (**REP2-086**), which includes an "Appendix 1" specifically responding to our WRs, and the Applicant's responses to ExQ1 (**REP2-087**), mean we are more concerned than ever that the Applicant has not only failed to correctly assess the impacts on us and address our concerns, including follow the mitigation hierarchy, but still does not really understand us and why the Proposals are so damaging to us. This is despite us having gone to considerable lengths to engage and inform the Applicant over many years.

3. We feel the Applicant is essentially paying lip-service to our concerns, purporting to address them with inadequate primarily management/liaison-based mitigation, rather than making the substantive changes to the present Proposals that would be appropriate. It is also particularly disappointing to hear the Applicant seeking to hide behind the NDA as the reason for its failure to assess us correctly: that is a red herring.

4. Over the lifetime of this project, the Proposals have encroached significantly further into our holding. The Applicant's attempts to assert otherwise are not credible. We know what we were told when we were first approached about the proposals in 2022, and it is shown clearly on the 'site layout' plans in the ES Wintering Birds and Bat Surveys,[1] which stand in contrast to the airbrushing of this part of the history elsewhere in the ES. The shift from a smaller Parcel 3 tightly centred on the East Claydon substation, to the present Proposals Parcel 3 that stretches down to take the heart of our Holding, does not 'mitigate' the impact on us, but the opposite.

5. The fact of the first, subsequently airbrushed, option, shows that there is (a) at least one reasonable alternative the Applicant considered but has not presented or explained in the ES for the purposes of the EIA Regulations; (b) at least one alternative to be considered when applying compulsory acquisition principles (see our WR, but in short part of the 'compelling case' is an absence of alternatives);[2] and (c) there is a

[1] **APP-089** pp27-28 (Figures 1 and 2, including 'site location' red line plans), see also **APP-088** pp18, 21 (Figure 1, Figure 2.3, including 'site location' red line plans). Then see **APP-047** (reasonable alternatives considered), in particular section 4.7, for the complete lack of acknowledgement of this within the purported explanation of the design evolution.

[2] Note that in terms of the ES and reg. 14 of the EIA Regulations, that the Applicant considered this option, and that it is reasonable (the test is, ultimately, objective), is clear from: (a) the fact it would plainly meet the project's objectives, even taking the Applicant's definition of those objectives in **APP-**

further factor going to 'unacceptable' risk/interference with health/safety under EN-1 (2023) 4.2.15.

6. That the Applicant has significantly increased the impact on us from that original option explained to us in 2022, underlines our status as an afterthought.

7. The Applicant is also now leaning heavily on the fact that our landlord, the Claydon Estate, has issued us with a notice to quit under the farm business tenancy on which we hold various of the fields at issue, including but not limited to E23,[3] a move that is plainly a consequence of the DCO Application.

8. So as a result of the DCO Application we are now under still greater threat.

9. To our huge frustration, the Applicant refuses to acknowledge that its Proposals in their current form are incompatible with our operations, and present an unacceptable risk to and interference with a 60-year old operation that is genuinely of critical importance to national (and international) public health and safety (EN-1 4.2.15).

10. As ISH1 has demonstrated, the Applicant is quite willing to run the risk of biosecurity breach and stressing of our donor animals in order that it can more conveniently construct its project, and then operate it.

11. One of the many unhappy contributions from the Applicant during ISH1 was the confirmation that the Applicant intends to use field E23 as a main construction compound. That will make matters much worse.

12. Faced with the Applicant's failure (or refusal) to understand, we are ever more anxious to ensure that the ExA is fully apprised of our operations, what is at stake for us in light of the Proposals as they are presently formulated, and why the impacts on us will be unacceptable.

13. We are also conscious that we need to summarise what we said during ISH1-2 and that we have various "action points" to address from ISH1, in particular, some of them by Deadline 3, and in so far as we can, we address those here (see footnote for actions).[4] Some matters will have to wait for Deadline 4. We aim to clearly flag the responses to the actions as we go.

047, at 4.3.1, and even being generous to the Applicant and allowing it a capacity objective that extends beyond what is said in **APP-047** at 4.3.1 (a NSIP solar project generating up to 500MW), to the '250MW-500MW' set out in its Planning Statement **REP1-016** at 4.1.3, and (b) that the Applicant initially proceeded on the basis of that scheme, not just by communicating it such that it was what was explained to us in 2022, but also including by incurring the expense and time of having ecologists conduct surveys for that site layout.

[3] Other parts of our holding are held freehold or under the Agricultural Holdings Act 1986.

[4] 35. For Deadline 4, 'to evidence and quantify the impact on the NHS and any risk of supply, including identification of any pathways that the Applicant would threaten that supply'. 36. For Deadline 3, 'to provide a marked-up map of [our] proposed alternative construction access route'. 37. For Deadline 3 if possible and if not Deadline 4 'to submit detail around [our] biosecurity measures and further concerns.'
38. For Deadline 3 'to provide the movement plan across the fields referred to'. 43. For Deadline 4 'to provide evidence of how noise and vibration effects impact the quality of donor livestock blood and consequentially, the product of [our] business.' 44. For Deadline 3 if possible and if not Deadline 4, 'to provide (if preferable on a without prejudice basis) a response to the Applicant's proposed mitigations, and identification of any further mitigations [we] consider appropriate'.

14. We also provide this additional submission/evidence with a further purpose, as we have not given up hope the Applicant will: (a) grasp our concerns, and accurately assess the impact on us; (b) recognise that its scheme represents disproportionate, unnecessary and ultimately unacceptable interference with us (and a lack of proper exploration of alternatives) and that the mitigation it has proposed will not work and does not respect the mitigation hierarchy); and (c) make the requisite changes to the scheme (we hope it is not too late, and we have seen the Applicant has recently proposed a change concerning a bridleway – **CR1-001**, but if it is too late, that lies at the Applicant's door,).

15. We have no doubt that if the Applicant had correctly understood our operations, it would not be proceeding as it is: fragmenting our holding with construction and operational land take, risking our biosecurity and our animals' stress levels, and suggesting low tier mitigation that focuses on liaison and monitoring, that will see us suffer harmful impacts first, following which adjustment might (only might, and then only limited) be made.

16. What the Applicant ought to have done, before it finalised these Proposals, and what it must do now, is follow first principles, of compulsory acquisition and mitigation, starting with proper assessment of PFL/TCS as the affected receptor, and seeking to, first, avoid impacts on us altogether, reduce them at source etc. Had it done so Parcel 3 would have stayed small, E23 would form no part of its construction work plans or solar panel area, Granborough Road would not be used for access, the BESS would not be adjacent to our livestock fields, proposals for substantive physical buffering attenuation of noise and visual impacts would have been worked up, and rights across our land would be limited to only what is strictly necessary for cable running. We have been accommodating of the Applicant, and reasonable. We are not resisting the Proposals outright, and we are willing to swallow loss of land in line with the original proposal. The Applicant, by contrast, has not been reasonable with us.

17. We firmly believe that with the benefit of proper information and explanation, the ExA will see that our concerns are well founded.

18. This present document provides a fairly high level explanation. However, we refer to and rely on a number of appendices, where the ExA will find the finer detail, as follows:

a. Appendix A - Site Selection/Layout, Alternatives and Necessity
b. Appendix B – Timeline of Engagement
c. Appendix C - Operating Notes regarding Accompanied Site Visit that took place on 19 May 2026, and Visuals
d. Appendix D – Biosecurity risks and our biosecurity measures
e. Appendix E – Without prejudice interim response to Applicant's mitigation
f. Appendix F – Proposed alternative route to access Parcel C
g. Appendix G – Letters of support

Appendices A and C are particularly important in terms of the ExA understanding our operations and the problems the Proposals present, whilst Appendix B allows the ExA

to see the extent of our attempts to bring the Applicant to understand the gravity of its Proposals for us.

19. We continue to have to strike the very difficult balance between telling the ExA what it needs to know, and avoiding disclosure of certain information. We hope the ExA will understand.

The nature of our operations, including biosecurity measures (including ISH1 action #37: For Deadline 3 if possible and if not Deadline 4 'to submit detail around [our] biosecurity measures and further concerns.') and how our livestock lives (and is managed)

20. In order to understand Preston Farm, it is fundamental to grasp that certain features are key: biosecurity, including of the animals' feedstock; herds/flocks living in a (highly unusual) natural state for most of the year; avoiding stress, not only in the lead up to the donor sessions but generally; getting the livestock and feed from one part of the holding to another with minimal disturbance and interaction with/interference from outside actors; and security generally.

21. Focusing on biosecurity, we are essentially a bubble, and have been for over 60 years. The whole point of our foundation was to secure consistent, high quality, animal donor blood. We have managed that with remarkable success for decades. That is down to our excellent, well trained staff and rigorous procedures.

22. The bubble is breached at peril to our product, our Home Office licence and to our business, and ultimately the diagnostic end users in the medical world. Significant concern was raised by BIVDA at ISH1.

23. We asked the ExA at ISH1 to think of us as a laboratory in farm form. Our Home Office licence reflects that.

24. Biosecurity for the Holding depends on the bubble being pierced as little as possible. Hence the carefully controlled access, our monitoring of the (few) PROWs that pass through, and our self-sufficiency as regards feed.

25. Biosecurity for personnel starts with our recruitment process. It then proceeds through training of our staff, to on-site physical measures, and refresher training.

26. Biosecurity for machinery includes that our vehicles must stay within particular areas, remaining in permanent quarantine within them.

27. Another measure relevant to the machinery is the care we take not to disturb the soil or the air, given this can release moulds and other contaminants.

28. See Appendix D for biosecurity risks and the measures we take.

29. In terms of the care with which we manage our donor livestock, to keep stress levels low, the ExA will have seen on the ASI the natural state of our animals. The ExA will also have seen how we keep our horses out of narrow areas, such as the fenced paddock around the national grid pylons that the ExA viewed from Sion Farm.

30. To ensure we manage the animals' feed, they need to be moved regularly. Evidence of herd / flock rotation for grazing purposes was provided during the recent ASI.

31. The extent to which the Applicant has got us wrong is further evidenced by its repeated leaning on British Horse Society guidance, with only half-acknowledgment it is inappropriate.[5] Our horses are not ridden horses being moved under individual human control: as the ExA has seen, they are semi-wild donor animals managed in large herds of approximately 60–70 horses, living and moving close to their natural species state: loose, as herds, not as isolated or individually handled animals. They are easily spooked with no rider/groom to calm them.

32. That is the system the experienced veterinary evidence we have supplied explains, and it is not to be assessed by reference to generic equestrian guidance from the BHS. The Applicant's "technical study" and proposed mitigation measures start from the premise of off-the-shelf guidance from e.g. the BHS concerning construction sites and ridden/driven/led horses. If the Applicant had understood us, it would have recognised that guidance appropriate for normal equestrian use has no application to us.

33. Ultimately the Applicant's lack of understanding is evidenced by its conclusion the impact on us will be "not significant" or slight". Which is simply wrong.

34. The Applicant may have expertise in energy development and related planning issues. It does not possess our expertise, only we do, spanning Home Office licensed donor animal systems, equine and ovine welfare or our particular livestock, farming rotations on our particular self-sufficient Holding, biosecurity, blood product consistency and quality or clinical diagnostic supply chains etcetera. The Applicant is not even using equine and ovine specific assessments to understand our concerns and the likely effects on us.

35. We have presented specialist technical evidence on this, including the best possible veterinary evidence in terms of our particular animals, and our own expertise of the product. The Applicant has not. Instead it seeks to prevail on the ExA (and us) to accept the effects will be managed through a commitment to liaise with us and through generic non-substantive liaison/management type mitigation.

36. The combination of these matters, our Home Office licence, animal welfare, stress minimisation, biosecurity, general security and food security/self-sufficiency, and the conditions on which the operation depends, means we are not a malleable business, that can be buffeted and reshaped to accommodate the Applicant's preferred layout.

37. Whilst we are always cautious regarding a site visit by unauthorised personnel, given the biosecurity and security concerns, and licensing conditions, we decided that for the ExA to truly understand the conditions that we operate under, it was necessary for the ExA to see areas otherwise restricted, and we hope that has assisted the ExA.

38. We are conscious of the limited time allowed during the ASI and if the ExA would find it useful, we would be happy to accommodate the ExA on a separate further site specific inspection to go into greater depth.

39. We do not want to be in this position. We have provided what we consider an appropriate level of detail at each stage of the process (this is also highlighted in Appendix B), but are willing to provide further explanation where that would assist the

[5] In addition to WR response Appendix 1, see also response to Q.1.17.4, sub-query 2, Q.1.16.5, sub query 2, etc.

ExA, including by way of a closed session if the ExA considers that useful for commercially sensitive or supply chain sensitive matters. We recognise that the Applicant has a project to deliver. But we have operated from this site for over 60 years, supplying critical raw material for clinical diagnostics. We cannot accept avoidable interference with the operation where design changes have been repeatedly identified and remain available.

40. Although the Applicant's own wording nods in our direction (e.g. it says it "has and continues to acknowledge the sensitive nature of Preston Farms operation", and that it has taken note of feedback from us and made amendments to "avoid, reduce and/or minimise" effects), it clearly refuses to truly accept how sensitive our operations are, and has made clear it is unwilling to bend, rather than change the Proposals to reduce harm in accordance with the mitigation hierarchy. Instead, it continues to treat us as if our business can and should be rearranged around the Proposals, rather than understanding us and the Proposals accommodating us.

41. We also consider that "agent of change" NPPF principles are on point. We are an established, specialist and regulated operation. We have been here for over 60 years and it is the Applicant introducing these new risks, not us. The burden should be on the Applicant to design the scheme so that it does not compromise the existing operation, not on us to attempt to survive around its preferred layout.

42. It is impossible for us to see how mitigation alone could avoid an unacceptable impact on us. However, as requested by the Applicant and as actioned by the ExA, we offer a without prejudice, interim, response to the Applicant's proposed mitigation in Appendix E. We do so now, at Deadline 3, to assist. However, we will revisit this for Deadline 4.

The Proposals in terms of site layout and the mystery of how the Applicant has arrived at a layout so much worse for us than the original

43. When the Proposals were first presented to Mr James Preston, in 2022, by our landlord's land agent who was also acting as agent/messenger for the project team, 'Parcel 3' as a whole was much smaller: essentially only the substation, and staying away from the heart of our Holding. It caused us problems as we explained at the time, as it took two of our fields. But it was nothing like the present Proposals. It is inexplicable that despite our explanations at the time and over the years, the Proposals have become much worse for us (and it is also troubling the ES does not even record the shift, despite the evidence of the original layout that has bubbled up through the Bat and Wintering Birds surveys).[6]

[6] See **APP-088** (2022 bat survey) and **APP-089** (2022 wintering birds survey) and in particular their figures which show the originally proposed site red line and demonstrate the limited extent of 'parcel 3' as first explained to us. Then see **APP-047** (reasonable alternatives considered), in particular section 4.7, for the complete lack of acknowledgement of this within the purported explanation of the design evolution.

44. We are particularly non-plussed that: (a) not only has what was originally presented to us not been pursued, but something much worse; and (b) alternative layouts which would allow coexistence without us being so severely affected were not considered.

45. If the Applicant had been truly hearing us, it would surely not have reached down into our Holding as it now has. See Appendix A for how the Proposals have expanded onto us.

46. The Applicant tries to justify the current layout of the Proposals by reference to efficient use of land, maximum solar benefit and "maximum CNP infrastructure benefit". That is not the same as demonstrating that the proposed construction and operational land take, interference with land rights, and layout, are necessary or proportionate, amount to a "compelling case" in the public interest for compulsory acquisition, represent the minimum necessary interference with PFL/TCS in accordance with the mitigation hierarchy, or avoid the 4.2.15 exception.

47. If the general area is attractive for a solar scheme (we do not know, it seems from **APP-047** that the Applicant's major concern was to find a single freeholder), and even if the present layout of the Proposals is attractive for a solar scheme, that is not justification for: the use of field E23 for construction and then for solar arrays; the use of Granborough Road for access; the placing of the BESS by our livestock fields; and the wide ranging access rights sought, nor for lack of worked up physical buffering attenuation our livestock against the various elements).

48. It is not possible for the Applicant to comply with either compulsory acquisition guidance or the mitigation hierarchy based on the current layout/arrangements. The Applicant does not say that e.g. use of field E23 for solar arrays is unavoidable, or positioning the BESS by our livestock is necessary etc. It is that this is said to maximise solar output and land-use efficiency. That is an optimisation argument, not a necessity case.

49. See Appendix A and Appendix C for expansion of these points, and see the timeline in Appendix B which shows we have explained our issues and concerns for at least three years, including well before the site design was finalised. We cannot understand why our concerns were not taken seriously. The Applicant's general approach (aside from asking for basic operational information it should have acquired years ago), is to merely pay us lip service, to push mitigation into the future, and require PFL/TCS to hope for the best that things won't go wrong, whilst requiring us to attempt to alter the way our operations work and get by. But we cannot move animals differently, reduce current welfare standards, accept replacement land (including the recently mentioned suggestion of temporary additional land during construction), use movement corridors rather than open fields, adapt and risk biosecurity arrangements, dynamically respond to construction activity and evolving future plans, without putting our operations at unacceptable risk. This is the Applicant transferring an unreasonable and unworkable burden and an unjustifiable level of compromise and risk onto us, rather than doing its job in accordance with the mitigation hierarchy and compulsory acquisition principles.

50. It is particularly unreasonable the Applicant is doing this, when relatively small changes to the Proposals would mean we could live with them. It is not as if we are seeking to avoid any land take from our holding, or any construction impact.

51. Consultation should inform design while changes can still be made. It should not simply record objections and then offer mitigation on the basis the layout is fixed regardless of consultee's responses. We refer to and rely on Appendix B.

