

Rosefield Solar Farm

Applicant's Response to the Examining Authority's Second Written Questions

EN010158/APP/8.23
Revision 01
Deadline 4
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Rosefield Energyfarm Limited



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1. Introduction

1.1. Purpose of the Report

- 1.1.1. This report provides the Applicant's responses to the Examining Authority's second written questions (ExQ2) [\[PD-016\]](#) issued on 5 June 2026 in respect of the proposed Rosefield Solar Farm (the Proposed Development).

1.2. Structure

- 1.2.1. Section 1 of this report sets out the purpose and structure of this report and explains the approach taken by the Applicant in preparing responses.
- 1.2.2. Section 2 of this report provides the Applicant's responses to the questions raised of the Applicant by the Examining Authority (ExA), including signposting to other responses and documents where appropriate. Where questions have been raised of other parties, the Applicant has not provided a response to those questions except where it considers that it would be helpful for the ExA for it to do so.

1.3. Approach

- 1.3.1. To minimise duplication, the Applicant has sought to cross-refer where appropriate to responses provided in other DCO Application documents, or other relevant submissions that have been entered into the Examination.

2. Responses to First Written Questions (ExQ2)

Table 2-1.1: General and Cross-topic

ExQ2 Ref	Question	Applicant's Response
Q2.1.2	National Policy Statement (NPS) EN-3 - glint and glare NPS EN-3 paragraph 2.10.136 states that applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence as part of a mitigation strategy. Has the applicant considered such methods to mitigate glint and glare effects? If so, signpost to where and how it has done so. If not, why not?	Adjusting the tilt and/or azimuth angles is a valid method of mitigation for Glint and Glare effects, but it usually has adverse implications on the energy output from the solar PV modules, as the orientation deviates from the optimum. Where possible, other forms of mitigation (i.e. anti-reflective coating or vegetation screening) is considered first. Adjusting orientation angles is usually reserved for aviation receptors, or for ground-based receptors (i.e. roads, railway lines or dwellings) where other mitigation is not effective. ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082] Section 9 shows no significant adverse effects either on aviation receptors or on ground-based receptors with the proposed embedded mitigation in Section 5.2. Therefore, further mitigation in the form of adjusted orientation angles was deemed not necessary.

Table 2-2.1 Need, site selection and alternatives

ExQ2 Ref	Question	Applicant's Response
Q2.2.1	Overplanting The applicant's response to action point 2 of issue specific hearing 1 (ISH1) [REP3-049] estimates that with a linear increase in panel efficiency of 13%, the increase in panel output would increase the current anticipated installed capacity of 334.1 megawatts (MW) to 377.8MW without any increase in number, size or location of panels installed. If the battery energy storage system (BESS) was not implemented by the applicant, and fields D8 and D9 were instead developed with solar photovoltaic (pv) arrays, what would the additional installed capacity be on top of any increase due to panel efficiency?	Should Fields D8 and D9 be developed with solar photovoltaic (PV) arrays instead of the BESS then this would provide approximately an additional 10MWp from the additional Solar PV modules that could be installed across the area. A detailed assessment would be required to confirm the estimates should the BESS area change use and house Solar PV modules instead.
Q2.2.2	National Policy Statement (NPS) EN-1 (2025) At ISH1, the applicant [REP3-049] drew attention to paragraph 4.11.12 of NPS EN-1 (2025) which states that "The Secretary of State should be satisfied that appropriate network connection arrangements are/ will be in place for a given project regardless of whether one or multiple (linked) applications are submitted." The applicant considers that this has been met in relation to both the solar and BESS as it currently benefits from a grid connection agreement for both the solar and BESS elements, albeit subject to	The Applicant notes that the Written Summary of Applicant's Oral Submissions at ISH1 [EN010158/APP/8.16] [REP3-049] refers to policy referring to a "realistic prospect", which is an error as both the 2023 and 2026 versions of NPS EN-1 refer to "no obvious reason" in paragraph 4.11.6. It is the case of <i>St Modwen Developments Ltd v Secretary of State for Communities and Local Government and other [2017] EWCA Civ 1643</i> which considered deliverability was concerned with a "realistic prospect" of delivery. In any case, the Applicant considers there is no obvious reason why a Gate 2 network connection would not be possible for the BESS, and also a realistic prospect of delivery of a Gate 2 network connection. The Applicant refers to its responses in the Written Summary of Applicant's Oral Submissions at ISH1 [EN010158/APP/8.16] [REP3-049], and Action Point 5, which set out the existing and proposed connection arrangements for the solar PV and the BESS elements of the Proposed Development. As set out on page 11 of that

ongoing industry-wide reform. The applicant also considers that the “relevant test is whether there is a realistic prospect of a grid connection, rather than certainty.”

To the applicant:

1. Provide further justification for your position that the “relevant test is whether there is a realistic prospect of a grid connection, rather than certainty.”