52. Equally, CNP status does not remove the need to assess sensitive receptors properly, apply the mitigation hierarchy, or justify interference with land and private rights as necessary, proportionate and no more than reasonably required. Particularly given the application of EN-1(2023) 4.2.15.

53. The Applicant's retention of E23 for construction and panels and the suggestion of a 20m livestock corridor or corridors through it is a case in point. If the Applicant had taken us seriously it would have appreciated that E23 is at the heart of our Holding and essential for movement, and that our herds of horse, in particular, require considerable widths to move. Exceptions to this are limited and appropriate, e.g. field gates or donation.

54. Similarly, the Applicant's proposed use of Granborough Road for access.

55. The ExA may be interested to know that the Applicant had never asked for a site visit to Preston Farms to see our operations.

The particular problems posed by the use of field E23 and the Granborough Road (including: 36. For Deadline 3, 'to provide a marked-up map of [our] proposed alternative construction access route', and 38. For Deadline 3 'to provide the movement plan across the fields referred to'.)

56. E23 and the use of Granborough Road for access are paradigms of the Applicant's flawed approach: the question for the Applicant should be whether retaining E23 for construction and/or a solar array, and accessing by the Granborough Road, is necessary, proportionate and the least interfering option for a known sensitive holding (and we note EN-1 at 4.2.3 anticipates such accommodation). As Appendix B shows, we have made clear from early on that these are significant problems for us, and that has not changed.

57. As regards E23, the Applicant asserts it has mitigated the inclusion of E23 by removing the Rosefield Substation and BESS from E23 and proposing only solar PV. But even aside from the fact the Proposals expanded onto E23, this is not a proper application of the relevant principles, which required the Applicant to ask itself whether E23 is truly necessary (also: (a) it is not accepted that we are the reason why the substation location shifted in any event; (b) if the Applicant had taken our BESS concerns seriously, it would not have moved the BESS adjacent to another part of our holding; and (c) we note from the Applicant's response to Q1.1.3 that it is by no means certain the BESS will proceed in any event, and it is clear from that response that the BESS is not an indispensable item for the project, as befits it 'associated' status, and that its fundamental purpose is arbitrage).

58. As the Applicant continues to misunderstand and understate the centrality of E23 to the operation of our holding, we have provided further material in Appendix C, over and above our WRs and responses to ExQ1. This includes further practical context on the scale of space required for safe horse movement through an extended corridor. It draws on what we have said and actually done separately in relation to a recently

fenced area around National Grid grid infrastructure: the area is only some 65m, which is too narrow for the herd, so we have kept them out of the pasture there. That has nothing to do with these Proposals, and it illustrates our consistent approach to the width we know is necessary for horse grazing or movement in light of potential welfare risk. Our approach to the proposed corridor connecting the proposed replacement land (~90m wide, the absolute bare minimum) is also consistent.

59. For the avoidance of doubt, the use of E23 as a construction compound would be unacceptable, as would its use for solar arrays. A construction compound inevitably involves personnel, vehicles, plant, storage, deliveries, welfare facilities, lighting, noise, dust, disturbance and regular activity. Churning up of ground (potentially releasing pathogens), disturbance of air (likewise), introduction of new actors and machinery (likewise), all exposes our livestock to biosecurity and contamination issues and increases risk across the range of our key concerns (see Appendix D, also Appendix C).

60. As regards the Granborough Road as a means to access the Proposals, during construction and beyond, this is equally unacceptable. It drives biosecurity and stress risk straight into our Holding.

61. Granborough Road is narrow single track. We use it to transport time-critical donor product to TCS, to load and unload the silage clamps, and for many other essential movements, such that there is continuous movement onto/over Granborough Road to and from our holding, just where the access is proposed adjacent to the silage clamps.

62. The tracked CTMP confirms rather than resolves our concerns, retaining access to Parcel 3 from a new junction on Granborough Road, to be used by all construction traffic other than AIL traffic, and confirming physical works are proposed for Granborough Road, including passing places and widening works.

63. The Applicant relies on traffic mitigations, but those will worsen the situation for our own specialist farm traffic (the Applicant is assuming that only it has specialist/larger/HGV traffic and the other users do not).

64. In response to the Applicant's question 4.1.2, the relevant parcel is continually used for animal grazing, subject to normal rotational grazing patterns, and for regular animal movements. It forms part of the main access into Middle Farm and is used for animal movements approximately four to five times per week. To reiterate, our animals do not move according to Rosefield's construction programme. Again, we illustrate movement patterns in Appendix C.

65. It is particularly frustrating the Applicant is continuing with this proposal, given there is a perfectly acceptable route via the Winslow Road available to it, which was, notably, preferred by the Statera Inspector over the Granborough (also known as Hogshaw) Road. We present our alternative proposal at Appendix F.

66. As regards the Applicant's WR response Appendix 1 at 4.3.3, the need for additional road works or land rights is not a reason to reject Winslow Road: as noted, the Applicant is proposing substantial road works to Granborough Road (and it is seeking compulsory acquisition powers over land affecting us, and others: they are clearly not a general bar).

67. Equally, as with other items, the Applicant cannot pray in aid the advanced stage of the application or inconvenience to it as a reason not to pursue a less harmful arrangement: the Applicant's refusal to face up to the issue cannot be made our problem. As Appendix B shows, we have raised concerns about access to Parcel 3 for many years. We have not, and do not, accept that access via the Granborough Road is necessary or proportionate.

68. In addition, the Applicant's refusal to include us in the Traffic Management Group is inexplicable. We are a year-round, Home Office licensed operation whose continued functioning depends on controlled and uninterrupted movement of animals, staff, feed, machinery and donor blood products, and we are the main user of Granborough Road for this purpose. We do not wish for unnecessary administrative involvement in the Applicant's project, but if the Applicant relies on traffic management as mitigation, then we must have a secure and defined role in the management mechanism. See our Appendix E regarding mitigation for further detail.

Matters (such as biosecurity, stress avoidance etc) cannot be left for future management/liaison/consultation etc, but must be designed in

69. The Applicant's biosecurity response is another useful case study. It says biosecurity measures will be developed in consultation with Preston Farms based on best practice. It refers to advance notification, appropriate measures, toolbox talks, liaison, temporary additional land and rotation grazing plans. It "believes any risk can be managed".

70. That phrase captures the Applicant's approach. It does not demonstrate that risk has been avoided at source. It assumes that risk can be introduced into our holding and then managed afterwards. That is the wrong approach to biosecurity. Formal (Government) guidance starts from the premise that unnecessary access, movement and contact should be minimised in the first place. Defra/APHA identify one of the "2 most important considerations for biosecurity" as designing working practices to "minimise" how often people, equipment and vehicles are entering places where farm animals are kept. HSE guidance similarly refers to protocols designed to "minimise movements, contact and therefore potential contamination of all people, vehicles and equipment used." Biosecurity best practice is to minimise entry, movement and contact. Those guidelines are written for ordinary agricultural holdings and apply with greater force to a Home Office licensed donor animal operation supplying a healthcare diagnostic chain.

71. Biosecurity at PFL/TCS is not simply a protocol to be applied after access, construction activity and third-party movements have been designed into the holding. It is the operating condition of the holding itself. It depends on controlled access, controlled animal movement, separation from external activity, low disturbance conditions, feed traceability and careful management of cumulative risks.

72. The same points apply to the Applicant's approach to the need to avoid stressing the animals, through noise, movement etc, to avoiding feed contamination etc.

73. Of relevance to the Proposals, this means not fragmenting the holding by using E23 for panels (or as a construction compound) and it means minimising the risk of impacts,

by not using Granborough Road for access, and not siting plant (such as the BESS) proximate to the livestock, and not using our holding for wide ranging access, exposing us to many additional people, vehicles etc and associated disturbance and contamination risk.

74. To take noise disturbance as a further example, the "technical note" at Annex A to Appendix 1 of the WR response demonstrates the inadequacy of the Applicant's approach, underlining the cause for concern, rather than reassuring. The Applicant has still not used technical data on noise impacts for horses, and it confirms that horses, sheep and cattle were not specifically assessed as receptors in the noise assessment. It acknowledges that sudden noise can disturb horses, that noise and vibration can have an impact on horses and sheep, and that construction and decommissioning present greater potential for noise and vibration impacts than operation, but rather than ask how the scheme can be adjusted accordingly, it moves directly to mitigation around the edges based on management. As to which, the Applicant appears to assume that we can monitor construction noise and vibration on a live, full-capacity donor-animal operation, identify when disturbance has become unacceptable, raise complaints, wait for investigation, and then rely on remedial action. That is not workable.

75. By the time a complaint has been made, investigated and acted upon, the disturbance and its effects will already have occurred. That is particularly serious because the Applicant has not explained what would happen if disturbance has affected the quality, consistency or usability of the donor blood product. Nor has it identified any policy, protocol or means of rectification if that product is compromised. We understand the Applicant has previously accepted that such effects cannot be guaranteed to be avoided. That is precisely why prevention, not after-the-event complaint handling, is required.

76. This is one of many examples of the Applicant's approach moving beyond mitigation and into directing how we must run our business. Suggestions such as temporary additional land, altered rotation grazing plans, moving animals away from construction activity, are proposals for PFL/TCS to alter the way we run so that the Applicant can retain its preferred layout. Nothing in the national policy support for CNP infrastructure requires that approach. We are not an unpaid project-management/risk-management resource for the Applicant. Our businesses are at full-capacity with their own regulatory, animal welfare, production and supply chain obligations. Continuous post-consent engagement over construction sequencing, access, biosecurity, traffic, noise, emergency procedures and animal movements would impose a substantial burden and risk. That is not mitigation. It is a consequence of the Applicant's failure to resolve the key issues now.

77. Future liaison is not a substitute for designed-in mitigation and clear, enforceable limits in the DCO. Hopeful trust is not a mitigation measure. Nor is "continued engagement" an enforceable control unless the outcome of that engagement is secured. The DCO must control the risk. It cannot simply assume PFL/TCS will manage the risk for the Applicant.

The "replacement" land

78. It is disappointing to see the Applicant rely upon its summary of Compulsory Acquisition Hearing 1, at which it sought to present what has been proposed as 'replacement' land as something we consider an adequate offset. Whilst we are of course grateful for the "replacement" land (albeit it is not yet secured), the loss of the field at the heart of our holding (E23) is not offset by land out on a limb (and that will only just deliver adequate access, and will need considerable time and effort to bring it to a useable state).

79. In addition, as set out in our Deadline 2 response to ExQ1, whilst Heads of Terms were agreed, there is currently no agreed contract in place for the proposed replacement land and we await a draft agreement. We have included additional details about the "replacement" land at Appendix C.

Overview of Applicant's response to WRs and ExQ1 and Applicant's various (belated) requests for further information

80. As relevant to PFL/TCS, the Applicant's response to the WRs involves both a thematic approach and a specific appendix. The references to our WRs in the thematic sections are: 1.2.2–1.2.7; 4.2.3; 5.3.1; 8.2.14–8.2.25; 8.2.27; 9.1.1 and 9.1.3–9.1.5; 9.1.9–9.1.12; 9.1.45; 9.2.5–9.2.7; 9.3.6; 9.3.9–9.3.10; 9.3.15; 9.3.33; 11.2.7–11.2.8; 13.2.2 and 13.2.8–13.2.15. The appendix specific to PFL/TCS is Appendix 1. A search for "Preston Farms" or "TCS" across the document returns many hits. The Applicant's response to ExQ1 is in the same vein.

81. Superficially, this might give the impression the Applicant is engaging substantively with our concerns. But it is the detail that matters, and it is apparent that what the Applicant is actually seeking to do is to justify its unwillingness to alter the Proposals to reduce the harm to our operations, and instead assert the benefits of its inadequate mitigation. In the process, though, it reveals its continuing lack of understanding.

82. In its WR response, Appendix 1, the Applicant asks repeatedly for operational information, that it should have ensured it had long ago (and insofar as it did not ask the questions long ago, that is of itself telling) (e.g. 2.1.4, 2.1.5, 3.3.1 etc), and it consistently demonstrates it has not understood. We have already highlighted a number above (such as why the proposed use of E23 and the Granborough Road access are so obviously inappropriate, the failure to understand our specific livestock, the casual reliance on liaison and management as regards biosecurity and avoidance of stress). Another is the Applicant's belief we draw a binary distinction between 'pasture' and 'arable' fields, theorising it can construct etc next to 'arable' without disturbing our livestock (and that we should make fields 'arable' accordingly). But in order to ensure our animals are fed only from farm the so-called 'arable' is also used for grazing after cropping;

83. Reading the Applicant's response to WRs and answers to ExQ1 brought home to us the extent to which the Applicant had not listened to our concerns and had failed to understand why we are so concerned, despite our attempts to engage it over the years. ISH1 confirmed matters.

84. As regards the Applicant's requests (that it should have made long ago).

85. The Applicant suggests (WR response, Appendix 1, 6.1.2) that details of how E23 is used for movement and rotation have not been provided, and seeks that information. We are surprised this request comes only now, but have provided a map and text in Appendix C.

86. The same point applies to the Applicant's requests for information about when animals are inside or outside. We have engaged with the Applicant over many years and have repeatedly explained that the holding operates as a controlled, seasonal, weather-dependent livestock system. That the Applicant either has not understood, or is only asking now, reinforces our concern that the scheme has not been designed around the actual operation of the holding, and that we are simply an afterthought.

87. As a broad indication, the animals are normally brought inside from around mid-October to mid-April. However, this varies depending on weather, ground conditions, animal welfare, grazing conditions and operational need. It cannot be assumed that fields or routes will or will not be in use on fixed dates (and a mitigation strategy cannot be based on such assumptions, if that is what the Applicant has in mind).

88. PFL/TCS's animals do not move according to Rosefield's construction programme. They move according to their welfare, weather, ground conditions, field rotation, biosecurity and the needs of the production system. This was highlighted to the Applicant and should have been understood before the layout was finalised.

CNP and the unacceptable risk/interference with health/safety exception

89. After we raised it in our WRs, the ExA at ExQ1 asked (Q1.17.1) whether the potential impact on PFL/TCS could fall within the EN-1 4.2.15 exception to the presumption in favour of CNP, by reason of unacceptable risk to, or unacceptable interference with, human health and public safety.

90. The Applicant has asserted in response that no evidence of unacceptable risk/interference has been provided and relies on its assessment of the effect on our businesses as "not significant". That simply invites the question as to whether the Applicant's assessment stands up, but in any event we have provided more than sufficient concrete evidence to make our case.

91. In terms of the importance of the product for the NHS and others, the ExA has now heard oral evidence from BIVDA's CEO, Helen Dent. We also attach letters supporting this position from the Sepsis Trust and AMR Action UK (the UK's leading patient charity for Antimicrobial Resistance) in Appendix G.

92. In terms of how much of that product is ultimately dependent on what we supply, we do here start to run into confidential areas. However, to assist, we have sought confirmation from the only other known UK supplier as to whether it could provide contingency supply if PFL/TCS were significantly affected. The answer is: no.

93. We will consider for Deadline 4 whether we can share more precise information. However, we are confident regarding the extent to which public health, home and abroad, is dependent on our product.

94. The risk from the Proposals is not merely private or commercial; it concerns national level resilience in a specialist clinical diagnostic supply chain. For practical purposes, we consider our operations are themselves CNP.

95. We are at a loss as to what more the Applicant wants to see before it concedes an unacceptable risk/interference exists so as to engage the exception to its own CNP status: we have provided the Applicant with our own specialist input and with veterinary specialist input, and the Applicant says it acknowledges the unique nature of our operation and of our product, it claims to recognise our paramount need for biosecurity and stress avoidance, in circumstances where it says it accepts that our animals are highly sensitive, it knows they live in a unique way, it knows it is taking land in the centre of our Holding for a construction compound and then panels and proposing an obviously unsuitable movement corridor or corridors to boot, and to use the ordinarily quiet singletrack road we rely on as its access to Parcel 3, again driving into our heart, whilst putting the BESS by us, seeking access rights over us etc. We feel it is sticking its head in the sand.

96. Again, though, if we can provide further information for Deadline 4 in relation to the relevant actions, we will (these are: 35. For Deadline 4, 'to evidence and quantify the impact on the NHS and any risk of supply, including identification of any pathways that the Applicant would threaten that supply'. and 43. For Deadline 4 'to provide evidence of how noise and vibration effects impact the quality of donor livestock blood and consequentially, the product of [our] business.').

Conclusion

97. Despite the many pages the Applicant spent on its responses to WRs, including the specific Appendix 1 responding to us, and its responses to Ex Q1 relevant to us, we were left more rather than less concerned, and ISH1-2 have not changed that. We feel the Applicant has failed to face up to the particular nature of our operations and the threat the Proposals pose to us. On an overarching basis, we are dumbfounded that the Applicant continues to assert that the effect of the Proposals on us would be "not significant". We have raised our concerns over many years, we have engaged constructively and have not sought to stop the Rosefield project. However, the Applicant has refused to take substantive steps, has failed to design out the problems at source, and has in fact increased the impact on us by enlarging Parcel 3 over time.

98. We should not be required to change the way that we farm and manage our animals, or to undertake constant management, monitoring and negotiation around unresolved design choices for the next several years, because the Applicant has failed to do what it ought to have done, in accordance with well established policy around compulsory acquisition and the mitigation hierarchy, and strive to avoid impact in the first place (and this is even before getting to the application of the EN-1 4.2.15 exception to the presumption in favour of CNP, or the reality that our operations are themselves critical national priority on any sensible view).

99. We would be grateful if the ExA would read this document, and in particular the detail in the Appendices (which we do believe the ExA will find helpful).