To Buckinghamshire Council:

2. Does the Council agree with the applicant's interpretation of paragraph 4.11.12 of NPS EN-1 (2025) that the test is one of demonstrating that there is a realistic prospect of a grid connection?

document, “*The Applicant's position is that the Government's current policy position confirms that the need, which is established by the National Policy Statements, for renewable and flexible energy infrastructure, continues to apply to any scheme or component of a scheme which currently has a Gate 1 connection agreement.*” The Applicant is able to reapply for Gate 2 status for the BESS in a future application round and there is no obvious reason why a network connection would not be secured through re-application particularly as the grant of the DCO (if made) would further demonstrate “readiness”. The Applicant also refers to its further response to Action Point 5 provided in the **Applicant's Outstanding Responses to Actions from ISH1 and ISH2 [EN010158/APP/8.24]** submitted at Deadline 4.

The Applicant's **Grid Connection Statement [EN010158/APP/7.1] [APP-137]** confirms that a grid connection agreement for both the solar and BESS components of the Proposed Development is in place. The Applicant is expecting NESO to propose variations to that agreement as part of its Connections Reform process.

NESO have provided some clarity on the Connections Reform process outcomes in relation to Gate 1 projects which can be found at: <https://www.neso.energy/industry-information/connections-reform/gate-1-information>. The guidance explains that Gate 1 agreements will remain in place until the scheme is resubmitted to a future connections application window and meets the criteria for Gate 2, or the developer terminates the project.

In Planning for New Energy Infrastructure (the government's consultation response to the new NPSs) available at: <https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf>, the government explains that “Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals”.

The government has therefore committed to “ensur[ing] that language used across government publications does not inadvertently constrain ambitious deployment of clean energy technologies” for example through the application of the Clean Power 2030 capacity ranges to the re-prioritisation of projects as part of Connections Reform.

It is the Applicant's view, which is consistent with the attributes of projects which can contribute to the Clean Power 2030 milestone, that this explanation applies to projects of all scales which require consent across all of the planning landscape, i.e. Nationally Significant Infrastructure Project's (NSIPs) and Town and Country Planning Act (TCPA) - consented schemes.

Therefore, and within the context of the new connections process, the Applicant maintains that its connection agreement is currently appropriate and also expects it to remain appropriate for both the solar and the BESS.

If the connection agreement for any future reason was no longer appropriate, the relevant component of the Proposed Development would not have an agreement to connect to the grid and therefore would not progress.

Q2.2.4

East Claydon BESS

At ISH1, the applicant confirmed [\[REP3-049\]](#) that it was in discussion with the developer of the proposed East Claydon BESS regarding the potential coordination with the abnormal indivisible load (AIL) access route, identified as Work No. 2B within the application, that may lead to a shared access and reduced land take.

1. If possible, provide drawings of how the shared access arrangement may result in a reduced land take.

The proposed location of the Proposed Development's abnormal indivisible load (AIL) access route has been designed to broadly align with the temporary construction track route for the proposed East Claydon BESS. This is to enable coordination with the developer of East Claydon BESS prior to construction and avoid the need for both projects to construct and potentially remove separate access tracks. Preliminary discussions have taken place with the East Claydon BESS developer regarding the potential for shared access, with formal agreement to be sought following DCO consent once the construction programmes for both projects are known. The **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.5]** sets out a commitment for the Applicant to consult with other developments including East Claydon BESS at the discharge of requirements phase to manage interactions and reduce any associated potential cumulative impacts.

The AIL route as proposed is considered to be efficient in terms of land take compared with a scenario in which the Applicant proposes a different AIL corridor alignment nearby or parallel to the East Claydon BESS temporary

2. Has the applicant discussed the potential for the proposed development to connect to the East Claydon BESS to utilise its storage capacity and proposed substation to further reduce land take? If not, why not?

construction track route, resulting in separate access being constructed for each project. As this alternative scenario has not been proposed, a drawing is not available for submission.

Regarding the potential shared use of the East Claydon BESS and its substation, the Applicant considers that the current policy position is that the need established by NPS EN-1 applies to all schemes or components of a scheme which currently have a Gate 1 connection agreement, whether or not they are within the scope of NPS EN-1. The Applicant has provided its reasoning at Action Point 5 of its **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**

Further, the Applicant notes that relevant government policy is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use (NPS EN-3 (2023) Para 2.10.10).

The Proposed Development including both solar generation and flexible storage is aligned with relevant government policy. Further, the Applicant is able to bring forward, under its own control, a solar scheme with associated flexibility. By doing so, the Applicant is able to ensure that the storage component supports the operation of the main solar component of the Proposed Development through reducing wasted output, providing flexibility, maximising use of the grid connection, improving security of supply and reducing carbon emissions from electricity generation.

East Claydon BESS has been consented independently of the Proposed Development and is being brought forward by a separate entity and is therefore not controlled by the Applicant. While the Applicant is not aware of obvious reason why East Claydon BESS would not come forward to fruition, the Applicant is not able to rely on delivery of this project to provide BESS capacity for its own scheme.

As with all energy market developments, there are a large number of steps required to take a scheme from consented to operational. Project attrition can occur at any stage. To mitigate the risk of relying on a different project which is not yet delivered, the Applicant is therefore proposing the Proposed Development over which it has total control.

The potential for the Proposed Development to connect to the East Claydon BESS to utilise its storage capacity is not appropriate for the following reasons:

- Each BESS facility has a separate connection agreement and should be considered as separate projects.
- The Proposed Development's BESS is ancillary to the solar PV development and would therefore require additional supporting infrastructure at the East Claydon BESS project to enable the East Claydon BESS to store energy generated by solar PV at the Proposed Development.
- There is a high rate of attrition amongst renewables projects and the Applicant cannot rely on the delivery of a separate project over which it has no control.

The shared use of the East Claydon BESS substation has been discounted for the same reasons listed above. In addition, a separate substation for the solar PV element of the Proposed Development would be required, which is not likely to be feasible to share with East Claydon BESS given the different technical requirements. Shared use of the East Claydon BESS substation would require a significant amount of additional cabling across Claydon Brook and a much larger substation with additional transformers at the East Claydon BESS site. It would not be likely to reduce the overall land or materials used for both projects and could even result in increased land take and materials used.

Q2.2.5

Site selection – topography

NPS EN-3 paragraph 2.10.19 identifies irradiance as a consideration in site selection which is in turn affected by topography “with an uncovered or exposed site of good

The Applicant refers the ExA to **ES Volume 3, Figure 2.3: Topography Plan [EN010158/APP/6.3] [AS-020]** which evidences the Applicant's statement in the **Planning Statement [EN010158/APP/5.7.5]**. In drawing the south facing assessment conclusion out, Fields B3, B4, B6, B7, B8, B18 and B19 (and parts of B9 and B10) in Parcel 1; Fields

elevation and favourable south-facing aspect more likely to increase year-round irradiance levels.” In addressing the policy requirement in the Planning Statement [\[REP1-016\]](#), the applicant states that “the general topography of the area surrounding the National Grid East Claydon Substation is land gently undulating, with much of the land sloping north to south, making it generally suitable for solar...”. Provide further information in support of this policy including details of the extent to which fields surrounding the substation are uncovered or exposed, of good elevation and with a south-facing aspect.

D4, D7, D10, D11, D13, D15, D28 and D29 (and parts of D17) in Parcel 2 and Fields E11, E20, E21, E22 and E23 benefit from southern oriented gradients.

In the context of NPS EN-3 paragraph 2.10.19, uncovered or exposed is assumed to refer to land that is open farmland rather than woodland. Main woodland areas were excluded from the Order Limits at the outset of the design process for the Proposed Development, as shown in the Site Context section of the **Design Approach Document EN010158/APP/5.8.3** [\[CR1-014\]](#), with the proposed buffers from woodland and hedgerows, as secured in the **Design Commitments [EN010158/APP/5.9.6]**, ensuring that the Proposed Development is only located in fields that are uncovered or exposed.

As shown by **ES Volume 3, Figure 2.3: Topography Plan [EN010158/APP/6.3]** [\[AS-020\]](#), the topography across the Site varies, being flatter and lower lying close to the National Grid East Claydon Substation in Parcel 3 and more undulating across other Parcels. However, as explained in the **Applicant's Response to Written Representations [EN010158/APP/8.12]** [\[REP2-086\]](#) at Ref. 1.1.20, there is flexibility within the fixed parameters to make adjustments at the detailed design stage to account for the topography e.g. the spacing between the rows of the solar PV panels to account for the angle of the sun and inter row shading. This flexibility is part of the optimisation of the Site and contributes to the best use of land available.

Q2.2.6

Site selection

With specific reference to Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, set out where the applicant has described the location, size and scale of reasonable alternative sites considered.

Schedule 4 of the EIA Regulations (2017) requires a ‘description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale)’ be included within Environmental Statements. This is provided within **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1]** [\[APP-047\]](#). In particular, the Applicant sets out the alternative locations considered (i.e. the 10km search area) in Section 4.4: Alternative sites’, while the size and scale of the development alternatives are set out across Section 4.4: Alternative sites and Section 4.7: Alternative layouts and design evolution.

Q2.2.7

Site selection – alternatives

Provide further explanation for the drawing of the “site boundary” identified in the Wintering Bird Survey Report undertaken in 2022 [\[APP-089\]](#).

The Applicant has previously responded to this point at Pages 18 – 20 of the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16]** [\[REP3-049\]](#).

The “site boundary” referred to in the **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4]** [\[APP-089\]](#) does not represent a Proposed Development boundary or final Order Limits. It reflects the extent of the survey area defined at an early stage of project development for ecological assessment purposes.

It is standard practice, particularly for Nationally Significant Infrastructure Projects (NSIPs) such as large-scale solar developments, to undertake environmental surveys over an initial study area to inform the design development. This allows developers to understand baseline environmental conditions and constraints, such as the presence and behaviour of wintering birds before refining the design of the Proposed Development. The survey area in 2022 therefore informed early-stage land assembly and environmental considerations, rather than delineating a fixed development boundary.

The **Design Approach Document EN010158/APP/5.8.3** [\[CR1-014\]](#) illustrates this process of design evolution. The area surveyed for wintering birds formed part of a wider initial search area used to identify potential options. Subsequently, a more defined and typically broader boundary was presented at non-statutory consultation as illustrated in **ES Volume 3, Figure 4.1: Stage 1 Zonal Masterplan [EN010158/APP/6.3]** [\[APP-064\]](#). This boundary was then further refined through ongoing environmental assessment, including the scoping process, the Preliminary Environmental Information Report (PEIR) as illustrated in **ES Volume 3, Figure 4.2: Stage 2 Zonal Masterplan [EN010158/APP/6.3]** [\[APP-064\]](#), and ultimately the Development Consent Order (DCO) Application.