100. We would also be grateful if the ExA would let us know if it continues to have questions for us: we will endeavour to answer them, within the limits of what we can

sensibly say without exposing ourselves to intolerable risk, or rendering us commercially vulnerable.

Rosefield Solar Farm DCO Examination
Preston Farms Ltd and TCS Biosciences Ltd ("PFL/TCS")
Appendix A — Site Selection, Alternatives and Necessity/Whether interference and risk to us can be justified and is acceptable

A1. Purpose of this Appendix

A1.1 This Appendix supplements PFL/TCS's additional submissions and evidence to inform and assist the ExA following the ASI and ISH1 and should be read with it and with the Timeline of Engagement at Appendix B ("**Appendix B**"). It addresses the Applicant's reliance on site selection, policy support, efficient use of land and "maximum CNP infrastructure benefit" as justification for retaining the layout, fields, access route and rights sought against PFL/TCS.

A1.2 We have already set out in our Written Representation [REP1-133] issues with site selection and minimising impacts on interested parties. However, given that in its latest documentation the Applicant relies heavily on the fact that it is not obliged to find the "best" possible site, we want here to focus on whether the Applicant has discharged the test for compulsory acquisition under section 122 of the Planning Act 2008 and the Government's Guidance on the Compulsory Acquisition Process (September 2013, as updated), and also whether it has shown (as it claims) that its Proposals are not causing an unacceptable risk to or interference with health and safety, when considering the exception to the presumption in favour of CNP provided for by paragraph 4.2.15 of EN-1 (2023).

A1.3 The Compulsory Acquisition Guidance is clear. The first paragraph under "General considerations" requires the Applicant to satisfy the Secretary of State that:

> *"all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate."*

A1.4 We suggest that if the Applicant cannot demonstrate compliance with these principles, it cannot possibly hope to avoid the application of the exception to the CNP presumption at EN-1 (2023) paragraph 4.2.15.

We do not say the Applicant was required to find the "best" possible site. The question is whether this particular layout, fields, this access route and other rights have been justified, as against PFL/TCS, given the impacts on us, as necessary, proportionate and the minimum interference with the operational holding (the "Holding"). On the evidence before the Examination, we do not believe that the Applicant has discharged the burden on it and consider it cannot satisfy the test.

A2. Applicant criteria

A2.1 The site-selection process the Applicant describes is grid-led and landowner-led. It is not interference-led.

A2.2 The Applicant's Site Selection Report (Appendix 1 to the Planning Statement [REP1-016]) describes a process driven by:

- the availability of a viable grid connection at East Claydon, and a 10 km area of search defined by reference to that connection (Site Selection Report, at 4.2.3);
- a stated preference for a site closer to the National Grid East Claydon Substation, on the basis that "*a shorter cable route has benefits in terms of ease and timeliness of the delivery of key infrastructure, minimising disruption to residents and businesses along the route, minimising environmental disturbance and cost*" (Site Selection Report, at 4.2.3);
- a stated preference for "*single, contiguous sites with as few landowners as possible*", on the basis that this would simplify negotiations, reduce project failure risk and "*reduc[e] reliance on compulsory acquisition*" (Site Selection Report, at 4.3.4); and
- the identification of "*a single landowner, located directly adjacent to the National Grid East Claydon Substation land, who was agreeable in principle to leasing sufficient land for a solar development that optimised the grid connection*", after which (in the Applicant's own words) "*the Applicant didn't look further for alternative sites*" (Site Selection Report, at 4.3.7).

A2.3 PFL/TCS accept that a viable grid connection is essential. However the remaining factors are, on the Applicant's own description, largely commercial preferences of the Applicant — shorter cable runs, simpler negotiations, reduced project failure risk. They also totally disregard that, although the land was offered by a single landowner, the vast majority of the site made available is tenanted and so the effects of the project would be felt by three tenants with property interests. The layout of the scheme would have minimal effect on the actual landowner who has offered the land. It is the three tenants who would be materially disrupted. Tenants have rights too (and as the actual occupiers, are inevitably affected in the most immediate sense).

A2.4 Two further items in the Applicant's own material reinforce the point. First, on consolidation with other projects (response to ExQ1.4.10), the Applicant confirms only that it has been in discussions with the developers of East Claydon BESS. There is no evidence of any wider testing of alternative configurations within the available landholding to reduce impacts on existing occupiers. Second, on the use of non-BMV land in the south-western extent of the area of search (response to ExQ1.4.9), the Applicant says simply that "*there was considered to be no need to extend into the grade 4 land to the south-west*" which shows the site was already decided.

A2.5 The Site Selection report's own conclusion, at 6.1.4, is consistent with this analysis: "*The Applicant took into account all of the above considerations and used this to identify land that met the criteria within the Search Area. The Applicant then sought to approach owners of this land to understand their willingness to be involved in the Proposed Development.*" The process did not consider compulsory acquisitions sought against people other than the single landowner and the gap in the selection is the lack of review of any impact on those interested parties.

A2.6 As previously stated in our written representation the Applicant has not considered the minimum impact that its design would have on PFL/TCS. It has just considered the site as attractive for its purposes.

A3. Minimum interference with PFL/TCS

A3.1 Site selection and layout are different matters, and layout justification within the site and should be considered separately. The Applicant relies only on NPS EN-1 paragraph 4.3.9.

A3.2 Paragraph 4.3.9 of NPS EN-1 (response to ExQ1.4.8), states that "*this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective*". PFL/TCS accept that this is the policy position on *site selection*. It is not a substitute for the well established test on *compulsory acquisition*, nor when considering EN-1 paragraph 4.2.15 (or, indeed, application of the mitigation hierarchy).

A3.3 The Site Selection Report itself acknowledges this. At 3.1.10 the Report identifies that "*Where a proposal would involve the compulsory acquisition of land or interests in land (NPS EN-1 paragraph 4.3.9). Please see the Statement of Reasons [EN010158/APP/4.1] for more detail on this.*" The Applicant therefore accepts in its own site-selection material that the compulsory acquisition test is a separate test, properly the subject of the Statement of Reasons. What the Applicant has not done, in either document, is engage with how that separate test is satisfied as against PFL/TCS specifically.

A3.4 The Applicant may show that it has chosen a site that meets the criteria however, in relation to where the compulsory powers lie, can it show that, within that site, it has designed the layout and the rights to minimise interference with affected interests.

A3.5 The Applicant's reliance on the precedents of West Burton, Heckington Fen, Mallard Pass and Gate Burton (Site Selection Report at 2.2.2–2.2.5) does not bridge the gap. Each of those decisions concerned the suitability of a grid-led starting point for site selection. None of the cited precedents concerned the layout of a chosen site against a Home Office licensed donor-animal operation.

A3.6 Our case is not that the Rosefield project should "go somewhere else". We have very consciously sought to accommodate wherever possible, and only stand our ground where we absolutely have to. Our case is site-specific and proportionality-based. As the timeline in Appendix B shows, the operational sensitivities of the Holding were notified to the Applicant before the first public consultation, and we have continued to attempt to drive them home ever since.

A3.7 The Applicant has shown why this area was *attractive*. It has not shown why this layout is *necessary*, let alone that its Proposals would not cause unacceptable risk to or interference with our operations, which are obviously of huge importance for public health and safety (and see the evidence of Ms Helen Dent of BIVDA, given to the examination at ISH1).

A4. Landowners and affected interests are not the same thing

A4.1 Minimising the number of affected freehold landowners is not the same as minimising affected interests.

A4.2 As above, the Applicant places weight on having dealt with a single landowner. The Site Selection Report at 4.3.4 records that the Applicant prioritised "*single, contiguous sites with as few landowners as possible*". It states that this will simplify land negotiations, reduce project failure risk and reduce reliance on compulsory acquisition. However, policy is concerned to protect *affected interests*, not merely freeholders, and it seeks to avoid unacceptable risk to/interference with health and safety, and policy is certainly not designed with the aim of protecting the Applicant from the inconvenience of having to negotiate with and accommodate multiple interests. The Applicant has invoked a policy designed to protect affected interests as a justification for it refusing to adjust the Proposals' layout, which is a curious position.

A4.3 The operational impact of the scheme falls on PFL/TCS as occupiers, not on the freeholder. A site-selection process focused on one landowner, while leaving the operational consequences to fall on a third-party occupier, is not a process likely to deliver minimum interference, and so it has proved.

A4.4 On the present record, the Applicant has not explained:

- what land within the wider Claydon Estate landholding was, and was not, made available for design purposes, or was the subject of a request by the Applicant;
- whether alternative configurations within the available landholding were tested against the operational consequences for existing occupiers, in particular for PFL/TCS as a known specialist receptor.

A5. The Applicant's failure to inform itself at the design-formative stage

A5.1 The key principles of compulsory acquisition, and EN-1 (2023) 4.2.15, and the mitigation hierarchy, have to be kept in mind when proposals are at the formative stage. Where a developer is on notice of a sensitive specialist receptor, the avoidance step requires the developer to inform itself about that receptor sufficiently to ensure that the embedded design responds to it. That is the moment at which design is malleable and at which interference can in fact be minimised at source. We set out at Appendix B the time line to show that the Applicant had repeatedly been made aware of the issues from an early stage.

A5.2 The Applicant, for whatever reason, did not assess PFL/TCS properly as a starting point, and work up a design with us embedded into the design evolution process as a unique receptor. The consequences of that failure are now baked into the proposed layout**.** Instead, from a starting position where the land take from our Holding was presented to us as two fields tight to the existing East Claydon sub-station, so a much smaller 'Parcel 3', the Proposals have reached down into the heart of our Holding, including taking Field E23 and accessing off the Granborough Road into us (we discuss this further below). This flies in the face of all the applicable principles, and this 'evolution' has not even been explained.

A5.3 What the Applicant did not do, at any point during the design-formative stage, was ask to be shown how the Holding actually operates. There was no request for a site visit to observe the donor-animal operation in practice; no request to be shown how E23 functions as a movement and rotation linchpin; no request to be shown the indoor/outdoor seasonal cycle, the controlled-movement protocols or the biosecurity measures; and no request to understand how the holding operates as an integrated controlled biomedical production system, rather than as a conventional farm.

A5.4 The Applicant is now asking for all these details but it is too late in the process. The avoidance step in the mitigation hierarchy was therefore never properly engaged.

A6. Design evolution and the Applicant's inexplicable (and unexplained) departure from the original proposal, with a much smaller 'Parcel 3'

A6.1 Where the Applicant has changed the layout, the changes have been driven by its own commercial considerations and by other parties' concerns. From proposals that were originally for a much smaller 'Parcel 3', the Proposals now reach down to take the heart of our Holding, and similarly access into and through the heart of our Holding from Granborough Road. We are at a loss as to how this can be squared with a correct approach to us. Then with the present Proposals, the Applicant has refused to make the targeted changes PFL/TCS seek, while continuing to change the layout for other reasons.

A6.2 The Applicant suggests that it changed the layout of E23 to assist PFL/TCS, however not only has the Applicant not done what we have asked (instead it continues to propose solar arrays on E23) we suspect that what it has arrived at was likely to be its preferential layout in any event: on the relocation of the Rosefield Substation away from E23, ES Volume 1, Chapter 4 [APP-047] says, in terms, at 4.7.43:

> *"The removal of Field E23 as a potential siting zone for the Rosefield Substation would reduce the maximum possible length of the Grid Connection Cable Corridor between the Rosefield Substation and National Grid East Claydon Substation. Shorter distances have commercial and energy efficiency advantages and would also minimise environmental effects and temporary disruption associated with construction."*

A6.3 The Applicant's own Reasonable Alternatives Considered chapter therefore states that the substation move was driven by commercial and energy efficiency advantages to the Applicant. That is the kind of optimisation a developer would make in any event. To the extent the Applicant has elsewhere presented the substation move as PFL/TCS-led mitigation we do not agree that this is the case.

A6.4 A similar pattern is observable on the BESS. Chapter 4 at 4.7.39 confirms that Field E23 "*has since been removed as an option for the location of the BESS*" in response to consultation feedback, with the BESS now solely in Fields D8 and D9. PFL/TCS do not contend that this change was bad however it has been moved to be adjacent to a different part of the Holding near to Parcel 2, with the consequences for that part of the operation now addressed in the expert review of Dr Wojciech Mrozik annexed to PFL/TCS' Deadline 2

answers. **A6.5** Furthermore, the September 2024 consultation material and map, shown in Appendix B, showed Field E23 and Fields D8 and D9 as alternative BESS siting options. The project was not going to require more than one BESS location; the issue was which option would be chosen. The subsequent selection of D8/D9 therefore does not, without more detail, demonstrate a PFL/TCS specific avoidance exercise. If the Applicant says otherwise, it should explain why Field E23 remained a BESS option in September 2024 despite PFL/TCS's earlier engagement.

A6.6 In fact, and as we have explained, contrary to the Applicant's suggestions, what has actually happened is that the proposals have become significantly worse for us over time, not better. When the Proposals were first presented to us, in 2022, they excluded field E23, and 'Parcel 3' as a whole was very much smaller: essentially only the substation. See **APP-088** (2022 bat survey) and **APP-089** (2022 wintering birds survey) and in particular their figures which show the originally proposed site red line and demonstrate the limited extent of 'parcel 3' as first explained to us. Yet despite our explanations at the time and over the years, the Proposals have been expanded into the Holding, becoming much worse for us. However, the ExA will not see this explained in the explanation of 'reasonable alternatives considered' **APP-047** (see in particular 4.7): it is not even acknowledged there. Clearly, though, a proposal without E23 (and the rest) was thought viable, and was the basis for the project at its inception.

A6.7 Simply in terms of the Environmental Statement and the requirements of regulation 14 of the EIA Regulations, it is clear that this option was considered, and it is also clear that it is and was a "reasonable alternative" (the test for which is, ultimately, objective). That is readily apparent from: (a) the fact it would plainly meet the project's objectives, even taking the Applicant's definition of those objectives in **APP-047**, at 4.3.1, and even being generous to the Applicant and allowing it a capacity objective that extends beyond what is said in **APP-047** at 4.3.1 (a NSIP solar project generating up to 500MW), to the '250MW-500MW' set out in its Planning Statement **REP1-016** at 4.1.3, and (b) that the Applicant initially proceeded on the basis of that scheme, not just by communicating it such that it was what was explained to us in 2022, but also including by incurring the expense and time of having ecologists conduct surveys for that site layout.

A6.8 However, the principles that govern compulsory acquisition, and the considerations under EN-1 (2023) 4.2.15, and the mitigation hierarchy, go beyond the requirements of the EIA Regulations. The Applicant cannot hide behind silence or frankly implausible explanations regarding the departure from the original proposal. What was suggested at ISH1, that the original proposal was simply for 'survey purposes' cannot possibly be squared with what we were told, with the fact it appears, clearly shown, as red-lined 'site location' on the figures to the wintering birds and bat surveys, and the inherently improbability that significant sums would be spent, and time incurred, surveying a site layout that was not in fact the site layout.

A7. BESS update at ISH1

A7.1 The Applicant's proposed 50m setback they now mention is an important concession that the interface between the BESS and our holding is significant. However, it does not answer our core concern. The Applicant still has not assessed the relevant receptor or the

relevant endpoints. Its assessment remains focused on human exposure thresholds, not donor animal suitability, welfare, stress, blood composition, product quality, evacuation or confinement practicality, contaminated firewater, contaminated land, loss of grazing or feed production and business continuity. A 50m setback may reduce proximity, but it does not convert a human health plume assessment into a PFL/TCS-specific assessment.

A7.2 Regarding insurance and risk allocation - at ISH1 the Applicant indicated that it did not then have a comment on the business insurance point and suggested that it was more appropriate to discuss that directly with the parties rather than in the Examination. While we welcome this discussion, it does not provide us with security or a guarantee. If the Order authorises the BESS in this location, the risk will be created by the authorised development. The same point applies to other components of the project that create risk for us elsewhere. We should not be left to negotiate after consent for insurance or equivalent protection that the Applicant may or may not agree to provide.

A8. Conclusion

A8.1 We do not feel that on the evidence available that the Applicant has justified its refusal to PFL / TCS requested changes on a minimum-interference basis. We do not wish to repeat our requests here however reiterate that we do not believe the current layout shows the minimum necessary/acceptable risk to/interference with PFL/TCS that the law and policy on compulsory acquisition, EN-1 (2023) 4.2.15 and the mitigation hierarchy require.

Rosefield Solar Farm DCO Examination
Preston Farms Ltd ("PFL") and TCS Biosciences Ltd ("TCS")
Appendix B — Timeline of Engagement

As discussed in ISH1-2, the chronology is relevant because the Applicant cannot say that these issues emerged late. We (PFL/TCS) raised the operational sensitivity of the holding, Field E23, access, biosecurity, noise, animal welfare and related matters while the scheme was still evolving. Importantly, we raised serious operational concerns when the project footprint affecting the Holding was presented as materially smaller than the scheme now before the ExA, with a much smaller Parcel 3.

The timeline shows that we were not raising ordinary agricultural inconvenience issues. As previously discussed, we were explaining the impact clearly on a specialist farming operation, that is best thought about as a form of laboratory in farm form, and integrated biomedical production facility.

The Applicant had ample opportunity to avoid or reduce impacts at source. Instead, despite engagement and consultation, the Proposals reached further into the heart of the Holding, through a much expanded Parcel 3, and the Applicant has then essentially retained this layout, saying it maximises its capacity, and sought to manage the resulting impacts on us through later liaison/management type mitigation. The sequence of maps at the end of this Appendix illustrates the same point.