Further detail on this iterative process is set out in the **Consultation Report [EN010158/APP/5.1]** [\[APP-020\]](#) and the **Site Selection Report** (Appendix 1 to the **Planning Statement [EN010158/APP/5.7.5]**). These documents

demonstrate how environmental and planning considerations have continually informed the evolution of the Proposed Development from early survey work to the current design.

In summary, the key point is that the “site boundary” shown in the Wintering Bird Survey Report is an initial survey extent used to gather environmental data and guide early design decisions. It should not be interpreted as a proposed or fixed development boundary, which has instead been subject to ongoing refinement through the project’s design and assessment process.

Table 2-3.1: Air Quality

ExQ2 Ref	Question	Applicant's Response
Q2.3.2	Aerosol particulates In ISH1 Claydons Solar Action Group (CSAG) in the discussion on the BESS Plume Assessment raised concerns with respect to the contaminants and pollutants carried in the air in a “runaway event” and their potential effects on human and animal health. CSAG’s written summary of their oral submission at the hearing [REP3-066] includes references to academic research on the topic of aerosol particulates emitted by lithium-ion battery fires and their distribution. How has the applicant addressed the issues raised by the action group in its assessment?	An assessment of the primary contaminants and pollutants on human health has been undertaken as part of the BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042]. The assessment was completed with reference to current best practice guidance published by Defra, the UK Health Security Agency, and US Environmental Protection Agency, with comparison against the UK air quality standards and acute exposure guideline levels (AEGs). This included an assessment of impacts from emissions of both coarse particulate matter (PM₁₀) and fine particulates (PM_{2.5}). The assessment concludes that a significant impact beyond the BESS site is unlikely. It has been demonstrated that under day-to-day operation there is a low risk of an incident, and in the event of an incident the credible hazards are understood and have been evaluated at this stage to demonstrate that the risk to the local population health remains very low. Furthermore, an assessment, as far as it is practical to do so given the unique sensitivities of the animals of concern, has been undertaken and detailed in the Applicants Response to Action Point 45 from ISH1 [EN010158/APP/8.26], which has been submitted at Deadline 4. As dispersion modelling has been undertaken to assess the impacts of the pollutants from a thermal runaway event, the predicted impacts are based on the prevailing wind direction and distance from the BESS units. Points 66 and 67 within CSAG’s written summary of their oral submission [REP3-066] relates to aerosols and particulates, which again have been assessed. As stated by CSAG, there is the potential for smaller particles to be emitted; however, as there is currently no UK regulatory standard to assess any modelled emissions, other than against PM₁₀ or PM_{2.5}, and very limited worldwide guidance on other size fractions, this has not been assessed within the main modelling assessment. However, this has been addressed further in the Applicants Response to Action Point 45 from ISH1 [EN010158/APP/8.26] at Deadline 4, with the residual risks of health effects as a result of a BESS fire concluded to be low.

Table 2-4.1: Associated Development

ExQ2 Ref	Question	Applicant's Response
Q2.4.1	BESS Capacity At issue specific hearing 1 [REP3-049], the applicant confirmed that the current indicative design for the BESS is approximately 1,000 megawatt hours (MWh) of storage capacity, equating to around 3 hours of storage at the	Publicly available information for operational NSIP sites around BESS and solar capacity include: - Cleve Hill Solar Park with 373 MW solar generating capacity and 700MWh of BESS storage capacity. Other NSIP solar farms have not yet declared BESS capacity and solar generating capacity as this would change based on the technology installed on-site. It is not until detailed design when these decisions would be made to determine the MWh capacity that would be generated from BESS in relation to the solar generation capacity.

proposed 335 megawatt (MW) connection capacity for the solar development.

1. Provide comparable details of BESS capacity in relation to solar generating capacity for other consented nationally significant infrastructure projects.
2. In the context of the above, provide further commentary on how the BESS would meet the definition of associated development in the Planning Act 2008 and in accordance with guidance on associated development applications for major infrastructure projects April 2013, including whether the BESS would be subordinate.

The Applicant considers that the BESS satisfies the definition of associated development, as set out in section 115 of the Planning Act 2008, as it is development that is associated with the construction of a solar farm exceeding 50MW of energy generation ("Principal Development") which requires development consent, does not include the construction of any dwellings and is within England.

In accordance with the '*Planning Act 2008: Guidance on associated development applications for major infrastructure projects*' (Department for Communities and Local Government, April 2013), the BESS development would be subordinate to the Principal Development as it is required to control the transfer of energy to the national grid due to the fluctuating quantities of energy generated by solar PV panels and is not the aim of the Proposed Development in itself.

The BESS also satisfies the other principles of associated development set out in the guidance as it: has a direct relationship to the Principal Development; is not only necessary as a source of additional revenue; is proportionate to the nature and scale of the Principal Development; and is typical associated development commonly brought forward with solar farm developments of this scale.

For these reasons, the Applicant considers that the BESS satisfies both the definition of associated development in the Planning Act 2008 and is in accordance with the guidance.