Timeline

Date / period	Key engagement / fact	Relevance
22 February 2022	PFL granted permission for survey work in the two fields behind Sion Farm, at that stage, the only land on the Holding affected by the proposed scheme. This is corroborated by the Applicant's own 2022 Wintering Bird Survey material (ES Volume 4 Appendix 7.3: Wintering Bird Survey Report (2022) [APP-089]), and also the 2022 Bat Survey ([APP-088]). Parcel 3 is described as containing "two livestock fields" adjacent to the National Grid East Claydon Substation, and the figures clearly show this (and note this did not include e.g. field E23). [See Map 1 below]. We were very concerned about this, but those concerns are nothing compared to our concerns about the present Proposals.	This is important early context. The scheme as presented to PFL in 2022 as relevant to PFL (i.e. the 'Parcel 3' part) was materially smaller than the current scheme, and (necessarily) there was no proposal for access via Granborough Road and into our Holding there. The 2022 survey mapping and description corroborate what we (PFL/TCS) were told and understood at the time.
30 March / 6 April 2022	Following a walk-around of those two fields, we (PFL) explained our concerns to the Claydon Estate (who were acting as agent for the project as well as our landlord). PFL explained that removal of those fields could reduce horse capacity by approximately two herds out of six	We identified operational sensitivity, herd-capacity impacts and the link with TCS supply when only two livestock fields were understood to be affected. The later

Date / period	Key engagement / fact	Relevance
	once construction and access disruption were factored in. This was estimated at roughly 20% of farm revenue, with knock-on effects for TCS, which buys all farm product.	expansion of the scheme over the holding therefore occurred after the Applicant and land interests were already on notice that even the smaller 2022 proposal raised serious operational consequences.
November 2022	An option over the majority of the site was recorded. At this stage, the acreage of the site affecting the PFL holding had expanded materially beyond the two fields previously identified	This is a critical design evolution point. We had already raised serious operational concerns when the scheme affecting the Holding was understood to be smaller. The Applicant's later Examination material includes what is meant to be an explanation of Reasonable Alternatives considered [APP-047] and Design Evolution Figures [APP-064], but we have not seen any figure showing the move from the smaller 2022 Parcel 3 position to the materially wider design now affecting the Holding (let alone an explanation for the change).
5 September 2023	The Claydon Estate toured the PFL/TCS operation and received a TCS presentation. We explained that TCS was founded in 1965, reaffirmed that PFL/TCS are a major producer of donor animal blood and serum products, that products from Botolph Claydon are used in the UK and internationally, that PFL had approximately 3,500 sheep and 400 horses, and that PFL acreage is dedicated to donor animal production, summer pasture, winter housing, winter feed and bedding.	The operation was explained before the first public consultation. The Applicant side had the opportunity to understand the holding as a specialist operating system, not ordinary grazing land.
28 September 2023	First public consultation / project announcement. [See Map 2 below]	Our concerns were raised at a very early stage, and were well capable of informing design from the outset.
9 October 2023	Meeting with Gateley Hamer.	Continued early engagement before the design was fixed for examination purposes and flagging of sensitive nature of businesses and operational issues.
14 December 2023	Formal pre-application meeting with the Rosefield project team and EDF. We provided a 17-slide briefing. It explained TCS's clinical diagnostic role, blood agar plates, donor blood use, the integrated PFL operation, donor animal welfare, biosecurity, supply continuity, land impacts, employee risk, growth constraints, and customer demand for increased capacity. The briefing included the NHS diagnostic context.	Detailed formal notice at a design-formative stage. The Applicant had enough information to test alternative layouts and avoid core impacts.

Date / period	Key engagement / fact	Relevance
September 2024	Replacement land was discussed.	Replacement land was not the starting point. It emerged as a way of mitigating around the Applicant's retained layout.
9 September 2024	Meeting with EDF and Gateley Hamer.	We were already concerned that earlier non-statutory engagement had not been reflected in the evolving design.
18 September 2024	We emailed EDF / Gateley Hamer stating that concerns had already been discussed "in detail" during non-statutory pre-application engagement, that PFL/TCS had been assured they were being listened to, and that the September meeting suggested this had not happened. We attached the December 2023 concerns and asked for high-level detail on what could be done before further meetings.	We expressly challenged the lack of design response before the second consultation closed.
18 September – 5 December 2024	Second consultation on the proposals, including the PEIR and an updated layout. [See Map 3 below]	This was a key design window. If consultation was to have a meaningful design function, it should have been used to avoid or reduce the E23 and access impacts, not merely to shape later mitigation.
4 October 2024	Meeting with EDF and Gateley Hamer to discuss the current design and the requirements of the PFL/TCS business in more detail.	The Applicant had direct notice of the specific design issues before the end of the second consultation.
10 October 2024	Applicant email recorded our main concerns: grazing land, horse and sheep movement between fields, biosecurity, noise, vibration, lighting and dust. It recorded the sensitivity of E23 as a main crossing point between grazing fields, concern about the cable route and access track between Parcels 2 and 3, a suggested access route to Parcel 3 from the north, and our resistance to compounds in Parcel 3, especially E23 and the corridor between Parcels 2 and 3.	Direct written acknowledgement of the key issues. E23, access, biosecurity, animal movement and disturbance were plainly in issue before statutory consultation closed.
16 October 2024	We replied that the Applicant should "act upon" the information provided and remove its proposals for Field E23. Our position was that E23 should remain available for its existing operational use. If, contrary to that position, any access through E23 were required, we indicated that it should be limited to a stone access along the bottom/east hedge, to minimise interference with the field's function. We also raised healthcare supply consequences, noise, light, disease, contamination and business continuity insurance.	We sought avoidance of E23 impacts, not merely mitigation. The reference to a limited stone access was a fallback position, not acceptance that access through E23 was appropriate. The request was specific and timely.
29 October 2024	The Applicant indicated that it should be possible to locate the construction compound in Parcel 3 in the northern fields, outside E23 or the land between Parcels 2 and 3. It also stated that it would seek to locate the main operational compound in Parcel 2 and not Parcel 3, and	The design was still capable of responding to our concerns. The issue was not raised too late. However, the Applicant's refusal to change meant the core E23 issue

Date / period	Key engagement / fact	Relevance
	that it was continuing discussions with National Grid about locating the substation in E11 rather than E23.	remained: solar PV, access, construction use and operational interference were not removed.
6 November 2024	The Applicant invited us to a joint meeting with the Claydon Estate and Rosefield representatives to discuss remaining issues and "if/how" they could be mitigated.	The Applicant recognised unresolved concerns. The framing remained mitigation focused rather than avoidance of the core E23/access impacts.
5 December 2024	PFL/TCS submitted a formal statutory consultation response objecting to the proposals. We stated that the PEIR did not sufficiently identify the role of PFL/TCS locally or nationally, including the strategic role in the UK healthcare system. We explained the Home Office licensed donor-animal operation, the use of all relevant land for grazing and feed production, the role of TCS in sterile animal blood and serum supply, the estimated 78–104 million blood agar plates per annum, and concerns about donor animal welfare, noise, light, glare, construction disruption, animal movement, traffic, biosecurity, land loss, E23, business continuity and employment.	Formal statutory consultation notice of the whole-system objection. The Applicant had clear notice before application submission that this was not an acreage issue, but an integrated donor animal, laboratory and healthcare supply chain issue.
21 May – 16 July 2025	Targeted consultation / Stage 3 Design. The Applicant removed BESS/substation options from E23 but retained solar PV, construction use and the Granborough Road / Parcel 3 access issue.	Shows that design change was possible. However, the targeted changes we requested were not made. Partial design movement did not avoid the core impact.
May 2025 community update	The Applicant stated that it had reviewed feedback from the second consultation, continued stakeholder engagement and carried out additional environmental surveys. E23 remained in the scheme. [See Map 4 below]	Consultation did not lead to avoidance of the core impact.
30 October 2025	Further meeting with EDF and Gateley Hamer as part of pre-examination engagement.	Continuing engagement over an extended period. Not a late stage ambush.
March 2026	We submitted our Written Representation with detailed evidence on the operational holding, E23, access, biosecurity, animal welfare, noise and the inadequacy of deferred mitigation.	Detailed evidence did not produce a design response. The Applicant maintained the core layout, including solar PV in E23, E23 construction use, Granborough Road access and broad rights across the holding.
April 2026	We answered ExQ1, renewing concerns about E23, access, operational sensitivity, biosecurity, animal welfare and future mitigation.	We continued to provide information. The Applicant continued to rely on future mitigation, management plans, liaison and a corridor based approach.

Date / period	Key engagement / fact	Relevance
21 April 2026	Gateley Hamer asked us about a potential temporary opportunity to occupy additional land during construction, to give more room for grazing / management while construction works took place in Parcel 3.	A late attempt to mitigate around the retained layout during the Examination. This does not show avoidance; it shows continued search for operational management solutions after the design had been maintained.
Deadline 2	The Applicant accepted that E23 would not remain open grazing in the same way if solar PV were installed. It nevertheless refused to remove E23 and relied on a proposed livestock corridor. It also stated that further detail on E23 use would be welcome. The Applicant's position was that E23 is required to ensure efficient land use and "maximum CNP infrastructure benefit".	Confirms the lack of functional equivalence. A corridor through solar infrastructure is not the same as retaining E23 as a working field. The Applicant is asking for information after reaching its conclusion. CNP optimisation is not the same as necessity or minimum interference.

Conclusion

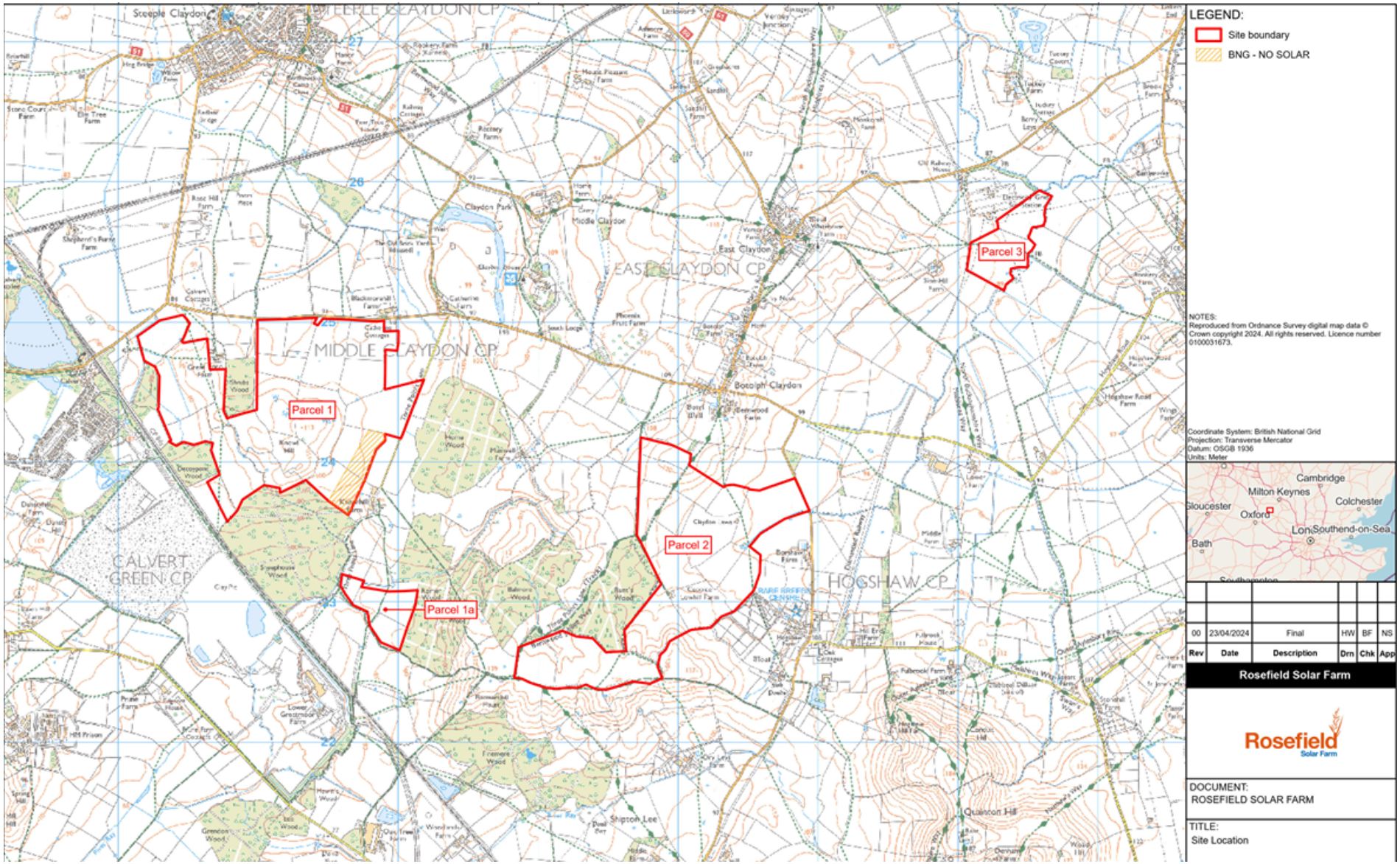
As discussed in the ISH1-2. The timeline shows that we (PFL/TCS) did not raise these issues late. We raised them while the scheme was still evolving and while the Applicant could still have used consultation to avoid or reduce the core impacts. Instead, the Proposals have expanded from a materially smaller 'Parcel 3', into the heart of our Holding, with an access of the Granborough Road similarly into the heart of our Holding, andthe Applicant's response has been to retain its preferred layout and to offer later mitigation.

The early 2022 material is particularly important. It shows that we were raising serious operational concerns when the scheme affecting the holding was understood to be materially smaller than the scheme now before the Examination. The sensitivities were known before and during the consultations phases.

This also explains why we object to continued reliance on future engagement. We have already spent years explaining the operation. We should not now be required to act as an unpaid project management and risk management resource because the Applicant failed to design around a known sensitive receptor at the proper time, not least when we know the mitigation is inadequate as avoidance should have been designed-in.

Maps

First Proposal to PFL (2022)



Launch Leaflet (September 2023)

Location plan

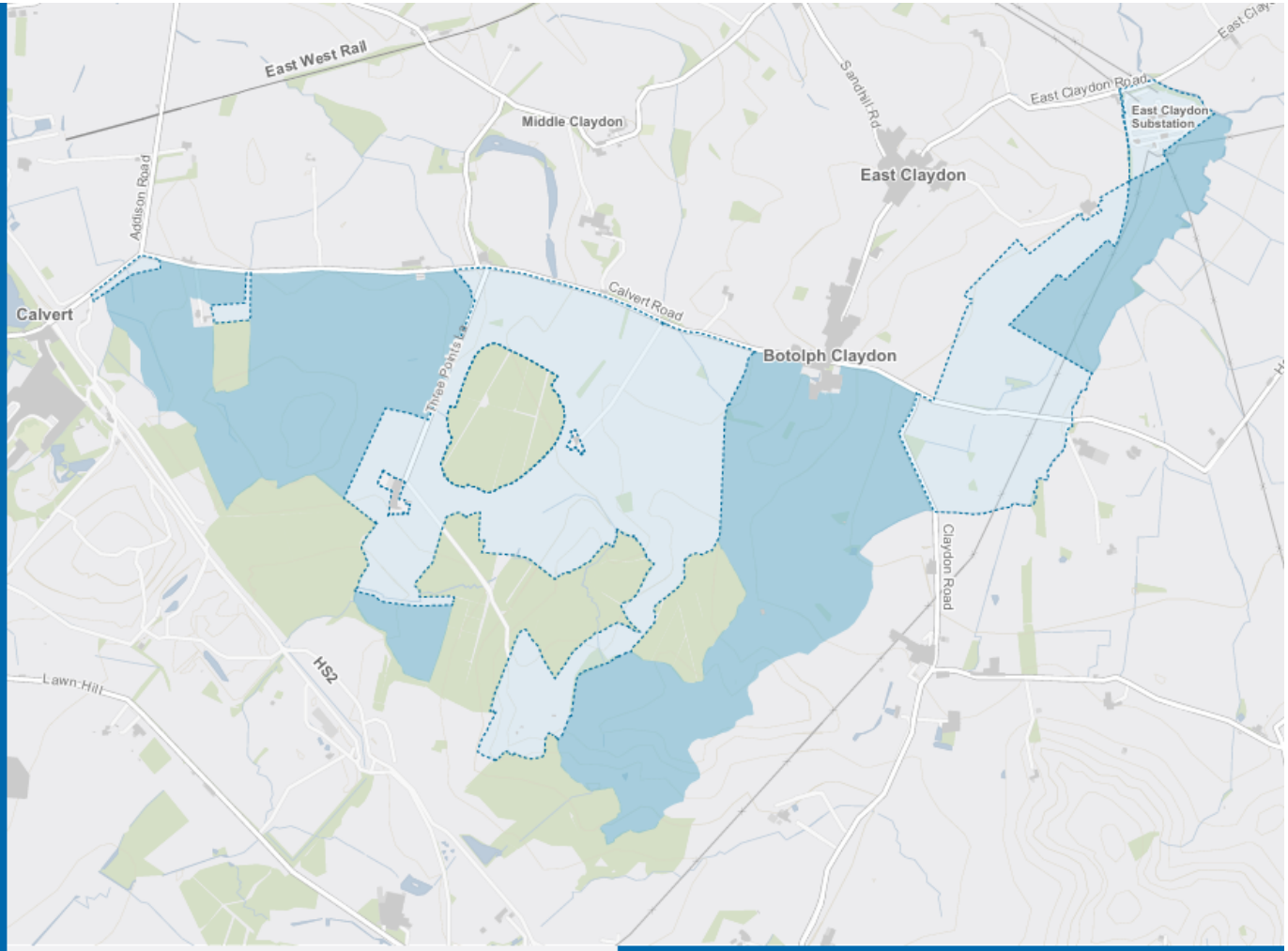
The plan on this page shows the area we are considering for Rosefield Solar Farm.

We expect to use only around half of the site for energy generation and storage.

We will also be looking for opportunities to boost biodiversity and provide environmental mitigation, such as planting new habitats to support local wildlife.

In other areas, we are working to find the most appropriate locations for the underground cabling that will connect the site to the grid. We will also use some of these areas temporarily during construction.

We will share more information about Rosefield Solar Farm, including our early design, during our consultation which will start on Thursday, 28 September 2023.



Working with local landowners

The land is predominantly owned by Claydon Estate. Rosefield Solar Farm will play an important role in supporting the estate's vision for a sustainable future.

Design Post Consultation (September 2024)

Community Update (May 2025)

Appendix C — Operational Detail Notes

Supplementary operating notes for the site visit

C1. Purpose of this Appendix

This Appendix provides supplementary operational detail to the recent site visit.

It does not repeat PFL/TCS's main case. It should be read alongside our response to Rosefield, Appendix A on site selection and necessity, and Appendix B on chronology.

Its purpose is practical. It explains what the site visit showed, elaborates on what may not be apparent without explanation, and why particular features of the holding matter operationally: vehicle movements, contamination pathways, feed production, field flexibility, donor-animal handling, laboratory interfaces and replacement land limitations.

There is no better way to understand PFL/TCS's operation than to see the holding on the ground. Walking and driving around the holding will have provided a practical sense of how the farm, donor animal system, product movement routes and laboratory interfaces work together. That cannot be understood from plans alone.

The site inspection was brief and there may not have been enough time to view the PFL/TCS holding in sufficient detail. We would welcome the ExA and the Applicant back for a further site specific inspection if the ExA considers that useful.

We provide visual material herewith to assist the ExA and Applicant and support the recent site visit so that what is seen can be properly understood. This includes:

1. Aerial view of E23 marked to shows primary (not exclusive) access and exits, for livestock, machinery or both;
2. Photograph of crop condition ahead of the first grass cut for the silage clamps;
3. Photograph of silage clamp being filled, first cut. May 2026;
4. Photograph of a structured herd in the field;
5. Aerial image of Granborough Road marked to show relevant farm movements and interfaces;
6. A photograph of E23 from 2025 when E23 was in grass (while first cut being taken);
   A photograph of E23 taken very recently (2026) following its seeding with alfalfa (lucerne);
7. Photograph of land fenced off by National Grid – Too narrow for the herd; and
8. Material showing the approximate 90m replacement-land access connection.

We have provided substantial operational detail to assist the Examination. Some aspects of the Home Office licensed operation, donor-animal procedures, security arrangements, customer supply arrangements and product traceability systems are commercially,

operationally and security sensitive. We have therefore sought to provide enough detail to explain the operational risk without unnecessarily disclosing sensitive information.

If the ExA considers that further operational detail would assist, we would encourage a further site-specific visit or, if necessary, a closed or otherwise controlled session dealing with sensitive matters. We would expect any such process to include the Applicant where appropriate, but to be managed so that sensitive licence, security and operational details are not unnecessarily placed in the public domain.

Donor Session

We believe observing a donor session was useful as it showed that the process is specialist and time sensitive.

The handling of animals, use of equipment and pace of work are all directed to reducing contamination risk and minimising stress. The process is clearly not an ordinary farm task and has been refined over 60 years of operations. It forms part of a Home Office licensed donor animal system and the first stage of TCS's quality controlled production chain.

In addition to the specialist personnel, there is a significant amount of specialist equipment involved. It is not possible or appropriate in this Appendix to list every item or explain every function, many parts have been custom built for what is a relatively unique process. What should be apparent from the site visit is that specialist equipment is used to control the process safely, maintain calm handling, minimise stress and reduce the chance of contamination. It should also be apparent that reduction of contamination risk extends to equipment after and outside of donor sessions.

Blood collection volumes are calculated by reference to the body weight of the donor animal and the conditions stipulated in our Home Office licence. Horse collection volumes are higher than sheep volumes because of the size of the animals, but the process remains controlled, welfare led and designed to minimise stress. The point from the site visit is that this is not an informal or discretionary farm process. It is a measured technical procedure carried out by trained and licensed personnel within the Home Office framework, in which it is vital the animals arrive, pass through and leave in a healthy and unstressed condition.

Some features of the process were visible. Others may not have been so obvious without explanation. For example, it may not be apparent to a non-specialist how technical systems reduce the time needed for collection, why collection materials are sealed to maintain a closed and controlled process, or how those steps reduce contamination risk.

Neither will all of the stress minimisation measures be obvious from observation. The use of familiar people, familiar handling routines, calm movement, controlled timing, appropriate equipment and predictable conditions are all part of the system. These processes have been refined over decades of operating experience.

It will have been obvious that donor animals are individually identified, including by tagging in the case of sheep and microchipping in the case of horses. What will not be obvious is the relationship between identification, traceability and biosecurity.

Records are kept so that there is a traceable link from donor animal through to end use of the product in a customer's laboratory. The site visit demonstrated the start of that process on the farm and how it continues into TCS. As identified during the visit, we do not rely only on an electronic system. Physical records and quality documentation are also part of the traceability system.

A great deal could be said about how those records are used and why they matter. One example is pathogen monitoring. Specialist staff monitor relevant pathogen information, contamination findings and quality control data. Blood collected from sheep donors may be pooled into batches. Horse blood is handled differently because the quantities per animal are higher. If a batch or product is found to contain a pathogen or contaminant, the traceability system allows investigation back through the process and, where relevant, to the specific donor animals. During the inspection we observed a sheep being removed from the session and placed in quarantine. This was a result of TCS quality highlighting a potential issue with that specific animal. When the ear tag was scanned, it alerted the PFL to a potential issue with the animal that needs to be investigated further.

We have refined the system over time so that can now offer a "Quality Assured" release status. Given the time sensitive nature of the product, that means customers may begin using material before final QC and sterility results are available, within our quality system. That product depends on confidence in the whole upstream process.

We include this detail because we have repeatedly explained to the Applicant that we manage pathogens, contamination risk and product integrity within a specialist system understood by trained teams. The introduction of, or avoidable increase in, additional pathogen or contamination risks cannot be justified simply by later liaison or generic mitigation. We also include this detail, because it is precisely because we have these systems that we are able to say, with complete confidence, that e.g. increase in stress results in deterioration in product.

Tour of holding

Having seen a donor session, the subsequent tour of the holding will allow the ExA and the Applicant to see the scale, orderliness and connected nature of the PFL/TCS operation.

The holding may have appeared familiar in some respects because it involves fields, fences, livestock, machinery and tracks: it looks like a normal farm until you pull back the curtain. The important point is that those ordinary looking features form part of an unusual regulated operating system. The farm is not a set of interchangeable fields. It is the upstream part of a controlled donor animal and diagnostic supply chain.

The site visit should have helped to explain:

a) the size and behaviour of structured horse herds;
b) the difference between loose herd movement and individually controlled ridden horses;
c) the role of maintained fencing, gates and field connections;
d) the relationship between E23 and adjoining fields;
e) the position of Granborough Road and the silage clamps;
f) the movement of feed, staff, machinery, animals and donor products; and
g) the physical relationship between the farm and TCS laboratory buildings.

The structured herds are important. Seeing a large number of horses together in managed herds should help explain why generic equestrian guidance does not address the operational issue here. PFL is not a riding school, racing yard, stud farm or ordinary livery yard. The issue is not whether horses or sheep are versatile animals in general terms. The issue is whether this donor animal system can safely absorb additional construction interfaces, personnel, noise, traffic, dust and field fragmentation.

The tour will have explained why we treat outside contact as a serious biosecurity issue. Our biosecurity controls are based on best practice and decades of operating experience. Careful sourcing, vaccination, quarantine, animal welfare management, traceability and environmental control have enabled us to maintain a stable donor-animal system and avoid the kind of disease disruption that can compromise supply chains and has affected other animal-based operations in the UK. New animals are strictly tested and quarantined before entering the main donor-animal system. Horses are required to be vaccinated before arrival against key equine diseases, including equine influenza and equine herpesvirus, and sheep are vaccinated against bluetongue virus. The same principle applies to avoidable third party construction interfaces: the risk is not limited to visible mud or direct contact with an animal. It may arise through people, clothing, boots, vehicles, equipment, soil, dust, water, feed, insects, shared surfaces or airborne/droplet routes, depending on the disease. Appendix D provides illustrative examples of equine and ovine biosecurity risks and transmission pathways. This is why our staff are so carefully recruited and trained: it is about having the right individuals on site, as much as having the right processes in place.

It should also have been apparent how fences, gates, yards, tracks and fields are maintained and managed. The farm is subject to active supervision. Our concern is not that ordinary farm management becomes impossible in the presence of a solar farm. The concern is that Rosefield introduces avoidable construction, traffic and personnel interfaces into a regulated donor animal system and then proposes to manage those interfaces later.

The Granborough Road access and the silage clamps should also be viewed together. Food production is critical to the donor animal operation. Granborough Road, the clamps, the fields and the laboratory interface are part of a connected system.

C2. Environmental monitoring and external contamination pathways

TCS monitors laboratory environmental quality as part of its ISO certified quality management system, including ISO 9001 and ISO 17025. We are also certified to ISO 14001 and ISO 13485, additional detail is provided below:

Standard	ISO Definition*
ISO9001:2015	ISO 9001 is a globally recognized standard for quality management. Implementing ISO 9001 means your organization has put in place effective processes and trained staff to deliver flawless products or services time after time.
ISO14001:2015	ISO 14001 is the internationally recognized standard for environmental management systems (EMS). By adhering to this standard, organizations can ensure they are taking proactive measures to minimize their environmental footprint, comply with relevant legal requirements, and achieve their environmental objectives.
ISO/IEC 17025	This standard is vital for laboratories as it enhances the credibility of their testing and calibration work. Compliance with ISO/IEC 17025 demonstrates a laboratory's commitment to quality, technical proficiency, and scientific rigor.
ISO13485	ISO 13485 is the internationally recognized standard for quality management systems in the design and manufacture of medical devices. ISO 13485 is crucial for manufacturers and suppliers of medical devices as it establishes a framework to ensure consistent design, development, production, and delivery of medical devices that are safe for their intended purpose.

Excerpts from the ISO Website Definition of each Standard

Routine monitoring includes air sampling and measurement of colony forming units, or CFU, per cubic metre. Environmental data is monitored against contamination findings in blood products and other quality controlled lines.

Environmental contamination can arise from the donor animal environment, the external environment around the laboratory buildings, and the laboratories themselves.

The concern is not limited to contamination inside the laboratory - construction activity close to donor animals can also affect the animals directly. Soil disturbance, dust, fungal spores, bacteria and other bioaerosols may increase the environmental load around grazing areas,

movement routes, housing approaches, feed or water points. Those materials may come into contact with animals through inhalation, coats, hooves, mucous membranes, bedding, feed, water or minor wounds. That increases the risk of infection, environmental contamination and the need for veterinary intervention.

That direct animal pathway matters because donor animal health is clearly part of the product quality. Any increase in disease risk, stress, antibiotic use, exclusion of animals from donation, or disruption to herd/flock management can affect the supply chain. Clearly a blood product containing the bacteria (or growth inhibitors, such as antibiotics) that the product is designed to detect is not viable and could have serious diagnostic consequences.

There is also a laboratory pathway. External airborne particulate, dust, soil-derived material, fungal spores, bacteria and other bioaerosols can affect laboratory conditions and increase product-contamination risk. TCS is aware of common environmental contaminants, including *Bacillus licheniformis* and moulds, which can cause contamination through external pathways.

The laboratory air management systems are designed to maintain clean environments. Their effectiveness depends on the external load they are required to manage.

The implication for Rosefield is practical. Sustained soil disturbance, vehicle movement and dust-generating activity close to donor animals and the farm/laboratory system would increase the external particulate and bioaerosol load that our systems are designed to control. This includes risk to our laboratory air management systems (given the position of our laboratory in relation to the Proposals).

This pathway is consistent with published construction site research. Haas et al. state that “during construction work, the number of dust particles in the air can increase”, leading to “a higher load of bioaerosols being transported”. Their study measured “particulate matter, bacteria and fungi” around a large construction site. The point is that construction dust can carry biological material, including bacteria and fungi, into nearby environments.

C3. Farm hygiene and Home Office operating discipline

Preston Farms operates within the Home Office licensing framework under ASPA 1986.

The licensed framework depends on defined responsibilities, trained personnel and technical competence. It includes specialist named roles, including the Named Veterinary Surgeon, Named Animal Care and Welfare Officer, Named Training and Competency Officer and Named Information Officer. Thes roles are part of the regulated operating structure for animal health, welfare, husbandry, information, competence and oversight.

The relevant procedures are performed only by appropriately trained and authorised personnel within the Home Office framework. Individual licence holders are authorised to carry out the regulated procedures, and the operation depends on maintaining their competence, availability and oversight.

The Home Office licence regime requires twice-weekly visits by the Named Veterinary Surgeon. The whole operation must remain inspection ready at all times. Animal welfare, stress minimisation, herd/flock control, biosecurity and traceability are not only optional management preferences, they are also part of the operating discipline required to comply with ASPA licence conditions and to produce a consistent, high quality end product.

In practical terms, this means:

a) herds and flocks are differentiated and managed deliberately;
b) animal movements are controlled and planned;
c) plant, yards, sheds and handling areas are maintained to very high agricultural standards;
d) cleaning and disinfection are routine operating controls;
e) new animals are subject to strict testing and quarantine before entry into the main donor animal system;
f) unnecessary external access is avoided; and
g) the farm must support traceability down to individual animal donors and through to TCS's quality-controlled production chain.

The practical consequence is that PFL/TCS cannot simply change handling routines, locations, timing, staffing, access arrangements or animal movements in response to third party construction activity without affecting the licensed operating system.

This adds operational detail to the point already made in the Written Representation: the holding is a specialist regulated farming operation, not conventional grazing land. We still do not believe the Applicant appreciates this.

C4. Product movement, shelf life and why delay matters

The existing evidence explains that defibrinated donor animal blood typically has a 28-day shelf life from collection, that red cell robustness reduces with age, and that TCS/PFL operate continuously, 52 weeks of the year.

The additional operational point is the daily process.

Donor animal blood is collected from different horses and sheep three times per week, across six collection sessions. Blood is defibrinated immediately at the collection site and transferred to TCS on an hourly basis.

On arrival at TCS, we observed that incoming materials are decontaminated before entering the clean laboratory environment. Horse blood and sheep blood are processed in dedicated laboratories to maintain segregation and control. Each batch is assigned a Manufacturing Batch Record and entered into the electronic system. The facility has been designed for product flow – finished, sterile product does not exit through the same route that the raw material enters, following the principles of GMP.

That process depends on trained people, manual control, physical movement of product, batch documentation, laboratory segregation and timely dispatch.

The practical point for the site visit is that Granborough Road, farm routes and the farm/laboratory interface are part of a time sensitive, specialised production chain, not merely local access.

C5. Granborough Road and forage movements

Granborough Road is an integral part of the operating system.

The silage clamps are filled at different stages from May to August. During those periods, tractors deliver crops to the clamps for up to 20 hours per day. Multiple vehicles may also operate in the clamp area to roll the material and make the clamps tight and anaerobic.

PFL uses grass, maize and wheat for clamp production. It also produces hay, haylage and lucerne/alfalfa bales. Some crops may be cut and added to the clamps up to four times in a summer.

These movements support winter feed production for the donor animals. They should be viewed alongside our existing evidence that all animal feed comes from the holding to minimise contamination and biosecurity risk.

The location of the clamps also matters regarding a point highlighted above. Proposed construction access and activity on both sides of Granborough Road would be in close proximity. During filling, the clamps are open and the crop is being moved, consolidated and sealed. Dust, disturbed soil, vehicle movements and airborne material during that period create a potential interface with feed production for donor animals.

The quality of the winter feed is absolutely paramount to the operation and ensures that we can continue to provide a high quality product all year round.

The feed system is actively managed. During the winter months, two dedicated staff members are responsible for feedstocks. This means any change in diet, inconsistency in forage or issue with feed quality can be noticed quickly. Feeding starts at approximately 5.30am and continues until approximately 6.30pm. Animals are fed twice daily.

While primarily for winter food, during the inspection we discussed the need for the silage clamp opened in June 2025, some three months early, due to and exceptionally dry summer, which impacted the quantity and quality of the grazing.

The additional point is practical: construction access on Granborough Road would interact with time critical farm traffic and the movement of blood products throughout the year. This effect would be particularly felt during key forage production windows from May to August.

The nature of Granborough Road means that we regularly need to rely on walkie-talkie/similar to coordinate our farm vehicle movements on it, even though it is very lightly trafficked

otherwise. The notion that the Applicant's construction vehicles could be added without significant adverse impact on us even only from a traffic point of view is fanciful.

C6. Land use, crop flexibility and margin for error

PFL operates at a very high stocking rate. Grazing is tightly managed and rotated.

Some parts of the holding are permanent pasture. Other fields are deliberately rotated through different cropping types to produce winter feed and later-season grazing. This flexibility matters because permanent pasture can lose vigour from around July, particularly in dry or difficult years and additional sources of summer food need to be opened up to the herds.

E23 is an example of this operational flexibility. It was in grass last year but as productivity reduced, it was changed to lucerne (alfalfa), which is becoming an important part of PFL's feed and nutrition programme. E23 can produce winter feed and then be grazed later in the summer. It provides its crucial role connecting different parts of the farm all year round, whatever the planting in it. It is not a case that one field is "arable" and another is "grazing": what the Applicant calls "arable" will be grazed after cropping, etc.