Table 2-5.1: Biodiversity and Ecology

ExQ2 Ref	Question	Applicant's Response
Q2.5.3	Proposed Bernwood Site of Special Scientific Interest (SSSI) – Ecological Impact Assessment (EclA) Explain what account you have taken of the proposed Bernwood SSSI and associated surveys and research reports in conducting the EclA in general and in particular with reference to Bechstein's bats.	The Applicant has used all available information to inform the assessment of the proposed Bernwood SSSI. The Applicant's approach to taking account of the proposed Bernwood SSSI is set out in paragraph 7.5.9 of the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] and comprised assessing each of the proposed interest features individually. Natural England have agreed the approach to assessment within their Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] Table 2 Ref 1.1. The baseline information used to support the assessment included site survey work carried out by the Applicant outlined in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] as well as Natural England's Commissioned Report 558 "The Bernwood population of Bechstein's Bats" that was collated to support the SSSI extension and synthesised data collected for High Speed 2 (HS2) from 2011. The Applicant also had sight of the latest available HS2 Bernwood annual bat monitoring reports which are not in the public domain but are shared with Natural England (including those from 2024), and the broader findings of which are shared with a wider group of stakeholders including Buckinghamshire Council and BBOWT.
Q2.5.4	Bechstein's Bat – potential loss of foraging habitat In its deadline 3 submission [REP3-061] at paragraphs 1.9 to 1.19 NE outlines its reasons for advocating that an avoidance approach is adopted with regard to the foraging habitat of Bechstein's bats, with all grazed fields, and in particular fields B3, B6, B7 and B8, protected from development throughout the order limits. Buckinghamshire Council has adopted a similar position throughout the examination with the latest statement of common ground between it and the applicant [REP3-016] maintaining that	The Applicant disagrees with both Natural England and Buckinghamshire Council that solar PV modules should be removed from all of Fields B3, B6, B7 and B8 and also B10, B11, D28 and D29 on the assumption that this would cause a significant effect with regards foraging bats. A full response to this question has been provided within the Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086] 1.1.5 page 5, 2.3.11 page 61 (submitted at Deadline 2) and in addition Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], RR-203 page 209 (submitted at Procedural Deadline A). However, the Applicant is still in dialogue with Natural England over Fields B3, B6, B7 and B8 and is confident that an agreement can be reached that would address the points made in their representation. The Applicant notes that the additional fields referenced by Buckinghamshire Council are not a subject of concern of Natural England, and are not part of the discussions currently in progress.

proposed infrastructure should be removed from fields B6, B7, B10, B11, D28 and D29.

Please provide a comprehensive response to both positions.

Q2.5.5 Bechstein's Bat – potential loss of foraging habitat

What would the potential impact on the proposed development be of omitting photovoltaic panels and associated infrastructure from each of the fields listed above individually and in combination?

In summary, and whilst precise figures cannot be confirmed until the detailed design stage, the following fields are indicatively capable of providing the following peak generation figures:

- Field B3: 2.1MW peak (MWp);
- Field B6: 1.3MWp;
- Field B7: 10.9MWp;
- Field B8: 3.3MWp;
- Field B10: 5.2MWp;
- Field B11: 12.6MWp;
- Field D28: 20.1MWp; and,
- Field D29: 8MWp

These fields, in total, are indicatively capable of providing 63.5MWp.

Q2.5.6 Bechstein's Bat – potential loss of foraging habitat

How do you respond to Claydons Solar Action Group's (CSAG) concerns, set out in paragraph 4.12 of [\[REP3-065\]](#) that temporary

s are proposed on fields B6, B7 and B8 and this is inconsistent with a precautionary approach?

ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds

[EN010158/APP/6.3.5] indicates that the Applicant is proposing a single temporary construction compound of 1,250m² and has indicated that it could be located within one of these four fields (B3, B6, B7, or B10) but would not constitute a compound in each field.

The Applicant estimates that the construction compound would be used for a maximum of 12-18 months in this location.

The lighting information is detailed in the **Outline CEMP [EN010158/APP/7.2.5]**. Core working hours are 7am-7pm, which avoids night-working in the majority of the bats' active season (short overlaps with dawn/dusk in spring/autumn occur, but these overlaps occur outside the more sensitive breeding season). Security lighting through the night will be passive infrared systems (not visible spectrum); the only lighting from a H&S perspective would be to the emergency exit doors etc. Details of the lighting to sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.6]**. As bats are largely nocturnal when foraging, the use of the compound is temporary, and alternative grassland foraging habitat within the bats' home range is being provided, no significant impacts on Bechstein bats were identified pertaining to the construction compound.

The Applicant maintains that it has taken a precautionary approach to the assessment of potential impacts on bats as presented in **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]** and explained in the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** (see response to [RR-049], page 317-318).

Q2.5.7 Bechstein's Bat – assessment methodology

Section 3 of NE's post issue specific hearing 1 submission [\[REP3-061\]](#) sets out a comprehensive critique of the applicant's assessment methodology for Bechstein's bats and its conclusion of a "potentially significant effect" at the

The Applicant does not agree with Natural England that the loss of 40ha of grazed grassland would constitute a negative impact (as outlined above in the response to **Q2.5.4** in particular). Of the 95ha of grassland provided within the Order Limits, 29ha is retained grassland that is being enhanced and 66ha of arable land is being converted. Thus the overall amount of grassland is a 55ha gain, not a 40ha loss.

district level. Provide a detailed response focusing in particular on NE's position that:

- The installation of Solar PV Modules should be considered as a loss of foraging habitat and as having an avoidance effect/impact on bats in the absence of mitigation (in line with a worst-case scenario assessment).
- The loss of approximately 40ha of grazed grassland and foraging habitat would constitute a significant negative impact on a nationally important population of Bechstein's bat.
- Significant impacts to this foraging habitat have the potential to negatively effect the conservation status of the species.

and its conclusion that:

"Ultimately, we disagree with the conclusion of the Environmental Statement. We advise there is a risk that the application in its current form has not mitigated potential impacts to an acceptable level and therefore a significant residual impact remains. We advise that the scheme is amended to address this risk given the national significance of the population and the uncertainty over the effectiveness of the mitigation".

The Applicant considers that the mitigation measures outlined in the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.5]** would be sufficient to ensure suitable foraging habitat is available for foraging Bechstein's bats. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]** has already considered the potential displacement effects that could occur as a result of solar PV modules and has included appropriate mitigation to offset these potential impacts.

*Whilst noting that there is no net loss, but a net gain of 55ha, the 40ha referenced represents just under 1% of the Bechstein's bat home range (4160 ha, as reported in Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats" PDF p26¹). That report further notes that 'their collective home range and Core Sustenance Zone [7,934ha] ... extends far beyond [the] discrete woodland blocks and Bechstein's bats were recorded commuting, foraging and roosting several kilometres away'. (PDF p6). It is therefore considered reasonable to suggest that providing additional grassland within the home range is acceptable mitigation, even if it does not replicate the current location of grassland. See also the response to **Q2.5.8**.*

As set out in **Paragraph 7.10.133 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]**, a *potentially* significant effect does not equate to significant and that there would be no 'significant harm' (either alone or cumulatively). This is because the impacts, predicted on a precautionary basis only, are unlikely to result in an effect at a sufficient scale to adversely change the current conservation status of the species in the longer term.

The mitigation outlined in the **Outline LEMP [EN010158/APP/7.6.5]** is designed to:

- maintain the Bechstein's bat range/distribution by avoiding woodlands and hedgerows; and
- maintain the Bechstein's bat population by providing additional grassland of better quality than is currently the case, all within the Bechstein's bat current home range.

These elements together support the maintenance of the conservation status of Bechstein's bat in the longer term. That said, as indicated earlier, the Applicant notes concerns from various parties with regard to the location and distribution of existing grazing. However, the Applicant is still in dialogue with Natural England over Fields B3, B6, B7 and B8 and is confident that an agreement can be reached that would address the points made in their representation.

Q2.5.8

Bechstein's Bat – National Policy Statement (NPS) EN-1

What is your response to Buckinghamshire Council's post ISH1 submission at paragraph 18 of [\[REP3-056\]](#) regarding the application of paragraph 5.4.55 of NPS EN-1 to the potential "harm" that it considers would be caused to Bechstein's bats by the proposed development and its conclusions?

This response should be read alongside the Applicant's response to **Q2.5.9** which refers to which paragraph in NPS EN-1 should be applied in considering the weight to be applied to any impact on Bechstein's bats.

The Applicant refers to its response regarding 'significant harm' and the planning balance that was previously provided for Q1.7.12 in **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**.

The Applicant does not believe that the Proposed Development would result in significant harm for the reasons outlined in Ref. 3.5.4 of **Applicant's Response to Deadline 3 Submissions [EN010158/AP/8.22]**.

It is noted that there is no qualification to the use of 'harm' in paragraph 5.4.55, but that distinction is clearly made in 5.4.43 and 5.4.44 (which requires such harm to be 'significant'). In addition, paragraph 5.4.55 notes that consent should be refused *where harm to a protected species and relevant habitat would result*. Here, all of the woodlands and the majority of hedgerows are being retained, and twice as much grassland is being provided or enhanced as is being lost and therefore there is no harm to the relevant habitat needed to support Bechstein's bat.

It is worth reiterating that, whilst Natural England and others have expressed concerns about the fields between Shrubs Wood, Decoypond Wood and Sheephouse Wood, the three breeding colonies that comprise the single

¹ <https://publications.naturalengland.org.uk/file/6128248514412544>

population of Bechstein's bats are centred on three different woodlands: Finemere Wood SSSI, Grendon and Doddershall Woods SSSI and Ham Home-cum-Ham Green Woods SSSI (as stated in Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats" PDF p5).

Q2.5.9

Bechstein's Bat – NPS EN-1

Provide a detailed response to Buckinghamshire Council's position set out in paragraph 16 of [\[REP3-056\]](#) that harm to Bechstein's bat would be a reason to attribute substantial weight against the proposed development in the planning balance in accordance with paragraph 5.4.55 of NPS EN-1 rather than significant weight in accordance with paragraph 5.4.23 of NPS EN-1 which the applicant appears to be relying on.

What would the implications be of such harm and the requirements for a proposed development to attract the critical national priority Infrastructure presumption?

The Applicant understands that the ExA had meant to reference Paragraph 5.4.43 of NPS EN-1, as opposed to Paragraph 5.4.23.

The distinction between paragraph 5.4.55 of NPS EN-1 and 5.4.43 is that 5.4.55 directs the Secretary of State to refuse consent where harm to a protected species *and* relevant habitat would result, unless there is an overriding public interest and the other relevant tests are met, and also to attribute substantial weight to that harm; whereas 5.4.43 relates to the weight that the Secretary of State should give to residual harm to biodiversity which cannot be avoided, adequately mitigated or compensated for.