PFL has limited margin for error. Two dry years, poor growing conditions or loss of flexible cropping land would reduce resilience. In a full capacity donor animal system, there are no spare fields to give up without consequences elsewhere. Through market discussions with a French customer, PFL/TCS understand that climate and grazing resilience issues are already affecting some overseas blood production operations, prompting a discussion with us as a supplier.

C7. E23 as a field, not a corridor

The existing submissions already explain that E23 contains eight gates, functions as a linchpin for animal movement and cannot be replaced by a corridor through solar infrastructure.

E23 should be looked at as a working field with multiple functions:

a. movement;
b. grazing;
c. rotation;
d. resting;
e. cropping;
f. later-season grazing;
g. separation and management of animals; and
h. connection between adjoining parts of the holding.

A corridor may permit passage from one point to another. It does not replicate a field.

That is why we suggest the Applicant has converted a field inclusion problem into a corridor design and replacement acreage problem.

The Applicant's proposed 20m corridor is also manifestly unsuitable. We are not crying wolf, as shown by our approach to the pasture fenced off by National Grid, and also the access to the "replacement land". As discussed during the visit, The National Grid parcel is some 65m wide. It is too narrow for our herds, so we bar access. As regards the "replacement land", as the Applicant will know we have insisted on at least an c.90m width for the access (and even that is the absolute minimum). See the figures provided illustrating both of these points.

C8. Replacement land and functional access

Replacement land (while appreciated) is not equivalent unless it works within the system.

We have already explained that the "replacement" land offered is out on a limb, plainly not a "replacement" for the loss of E23 at the heart of our holding. It also has a bare minimum access width and will take much effort (and time) to bring up to standard).

The existing Deadline 2 answer records that PFL was still awaiting a draft agreement and that substantial improvements would be required, including fencing, gateways, water and significant groundworks, with no clarification as to responsibility for delivery.

We would be grateful if on the site visit the ExA consider not only acreage, but access and integration and the wider operating system (if there is time).

Replacement land requires:

a. secure tenure;
b. integration with the existing holding including:
    a. suitable access width;
    b. groundworks;
    c. gates;
    d. fencing;
    e. water;
c. biosecurity compatibility;

C9. Site visit points to note

The site visit should have given the ExA and the Applicant a practical appreciation of the PFL/TCS operation. We have already provided substantial evidence in their Written Representations and answers to ExA questions. The site visit serves a different purpose: it allows that evidence to be tested against the operational reality on the ground.

That reality is a highly controlled and specialist operation. TCS products are relied on by customers including the National Health Service. Interference with the holding can have consequences across the production system and the diagnostic supply chain it supports.

The Applicant's assertion that there is "no evidence" of an unacceptable risk to, or unacceptable interference with, human health and public safety cannot stand up to the factual situation on the ground. The question is not whether the current layout creates risk and interference, that is not in question, but whether that risk and interference are acceptable, necessary and properly mitigated. The site visit should assist in understanding why we say they are not.

During the site visit, the following practical points were observed:

a. the relationship between E23, adjoining fields, gates and movement routes;
b. the difference between a field and a corridor;
c. the location of proposed construction access relative to donor animal areas;
d. the use of Granborough Road for farm, forage, product and staff movements;
e. the location and function of the silage clamps;
f. the interface between farm routes and TCS laboratory buildings;
g. the way external doors and product movement create contact between external and controlled laboratory environments;
h. the difference between controlled farm vehicles and external construction traffic;
i. the nature and conduct of a donation session;
j. how the animals behave generally, including before, after and during donation;
k. our self-sufficiency as regards food;
l. our biosecurity;
m. the limited value of replacement land if access and integration are constrained; and
n. the limits of mitigation that depends on later protocols rather than avoiding unnecessary interfaces.

Appendix C - Operational Detail Note

Visual Materials

Image 1: Aerial view of E23 marked to show primary (not exclusive) access and exits, for livestock, machinery or both;

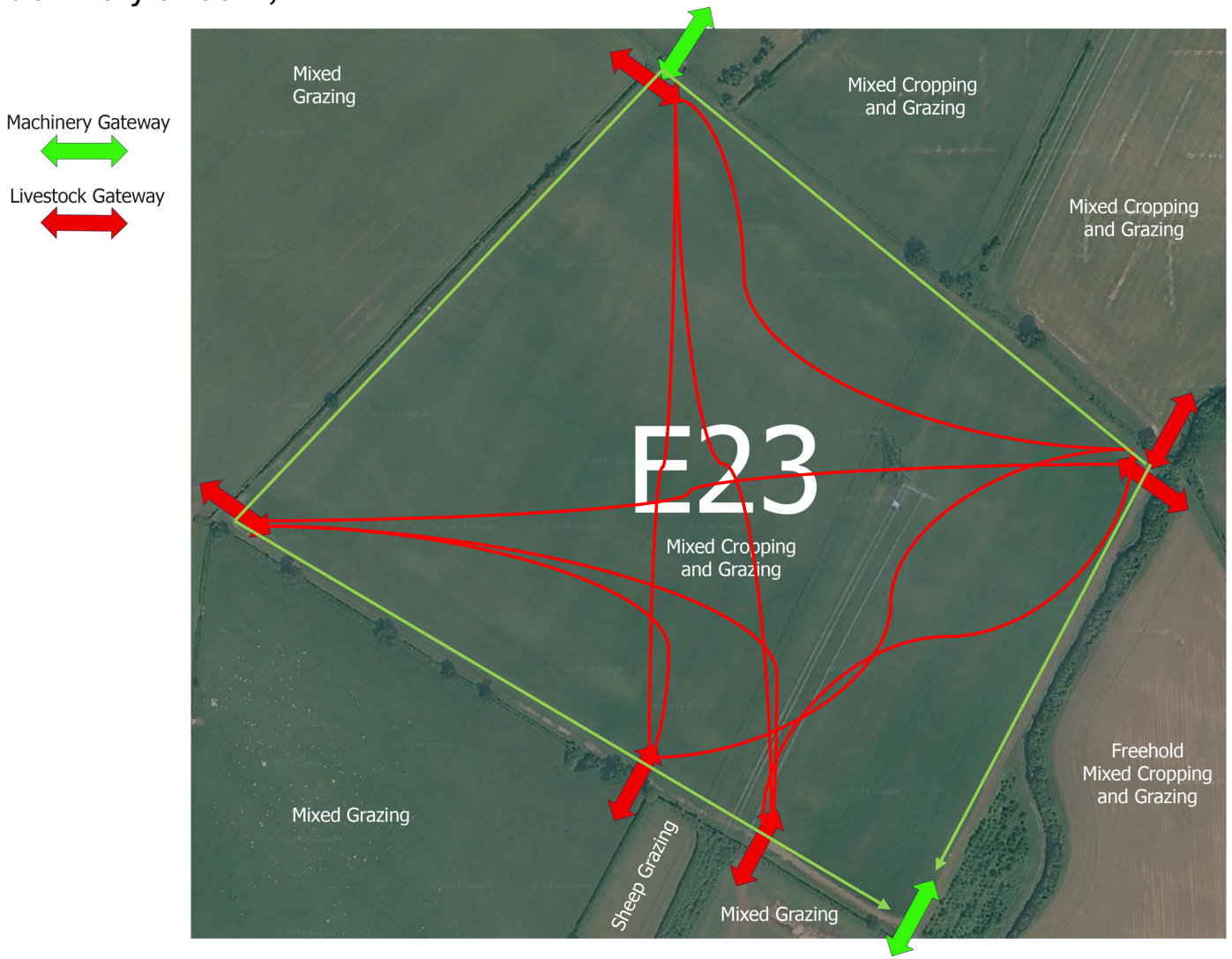
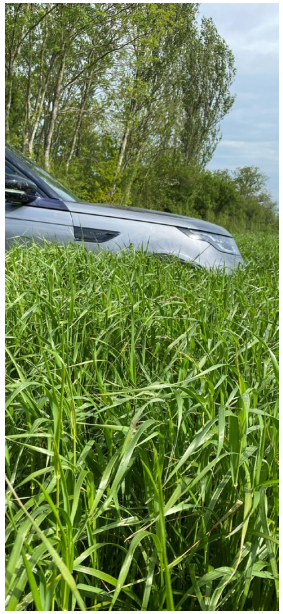


Image 2: Photographs of crop condition ahead of the first grass cut for the silage clamps



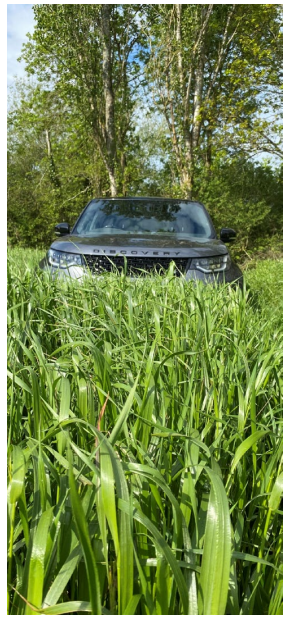


Image 3: Photographs of silage clamp being filled, first cut. May 2026 – (Stop 3 on recent ASI)

Image 4: Photograph of a structured herd in the field – Similar viewpoint to stop 5 on ASI (Sion Hill Farm)

Herd Number 3

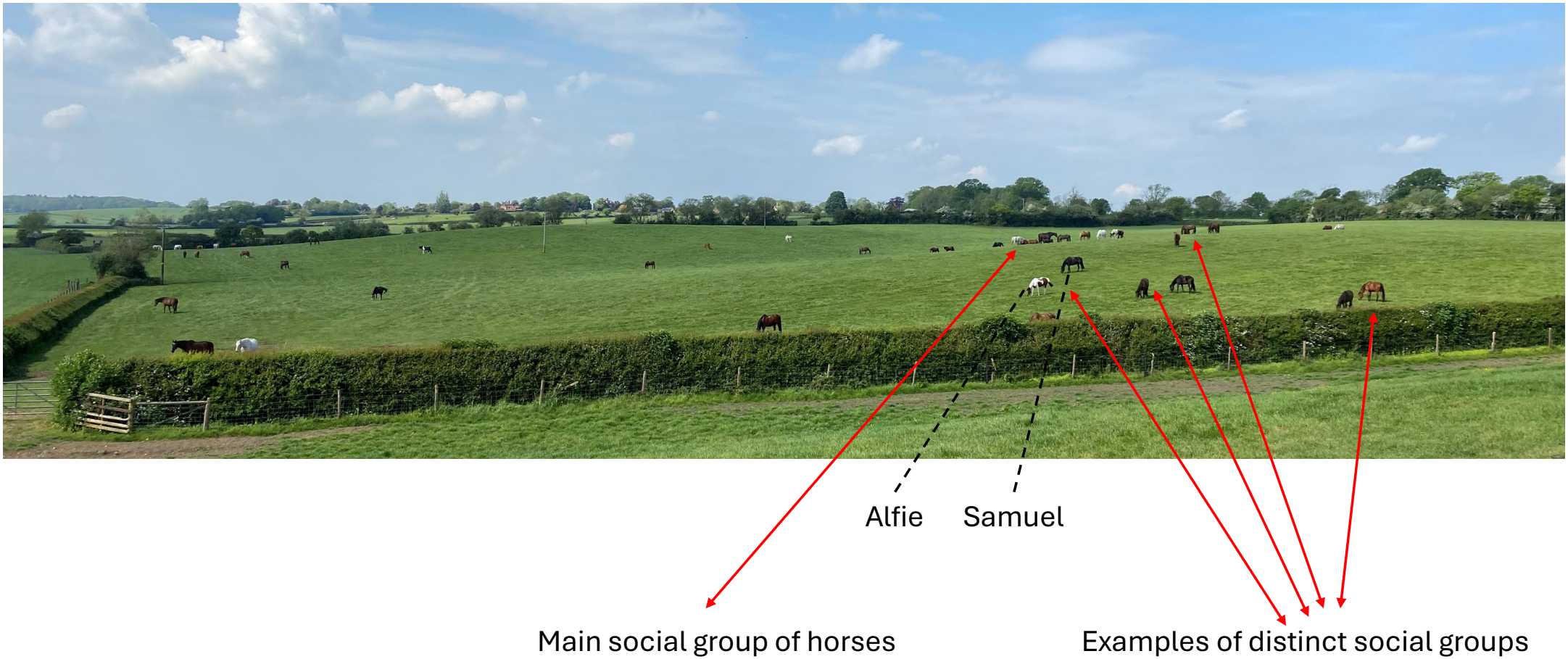


Image 5: Aerial image of Granborough Road marked to show relevant farm movements and interfaces