As noted in the response to **Q2.5.8**, there is no qualification to the use of 'harm' in paragraph 5.4.55, but that distinction is clearly made in 5.4.43 (i.e. that it should be significant). The Applicant would agree that, were there a risk of harm sufficient to cause an extreme change in conservation status (i.e. a local extinction), then it would be appropriate to give that outcome substantial weight. A local extinction, in theory, *could* result from a decrease in breeding success over time; the causes of such a change *could* indeed be development, but also land management and climate change, alone or in combination.

However, the contribution of the Proposed Development to such an impact has been limited through mitigation that is designed to maintain or provide the elements that Bechstein's bats (and other bat species) would need to thrive. Areas which are known to support their roosts are being retained; foraging will be increased and improved (notably close to the closest known breeding colony of Finemere Wood); and connectivity to ensure bats can access all areas of their home range will be strengthened.

The Applicant considers that the relevant test in paragraph 5.4.55 NPS EN-1 does not refer to any form of harm, rather it should be construed as referring to significant harm to the conservation status of the species.

The Applicant therefore considers there is no credible pathway to such significant harm; the reasons are further explained in the response to **Q2.5.7**, and therefore paragraph 5.4.43 of NPS EN-1 (not 5.4.55) would apply.

With the above in mind, the planning policy afforded to the Proposed Development by virtue of it being of a Critical National Priority is not disapplied under the exceptions listed under Paragraph 4.2.15 of NPS EN-1 (2023) should significant harm be concluded (as none of those exceptions apply) under paragraph 5.4.43 of NPS EN-1. Since paragraph 5.4.55 of NPS EN-1 is not applicable for the above reasons, this is not considered further.

Q2.5.10

Bechstein's Bat – buffer widths

In its deadline 3 submission [\[REP3-061\]](#) at paragraphs 1.20 to 1.27 NE makes the case that to avoid fragmentation, buffers should not be measured from a centre line of existing hedgerows (as currently proposed by the applicant) but on a precautionary basis be based on an agreed width (10-15m either side of a field) on top of the existing ecological features representing the baseline conditions.

Please provide a comprehensive response.

The Applicant refers to the response regarding the measurement of hedgerow buffers previously provided within the **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** and secured within the **Design Commitments [EN010158/APP/5.9.6]**. The spatial extent of development as set out in the DCO Application has similarly been based on offsets from the centreline of the hedgerows. This is considered to be the most consistent data source available across the Site.

The approach taken to date has been to increase buffer widths in areas where the corridors are considered to be more sensitive (including, but not limited to, the fields between Shrubs Wood, Decoypond Wood and Sheephouse Wood). The Applicant is willing to review the size of buffers in particular locations as part of the evolving bespoke approach to buffers, and has requested that Natural England make location-specific recommendations.

From a bat perspective, the principal function of the buffers is to ensure continued commuting, thus avoiding fragmentation. The hedgerows within the buffers facilitate navigation (as well as providing shelter, insect prey etc), and the buffer width (the distance between Solar PV modules in adjacent fields) mitigates for the presence of the

Solar PV modules themselves, should that be the cause of any displacement effect. The hedgerow width/height within any buffer does not affect the distance between Solar PV modules.

Q2.5.11 Bechstein's Bat – effectiveness of proposed mitigation

How do you respond to CSAG's concerns set out in paragraphs 4.15 and 4.16 of [\[REP3-065\]](#) about what it considers to be inconsistencies on the part of the applicant with regard to the importance of grazing as a mitigation and the likelihood of its delivery?

As set out in the **Outline LEMP [EN010158/APP/7.6.5]**, the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground-nesting birds is to increase botanical diversity and hence invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland. The Applicant has indicated its willingness to secure grazing as part of the long-term management regime (and has had positive discussions with tenants who may be willing to provide either sheep or cattle grazing). This recognises that the presence of livestock may have some advantages but also that there may be factors outside of its control that could prevent grazing, such as the outbreak of a disease affecting sheep and/or cattle. Therefore, the Applicant has given mechanical mowing and collection as an alternative option should grazing not be possible at any point in time or location(s).

Q2.5.12 Bechstein's Bat – effectiveness of proposed mitigation

In response to the ExA's written question 1.7.14(4) [\[REP2-087\]](#)* you maintain that in the absence of proposed grazing the mitigation would still be effective.

This appears to have been based on an acoustic survey data obtained from High Speed 2 (HS2) which suggests field B7 does not show extensive use by Bechstein's bats and ignores the contrary findings of Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats".

Please confirm or otherwise that you still consider the proposed mitigation for Bechstein's bats would be effective without grazing, referencing the evidence in support of your position.

*assumed to refer 1.7.16(4)

As outlined above for **Q2.5.11**, the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground-nesting birds is to increase botanical diversity and hence invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland.