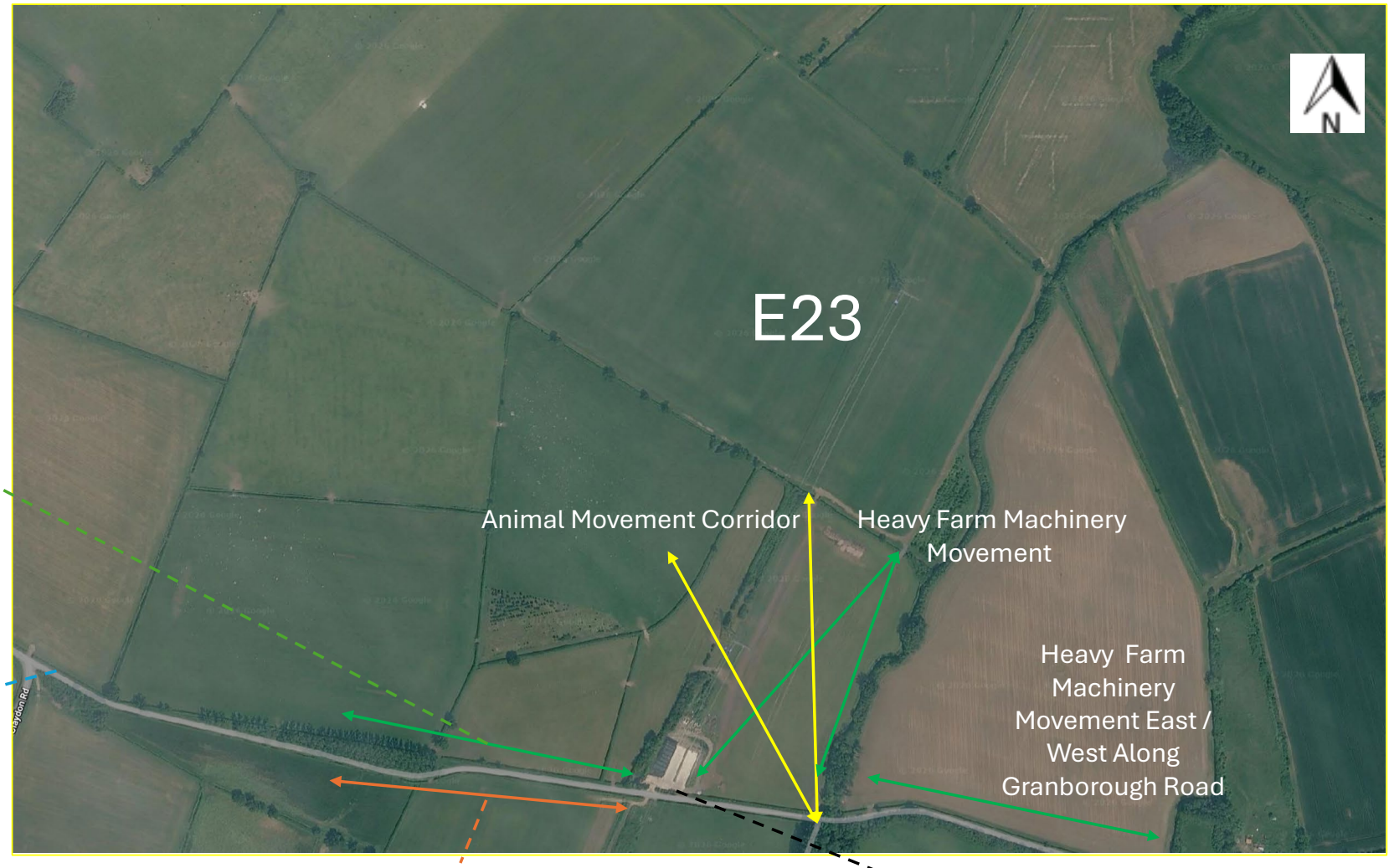


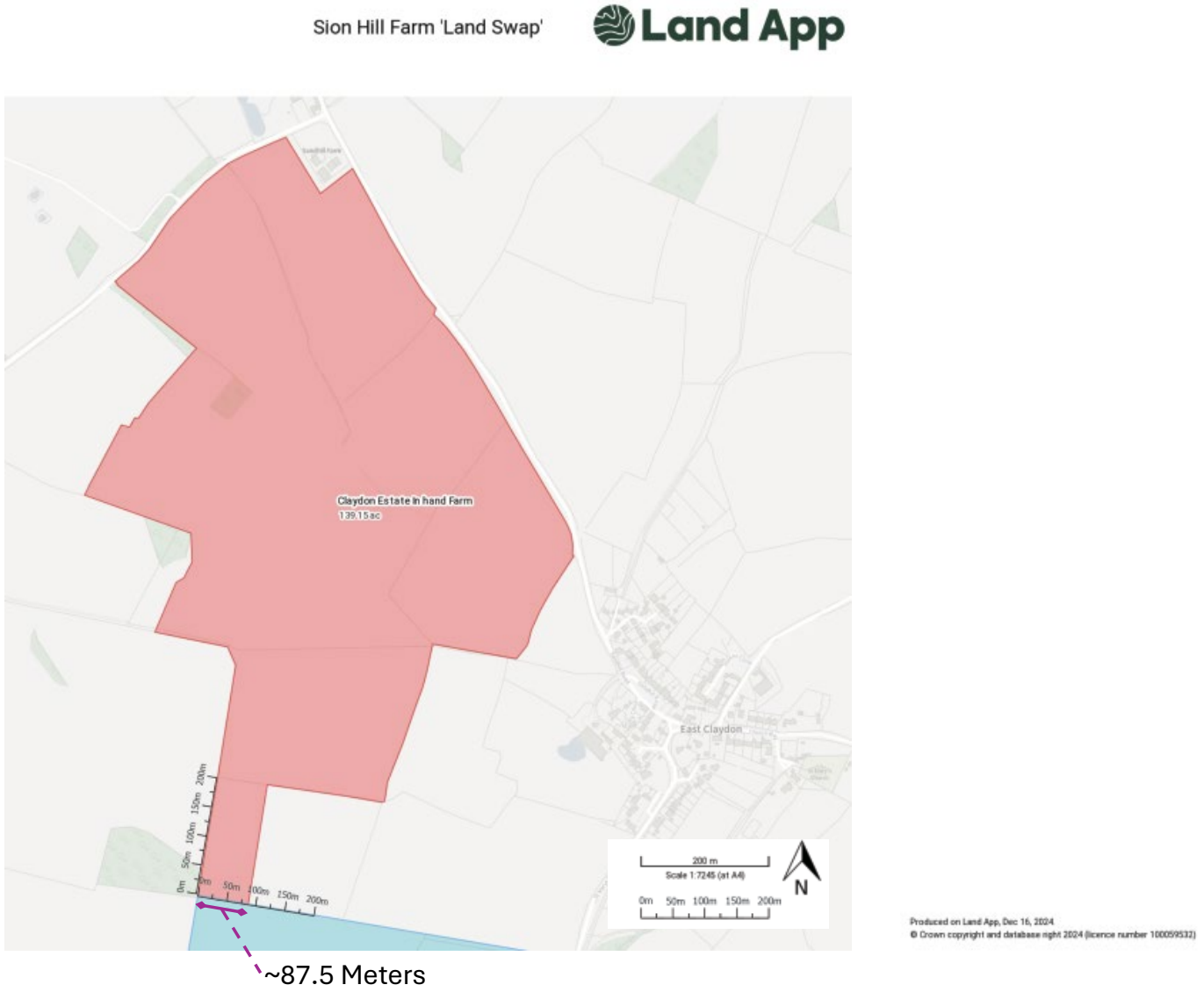
Image 6: Photographs of E23

2026: Current use after re-seeding

2025: In grass, while first cut being taken

Image 7: Photograph of land fenced off by National Grid – Too narrow for the herd
Viewed Stop 6 on recent ASI (Sion Hill Farm)

Image 8: Material showing the approximate 80m replacement-land access connection



Appendix D - Biosecurity Risks and Disease Transmission Pathways

PFL/TCS's biosecurity controls are based on decades of operating experience and continual monitoring of national and international disease incidence. Careful sourcing, quarantine, animal welfare management, traceability and environmental control have enabled us to maintain a stable donor animal system and avoid the kind of disease disruption that can compromise supply chains and has affected other animal based operations in the UK.

We have long recognised that emerging and transboundary animal diseases present a significant risk to operational continuity, product suitability and customer confidence. Historical events, including BSE, Foot and Mouth Disease, Swine Flu and the emergence of Bluetongue in the UK, have demonstrated how rapidly disease threats can disrupt the movement of animals and animal derived products. That can affect product availability, export capability and market acceptance even where no direct infection is identified on site. These events have shaped our approach to biosecurity, donor-animal management and supply-chain resilience.

At a more localised level, we must also manage disease, infection and contamination risks that may not trigger national controls or notifiable disease restrictions, but can still affect animal welfare, donor suitability, product quality and continuity of supply. Respiratory disease, skin disease, parasites, bacterial contamination, environmental organisms, moulds, feed quality issues, dust, water contamination and contaminated clothing, equipment or vehicles may all have operational consequences. For us, even a localised issue may require veterinary intervention, isolation, quarantine, exclusion of animals from donation, additional testing, batch investigation, product rejection or disruption to customer supply.

Maintaining a secure, closely monitored environment is essential to protecting animal health, safeguarding product integrity and ensuring continued confidence in donor animal blood products. Disease status and customer confidence matter: a disease or contamination issue can undermine product viability even where the physical holding remains intact.

This Appendix is illustrative, not exhaustive. Its purpose is to explain the categories of disease risk and transmission pathways that we must control. Those pathways may include animals, people, clothing, boots, vehicles, trailers, machinery, equipment, soil, dust, water, feed, insects, fencing, handling systems and airborne or droplet routes, depending on the disease. The table identifies, where relevant, potential zoonotic or wider public-health considerations and the associated impact on business continuity and product suitability.

Table D1: Illustrative Biosecurity Risks and Disease Transmission Pathways

Category	Equine examples	Ovine / sheep examples	Transmission pathways / vectors	Why this matters for PFL/TCS
Higher consequence, notifiable or movement related disease risks	Equine infectious anaemia; African horse sickness; equine viral arteritis; glanders; equine herpesvirus-1. Some horses may originally have come from outside the UK, so movement history, testing and quarantine are important controls.	Foot and mouth disease; bluetongue; scrapie. PFL's sheep are sourced within the UK, so the principal ovine focus is UK flock health, environmental, parasite and notifiable disease risk.	Animal movement, imported or introduced animals, insect vectors where relevant, vehicles, people, equipment and contaminated environments.	These examples illustrate why disease prevention is critical. Suspected high consequence or notifiable disease will require veterinary investigation, isolation, movement controls or other disease control consequences. Zoonotic or public-health relevance varies by disease; in all cases the risk is not simply illness in one animal but disruption to the wider businesses and supply chain.
Common but operationally disruptive respiratory and contact spread diseases	Equine influenza; strangles; equine herpesvirus; respiratory bacterial infections.	Pasteurellosis / pneumonia; infectious eye disease; other flock respiratory infections.	Direct animal contact, droplets or airborne routes for some respiratory diseases, and contaminated hands, clothing, boots, gates, buckets, trailers, equipment and handling areas.	These diseases can affect welfare, donor suitability, quarantine, staffing, veterinary intervention, animal movement and continuity of collection. They are directly relevant to controls over people, vehicles, equipment, gates, clothing and handling areas. An outbreak in this category would reduce our ability to supply product by affecting donor availability, quarantine, veterinary intervention and continuity of collection.
Skin, parasite and contact associated diseases	Ringworm; lice; mites; dermatophilosis / rain scald; wound-associated infections.	Sheep scab; lice; ticks; orf; footrot; contagious ovine digital dermatitis.	Close contact, handling systems, shared equipment, fencing, gates, clothing, boots, vehicles, bedding and contaminated surfaces.	Some examples, such as ringworm and orf, can have zoonotic relevance. Others are primarily animal welfare and flock/herd management concerns. These risks can require treatment, separation, altered handling, additional cleaning and veterinary management. A significant outbreak could require treatment, separation of affected animals and altered handling, reducing donor availability and disrupting planned collections.
Environmental, soil, dust, water and feed linked risks	Clostridial organisms, including tetanus risk; leptospirosis; salmonella; fungal spores and moulds; environmental bacterial contamination.	Clostridial disease; listeriosis; salmonella; coccidiosis; liver fluke; gastrointestinal worms; mould or feed-quality risks.	Soil disturbance, dust, water movement, drainage, feed areas, open clamps, bedding, coats, hooves, wounds, machinery and vehicle movements.	This category is particularly relevant to construction interfaces. Soil disturbance, dust, water movement, vehicle movement and external personnel can increase environmental loading or create pathways into grazing areas, feed areas, water points, coats, hooves, minor wounds and laboratory interfaces. Some examples also have zoonotic or occupational health relevance. A significant outbreak could remove groups of animals from the donor pool and disrupt collections until the issue is investigated, treated and controlled.
Disease transmission pathways / biosecurity vectors	Clothing, boots, hands, vehicles, trailers, gates, shared equipment, dust, water, feed, fencing, animal movement and airborne or droplet spread for some respiratory diseases.	Clothing, boots, vehicles, machinery, water, feed, bedding, soil, fencing, handling systems, parasites and animal movement.	People, vehicles, contractors, machinery, tools, shared surfaces, insects, soil, dust, water, feed and animal movement.	Our concern is not limited to visible mud or direct animal contact. The concern is the avoidable introduction of additional disease pathways into a controlled donor animal system. That is why new animals are tested and quarantined, vehicle and personnel movements are controlled, and construction interfaces near donor animal areas are materially different from ordinary farm traffic.

The hearings confirmed the inadequacy of the Applicant's approach to biosecurity. The Applicant accepted that PFL/TCS operates at a different biosecurity level from an ordinary agricultural business. The consequence of that acceptance should be a different design response, not reliance on generic "toolbox talks", later liaison and future management plans. The Applicant proposes to leave critical biosecurity controls to later plans but Buckinghamshire Council itself identified that it does not have internal expertise in the TCS Biosciences area. That reinforces our concern that these controls cannot safely be deferred to ordinary discharge of requirements. We also operate within a Home Office licensed framework, it is not clear how the Applicant and local planning authority can set the operating standard for biosecurity, or judge whether that standard has been met, where the existing business is regulated under a different and specialist licensing regime. The proper response is to avoid unnecessary construction and access issues with the holding at source. That is why access to Parcel 3 from East Claydon / Winslow Road, rather than via Granborough Road through the PFL/TCS holding, is a priority mitigation. It would not remove every biosecurity issue, but it would materially reduce the introduction of third party construction traffic, personnel, plant, soil and dust pathways into the operational donor animal system.

The Applicant has previously stated that it will comply with our biosecurity protocol (see Appendix E Section 1). The protocol provided to date is only relevant when personnel are being escorted on site as currently no personnel are permitted onto the holding without being escorted. In the case of the Applicant and its unescorted access to the site during the project, we would need a whole host of additional

mitigation measures to be adhered to. These will be provided in more detail at Deadline 4.

Appendix E: Biosecurity and mitigation measures:

Introduction

This Appendix is our initial, preliminary only and without prejudice, response to the following action points from ISH1-2:

37. For Deadline 3 if possible and if not Deadline 4 'to submit detail around [our] biosecurity measures and further concerns.'

44. For Deadline 3 if possible and if not Deadline 4, 'to provide (if preferable on a without prejudice basis) a response to the Applicant's proposed mitigations, and identification of any further mitigations [we] consider appropriate'

We stress at the outset that we intend to work up a full document for Deadline 4, but are providing this now in the hope it assists the examiners and the Applicant.

For now we have focused more on biosecurity measures, so combined action points 37 with a sub-set of items under action point 44. This document is not intended to be a full response to either action point, and certainly not to action point 44.

The Appendix is in two sections, which we introduce and explain here. The two sections are not to be confused.

The first section is the current visitor standard operating procedure (SOP) for Preston Farms.

This is for pre-arranged, escorted visits. This is the only access that we currently permit to the Holding.

The SOP was suitable for the accompanied site inspection (ASI), because that was a limited visit and with visitors remaining under our control and escorted at all times.

The SOP would not be suitable or sufficient for the Project itself, which will involve large scale construction access, cross-parcel movement, or potentially unescorted access: if such access is sought, additional controls would be required to replicate, so far as possible, the control we presently achieved by escorting under the SOP.

In our 60 years of operation (and multi-generational ownership / farm management), we have not had to deal with anything of this nature.

As such, and further to ISH1&2, by action point 37 and partly by action point 44, we have been asked to set out what would be needed by way of biosecurity measures over and above the generic SOP.

Given the short time frame between ISH1 & and Deadline 3, we have done what we can at section 2, but that should be considered as a work in progress, that is by no means exhaustive and is supplied on a without prejudice basis. We commit to submitting a complete version of this document at Deadline 4.

Section 1 – Preston Farms Visitor SOP (As issued for the ASI)Preston Farms/ TCS Biosciences

Site Inspection Biosecurity and Visitor Control

Department: Preston Farms/ Production Support

1. Purpose

The purpose of this Standard Operating Procedure (SOP) is to set out the biosecurity steps required for any site inspection or visit at Preston Farms, so that visits can be completed without compromising animal welfare, biosecurity or normal operations.

2. Scope

2.1 This SOP applies to all visitors attending Preston Farms, including inspections, audits, contractor work, customer visits, regulatory visits and management visits.

2.2 Preston Farms operates as part of a tightly managed horse and sheep business supporting biomedical production through TCS Biosciences.

2.3 All visits must be pre-arranged with Preston Farms and escorted. Visitors must comply with the controls in this SOP.

3. Responsibilities

3.1 Preston Farms Manager (or nominated deputy): to brief and escort visitors, set routes and apply additional controls where required.

3.2 Visit organiser/ host (TCS contact): to confirm attendance details in advance and issue pre-visit instructions.

3.3 Visitors: to comply with this SOP and follow Preston Farms staff instructions at all times.

4. Procedure

4.1 General principles

4.1.1 The holding is managed as a controlled system. Livestock are maintained within planned rotations and controlled areas.

4.1.2 Uncontrolled access between fields or livestock groups can disrupt rotation, increase disease risk and cause animal stress.

4.1.3 All visits must be escorted and must follow agreed routes.

4.1.4 Visitors must comply with any additional restrictions in place at the time of the visit (for example, disease restrictions or movement controls).

4.2 Before the visit (pre-arrival requirements)

4.2.1 Visitors must confirm attendance in advance (date/time, number of attendees, and vehicle details where applicable).

4.2.2 Visitors must declare in advance if they have recently been on other livestock premises, particularly where there are known restrictions or disease issues.

4.2.3 Visitors must arrive in clean footwear and suitable outdoor clothing.

4.2.4 Where required, visitors may be asked to bring a change of footwear and/or clothing.

4.3 Arrival on site

4.3.1 Visitors must report to the agreed meeting point.

4.3.2 Visitors must follow the briefing given by Preston Farms staff.

4.3.3 Visitors must remain with their escort at all times unless expressly authorised otherwise.

4.4 Movement around the site

4.4.1 Visitors must stay on agreed routes.

4.4.2 Visitors must not enter paddocks, barns, stables, yards, handling areas or livestock areas unless specifically invited and authorised by the escort.

4.4.3 Visitors must avoid contact with animals, gates, fencing, feed, bedding, water troughs and equipment where at all possible.

4.4.4 Visitors must keep a reasonable distance from livestock and avoid sudden movements and loud noise.

4.5 Footwear, hygiene and protective measures

4.5.1 Where directed, visitors must use the biosecurity measures provided, which may include disinfectant foot dips and disposable overshoes.

4.5.2 Visitors must not move from one livestock group or field to another without escort approval.

4.5.3 Disposable overshoes (where issued) must be fitted and removed as instructed and disposed of in the designated waste.

4.6 Vehicles and parking

4.6.1 Vehicles must park only in designated areas as instructed by Preston Farms staff.

4.6.2 Vehicles must not drive across fields unless agreed in advance and authorised on the day.

4.6.3 Vehicles & machinery should arrive clean, and disinfection will be required as directed by Preston Farms staff.

4.7 Photography and recording

4.7.1 Visitors must request permission before photographing or recording animals, handling areas or operational parts of the site.

4.7.2 Where permission is granted, visitors must follow any restrictions set by the escort.

4.8 Departing the site

4.8.1 Visitors must leave via the agreed route and return any issued PPE as instructed.

4.8.2 Visitors must report any incident, animal contact, or deviation from agreed routes to the escort immediately.

Section 2 – Expanded Project Specific Points for Consideration

As explained, the current visitor SOP (above) is based on pre-arranged, escorted visits as that is the only access that we currently permit to the Holding. It was suitable for the ASI because there was limited site inspection / visitor access and visitors remained under Preston Farms control and escorted at all time. It would not be a sufficient basis for large scale construction access, cross-parcel movement, or unescorted access, and if any such access is sought, additional controls would be required to replicate, so far as possible, the control achieved by escorting.

In line with the action points for us from ISH1, we have given consideration to a list of biosecurity measures over and above the generic procedure above, reflecting the fact that in our 60 years of operation (and multi-generational ownership / farm management), we have not had to plan for something of this nature.

We would like to stress again that given the short time frame between ISH1 & and Deadline 3, the below list should be considered as a work in progress, is by no means exhaustive and is supplied on a without prejudice basis. We commit to submitting a complete version of this document at Deadline 4.

Further project specific points for consideration include but are not limited to:

- Escorted-access baseline – As per SOP requirements Above.
- Enhanced controls for unescorted / repeated access
- PFL/TCS-specific induction and training for all Rosefield personnel wishing to access the site
- Named-person access only
- Pre-arranged, logged and authorised access with photo ID checks, visible passes and defined permitted areas.
- Controlled access point / gatehouse or security presence
- Access control records – signing in and out with date and time stamp
- Background screening, including basic DBS or equivalent contractor vetting etc
- No casual access from other Rosefield parcels into or across PFL/TCS land without approval and appropriate sanitisation measures / checks.
- Clean / dirty route separation
- Fixed agreed routes for E23.
- Vehicle, equipment, clothing and footwear controls
- Strictly no photography, filming, drones or mobile-phone recording on or overlooking PFL/TCS operational areas without prior written approval.
- Strict no-contact rules for animals and farm infrastructure
- Escort requirements for access within defined sensitive areas

- Works blackout periods, during:
    - Donor sessions
    - Animal movements
    - Veterinary activity
    - Silage / feed operations
    - Extreme weather
    - Disease-control periods
    - Any period identified by PFL/TCS or the Named Veterinary Surgeon as sensitive.

- PFL/TCS-specific noise, vibration, lighting, glare, dust and biosecurity controls, including:
    - Baseline monitoring at relevant receptor locations, trigger/action levels
    - Behavioural-response triggers.
- Immediate stop / review / modify powers where PFL/TCS, the Named Veterinary Surgeon or an independent compliance officer reasonably considers that works may compromise:
    - animal welfare
    - donor suitability
    - biosecurity
    - access safety
    - product quality continuity

- Independent PFL/TCS protection / compliance officer.
- Incident and product-impact protocol, covering:
    - Startle events
    - Abnormal animal behaviour
    - Injury
    - Escape
    - Veterinary intervention
    - Donor-session cancellation
    - Deterioration in product quality
    - Additional testing
    - Contamination concerns
    - Business interruption.

The above list is a draft, supplied without prejudice. This list to be refined and completed with more detailed information for deadline 4.

In addition to the above:

- Applicant funding of PFL/TCS compliance burden required to administer any access, monitoring, biosecurity or incident-response regime including, but not limited to:
    - Reasonable staff time
    - Veterinary time
    - Compliance time
    - Training time
    - Professional costs

    - Infrastructure costs

The Applicant must also:

- Indemnity and compensation mechanisms for losses arising from the project, including but not limited to:
    - Animal injury
    - Medication
    - Donor-session cancellation
    - Product failure / rejection
    - Additional testing
    - Replacement feed
    - Additional labour
    - Veterinary costs
    - Biosecurity incidents
    - Business interruption (Preston Farms and TCS Biosciences)
    - Customer / End user related compensation (TCS Biosciences)
    - Pentalties due to failure to meet contractual supply obligations (TCS Biosciences)
    - Any incoming / outgoing supply-chain disruption caused by the works

Preston Farms and TCS Biosciences Ltd must be consulted and will have the final approval for any method statement or management plan affecting their land, animals, donor operations, access, feed, biosecurity or product-transfer routes.

In the event that approval is not granted, an arbitration mechanism will be agreed to resolve issues before works commence. All costs associated with arbitration will be borne by the Applicant.

The above measures are not Preston Farms / TCS Biosciences preferred mitigation. They illustrate the level of control that would be required if the Applicant insists on retaining a layout and access strategy that introduces construction activity into the Preston Farms / TCS Biosciences operating environment.

If the Applicant considers such controls as disproportionate or impractical, that confirms Preston Farms / TCS Biosciences primary case in that the correct mitigation is avoidance, particularly removal of E23 from solar/construction use and avoidance of Granborough Road access.

Appendix F - Proposed alternative route to access Parcel C

Preston Farms and TCS Biosciences Ltd strongly object to the proposed access to Parcel 3 via Granborough Road. Access via Granborough Road (which road is crucial for our product and feed movements, and generally) and the associated routing within our Holding would disrupt farm operations, create livestock management difficulties, increase animal stress and introduce huge biosecurity risks.

Our primary concern regarding access to Parcel 3 via Granborough Road is that of biosecurity and disruption the site itself. We have made clear that access to Parcel 3 via Winslow road would be the route of least disruption to the holding, and presents a more manageable (not eliminated) biosecurity risk. Our secondary concern is that we are likely the primary user of Granborough Road for access to the Silage clamp, throughout food making periods and for feeding the animals when the clamp is open. As explained during the ASI, in 2025 the Silage Clamp was in regular use for 11 months of the year, owing to early feeding in June due to the dry summer conditions. We also use Granborough road for large farm machinery movements, and for regular blood collection from bleed sites.

A more suitable access strategy would utilise East Claydon / Winslow Road to reach Parcel 3, removing the need for construction traffic to cross sensitive farmland via Granborough Road. While no route entirely eliminates our biosecurity concerns, this option would remove traffic movements across sensitive operational farmland and minimise impacts on the farming business.

Our mapped route is provided because the Applicant's answer at ISH1 did not demonstrate that the Granborough Road / Parcel 3 construction route is necessary. Under our proposed route, construction traffic travelling from the A34 and M40 Junction 9, Wendlebury Interchange, would use the A4421 and A421 to connect with the proposed Abnormal Indivisible Loads route along the A413 from Buckingham. The A4421 is an appropriate strategic route, already proven for major infrastructure traffic, including HS2 operations. The A421 between Buckingham and Winslow is also the principal route linking Buckingham and Aylesbury, making it an appropriate corridor for construction traffic.

An alternative route exists via M40 Junction 10 and the A43/A421 corridor, although this would involve a longer journey and is therefore considered likely less favourable.

Under our proposal, traffic would leave the A34/M40 network as planned, route east and north of Bicester via Newton Purcell, continue along the A421 through Finmere and Tingewick, and proceed to Buckingham to join the AIL route. This route is approximately 24.2 miles according to Google Maps.

See yellow route marked in Figure 1 herewith.

By comparison, the applicant's proposed route via Station Road/Dewes Way, Snake Lane/Fidlers Field, Claydon Road, and Granborough Road is approximately 19 miles (Google Maps). However, the additional five miles is justified as our proposed route keeps HGV traffic on strategic A roads for the majority of the journey and avoids routing construction traffic through the PFL/TCS holding.

The Applicant's response at ISH1 was that its primary reason for using Granborough Road was construction efficiency/convenience: Mr Buchan's evidence was that the Applicant had undertaken a detailed review of construction route options and considered its chosen route to be the "optimum solution", primarily, he said, due to reasons of construction efficiency. Once again, this is a clear example of the Applicant's lack of engagement with our concerns and its failure to apply relevant principles, including the mitigation hierarchy. Notably, the Applicant mounted no substantiated objection to our proposal on traffic grounds, Mr Buchan simply said (vaguely, with no supporting assessment pointed to), that our proposed route would go through 'urban areas': Buckingham, Padbury and Winslow. However, the route through Buckingham, Padbury and Winslow is principally on the A421 and A413, which are main A-roads and already form part of the strategic local highway network. The only materially different issue is the point at which traffic would turn off in or near Winslow to reach East Claydon / Winslow Road.

The Applicant also referred to vegetation and road changes that would be required for our East Claydon / Winslow Road route. However, the Applicant acknowledges that its preferred Granborough Road route will require vegetation clearance and significant road alterations. The Applicant has not explained why works on one route are unacceptable while comparable works on its preferred route are acceptable.

The Applicant's unsubstantiated response to our proposed route at ISH1 invites the real question: whether the Applicant has undertaken a proper comparison between the two options, including the impact on PFL/TCS, in line with e.g. the mitigation hierarchy.

This was not a new point raised for the first time at ISH1. We had already identified access from Winslow Road / the north as an available alternative and received acknowledgment, at least as early as October 2024, and as recorded in Appendix B. While we had not previously provided this level of detail about the exact suggested route, we did not understand that to be required at the consultation stage. We would therefore expect to see assessment of this option in the Applicant's route review work from that period.

We therefore request that the Applicant provide the part of its "detailed review" which assessed the route identified by Gareth Williams, including the reasons for rejecting it and any comparison with the Granborough Road / Parcel 3 route. We would also welcome detail of what impact on PFL/TCS was assessed as part of this detailed review. If no PFL/TCS specific comparison was undertaken, the Applicant should say so.

PFL/TCS also seek clarification of Mr Buchan's comment that other schemes use our suggested route simply because they are located to the north of that road and have no other route choice. We do not understand that comment. Both the Statera scheme and the proposed new National Grid substation are to the south of the Winslow Road.

The Statera appeal decision letter of 11 September 2025 (ref APP/J0405/W/25/3360815, a decision of Planning Inspector B Plenty BSc (Hons) DipTP MRTPI) reinforces the case for our proposed route, and the need for a proper explanation if the Applicant is to justify rejecting it. We do not suggest that the Statera decision is determinative of the access strategy for Rosefield, but given the Inspector gave careful consideration to traffic routing it is a material consideration, and we consider persuasive. The Inspector's decision letter records that construction access for the Statera scheme was intended to take place mostly from East Claydon Road via a temporary haul route, with Hogshaw Road (the Granborough Road) used for AIL movements and when the haul route was impassable. The Inspector described the haul route as providing a "safe and convenient route from the highway network into the site" and recorded that construction vehicles were to approach by an agreed route via the A421 and A413. The contrast with the Granborough Road/Hogshaw Road is clear from the Inspector's words about it, at paragraphs 65 and 66: "65…Hogshaw Road is a narrow country road where vehicles can pass at slow speeds, with no footways or streetlights, nonetheless it has a 60mph speed restriction. 66. The haul route would provide a safe and convenient route from the highway network into the site, avoiding Hogshaw Road…".

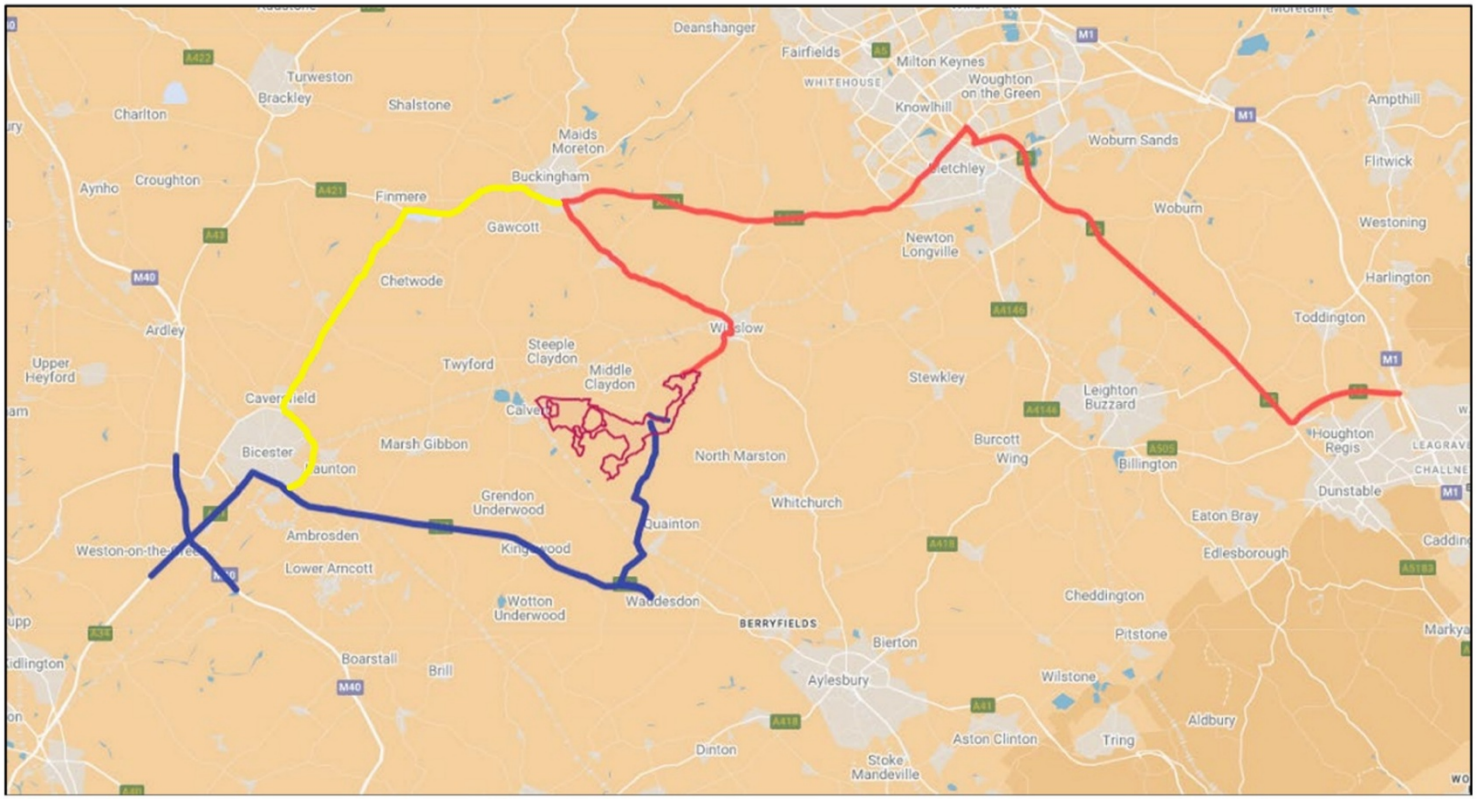
The decision shows that a broadly comparable access concept in this area has previously been treated as capable of being made acceptable through assessment and CTMP controls.

At present, the Applicant's case appears to be that Granborough Road / Parcel 3 is preferred because it is convenient for construction delivery. That is not the same as demonstrating that it is necessary, proportionate or the minimum interference option for PFL/TCS, especially when a clear alternative route is available.

Figure 1

Proposed Access Strategy

With addition of Preston Farms / TCS Biosciences Access Plan for Parcel 3



Blue Line	Access to from A41 from Station Road, Dewes Way, Snake Lane, Fiddlers Field and Claydon Road
Red Line	Abnormal Indivisible Loads (AIL) will approach the Site from the A41, located to the south of the Order Limits.
Yellow Line	Preston Farms / TCS suggested access to Parcel 3, using the A4421 and A421 joining the AIL route in Buckingham

Protecting the Lifeblood of UK Diagnostic Microbiology

A call to action regarding the availability of critical diagnostic media

Founder and Chief Medical Officer
[redacted]

CEO
[redacted]

13th May 2026

To Whom It May Concern,

I write in my capacities as a Consultant in Intensive Care Medicine at University Hospitals Birmingham NHS Foundation Trust, co-founder of the Infection Management Coalition and Founder and Chief Medical Officer of the UK Sepsis Trust.

I am also Vice-President of the Global Sepsis Alliance and a member of the WHO Sepsis Technical Expert Group.

Sepsis – a life-threatening condition in which a dysregulated host response to infection causes organ damage – is estimated to claim between 11 and 20 million lives annually worldwide with 48,000 lives lost each year in the UK. The key intervention in Sepsis other. than supportive therapy for failing organs in Intensive Care is control of the source of infection, achieved in some cases through surgery or interventional radiology but in every case through the administration urgently of appropriate antimicrobials, typically antibiotics. Sepsis is therefore intrinsically intertwined with antimicrobial resistance (AMR). Sepsis is a time critical medical emergency, with even one hour of delay of administration of an appropriate antimicrobial presenting a slimmer chance of survival.

For an individual patient, the ability to select the most appropriate antibiotic with the narrowest appropriate spectrum of activity can be life-saving. For a population, inability to do this will inevitably accelerate the existential crisis of AMR.

Whilst the science and technology of diagnostics in this space has accelerated rapidly in recent years, with more rapid molecular diagnostics promising a future in which clinicians can make informed choices within a small number of hours, the reality is that these are extremely poorly integrated into clinical systems and currently have significant inadequacies when compared with the gold standard, which is the culture of blood on animal blood-enriched agar plates. Even if they were to be able to identify a sufficient range of pathogens in the near future, they will not be able to deliver sufficient information on the susceptibility of specific pathogens to antimicrobials (Antimicrobial Susceptibility Testing). This is a vital component of appropriate antimicrobial stewardship, particularly in a world where different populations within the same city can be affected with pathogens with a two-fold difference in sensitivity to antibiotics according to such crude indices as socioeconomic status.

This is why blood cultures remain the cornerstone of pathogen identification and AST and will do for many years to come. It is why the UK continues to rely on blood enriched agar plates for blood cultures with more than 60 million used annually. It is why international guidelines on sepsis from the Surviving Sepsis Campaign and national guidelines from agencies such as the National Institute for Health and Care Excellence (NICE) recommend that for patients with suspected sepsis at least two sets of blood cultures be sent to the laboratory within the first hour following presentation.

We at the UK Sepsis Trust are alarmed at the potential for decisions which might impact on the supply chain for these vital diagnostics. To allow the supply chain to become interrupted will not only mean that patients with sepsis failed to receive appropriate antimicrobials in a timely fashion, which will undoubtedly cost lives, it will also mean that we as a country fail to play our part in delivering robust antimicrobial stewardship – in fact, it will directly contribute to the rising threat of antimicrobial resistance.

Yours sincerely,

[redacted]

[redacted]
Founder and Chief Medical Officer: UK Sepsis Trust
Vice-President: Global Sepsis Alliance

15/05/2026

To whom it may concern,

Antimicrobial resistance (AMR) occurs when infections no longer respond to the medicines available to treat them. AMR contributes to over 35,000 deaths in the UK every year.

When a patient is not responding to, for example, antibiotics, laboratory testing can determine which (if any) antibiotics might be effective, and can enable the clinical decision to be taken to admit the patent to hospital for “last chance” administration of antibiotics that are not available outside of hospital settings.

The data about resistant infections generated in our laboratories is also used for AMR surveillance, identifying outbreaks of disease and informing public health responses.

Within laboratories, most testing is still carried out using animal blood containing agar plates, with 60 million of these used annually in the UK.

The underlying assumption of the continued availability of these blood-containing agar plates is a continuous supply of high-quality animal blood. Suppliers in the UK are subject to very stringent requirements, and at the moment there are only 2 suppliers in the UK, making this a very fragile supply chain, where any sudden disruption to supply could be potentially catastrophic in terms of:

- Delayed or missed diagnosis of serious infections
- Inappropriate antibiotic prescribing
- Higher hospital admissions within an already stretched NHS
- A reduced ability to monitor and respond to emerging threats to population health

In the medium/longer term, methods of diagnostic testing may further develop and the need for continued use of blood-containing AMR plates diminish. However, in the short-term, as the UK patient organisation for antimicrobial resistance (AMR), we urge all stakeholders to secure the supply chain that currently underpins patient safety in the UK, preventing deaths and long-term damage to health.

With best wishes,

[redacted]

[redacted]

CEO

AMR Action UK

www.amr-action-uk.org