The Applicant considers the proposed mitigation for both Bechstein's bats and foraging birds would still be effective in the absence of grazing. As outlined in the **Applicant's Response to the Examining Authority's First Written Questions [REP2-087]** Q1.7.14, evidence presented by the RSPB has shown that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape. In addition, a very recent paper² has shown that ground-nesting corn bunting are foraging under panels including commuting to forage within the solar park from adjacent habitat. In both cases, it was suggested that solar farms designed with biodiversity in mind support a greater diversity of invertebrates than intensively managed grassland and arable cropland. Since the ES was published, at least one study (Szoldatits *et al.*, 2025³) has found increased bat activity at ecovoltaic solar sites (though not for all species in all seasons, and the study was undertaken in the US not in the UK (see **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] Appendix 2**). This does suggest that the wider suite of measures in the **Outline LEMP [EN010158/APP/7.6.5]** will be effective at providing a foraging resource for both ground-nesting birds and bats.

The assessment therefore does not ignore the findings of Natural England's report; the mitigation provides grassland over a wider area than currently exists. The mitigation focuses on where Bechstein's bats maternity roosts have been identified over multiple years, as noted in earlier responses above – see also response to **Q2.5.9** - and also provides grassland in the vicinity of Decoypond Wood and Sheephouse Wood (Fields B9 and B17).

Q2.5.13 Bechstein's Bat – management of habitat and grazing

In its deadline 3 submission [\[REP3-061\]](#) at paragraph 1.31 NE maintains that it is not just the presence of grazing which is important for foraging Bechstein bats, but also the frequency and timing of grazing, as well as stocking

As outlined above for **Q2.5.11** the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground nesting birds is to increase botanical diversity and hence invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland.

The Applicant does consider that there is a potential conflict between maintaining botanical diversity and intensive grazing as too much grazing pressure is likely to reduce the botanical diversity at key times of the year which would

² Observations on the use of a solar park by Corn Buntings in southern England British Birds 2026 Vol.119: Pages 208–217 available online <https://britishbirds.co.uk/journal/article/observations-use-solar-park-corn-buntings-southern-england>. Accessed 16 June 2026.

³ Szoldatits, K. E., Walston, L. J., Hartmann, H. M., Fox, L., Stanger, M. E., Steele, S. E., Hogstrom, I., & Macknick, J. (2025). Bat activity at ecovoltaic solar energy developments in the Midwestern United States. *Global Ecology and Conservation*, 63, e03864. Available at: <https://doi.org/10.1016/j.gecco.2025.e03864>. 'Ecovoltaic' sites co-prioritise electricity generation and ecosystem function to align renewable energy development with biodiversity conservation.

density. The latest outline Landscape and Ecological Management Plan (oLEMP) [\[REP2-067\]](#) suggests the creation of species rich grassland in the mitigation areas with any grazing of this grassland to take place as aftermath grazing, in the autumn and winter and with a low stocking density, so as to create and maintain the floristic diversity that is required for achieving landscape and botanical objectives.

Is there a conflict between achieving landscape and botanical objectives and mitigating the effects of the proposed development on Bechstein's bats?

likewise reduce invertebrate diversity, so there is a balance to be struck. Low-intensity grazing at low stocking densities with stock being moved frequently (as proposed in the **Outline LEMP [EN010158/APP/7.6.5]** and secured by Requirement 7 in the **Draft DCO [EN010158/APP/3.1.7]**) would strike the correct balance between botanical diversity (and in turn increasing invertebrate biomass) and bat foraging objectives and grazing would be timed for key periods in the life cycle of Bechstein's bats. Final objectives with regard stocking rates and timing of grazing would be included in the detailed Landscape and Ecological Management Plan, subject to approval by the relevant planning authority in consultation with the Environment Agency and Natural England.

Q2.5.14

Bechstein's Bat – management of habitat and grazing

In relation to grazing the current oLEMP [\[REP2-087\]](#) (paragraph 5.2.3) states "Opportunities for grazing will be considered where practicable and is viable with details such as timings and stocking densities to be provided in the LEMP(s) at the detailed design stage".

Given the cautious language used by the applicant, how likely is it that any significant level of grazing would be achieved on the proposed development? What discussions and with what parties have taken place to date and have any commitments been made or agreements signed?

The Applicant intends to use grazing as the preferred management method for grassland, as outlined in response to **Q2.5.13** above. Grazing currently takes place on solar farms throughout the UK and is a proven and viable method of grassland management. Grazing will be implemented at Rosefield unless there are extenuating circumstances outside of the Applicant's control, such as an outbreak of disease requiring the animals to be kept indoors or quarantined, or in the highly unlikely event that the Applicant cannot procure a flock of sheep or herd of cattle. The **Outline LEMP [EN010158/APP/7.6.5]** provides for flexibility in case of such extenuating circumstances so that the grassland could still be managed to deliver the environmental objectives of the Proposed Development. However, the Applicant is confident that grazing is deliverable at the Proposed Development.

Opportunities to provide cattle and sheep grazing have been discussed with existing agricultural tenants and it is highly likely that the grazing will be delivered in partnership with existing tenants and/or local farmers. No firm commitments or agreements have been reached at this early stage as such agreements are normally signed at the procurement stage post-consent and prior to operation.

Q2.5.15

Bechstein's Bat – monitoring

How do you respond to CSAG's concerns set out in paragraphs 4.17 and 4.18 of [\[REP3-065\]](#) that monitoring is being used as mitigation?

The Applicant considers that the mitigation as outlined in the **Outline LEMP [EN010158/APP/7.6.5]** (and secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.7]**) is adequate and follows the mitigation hierarchy. Monitoring is not being used as mitigation; monitoring will be undertaken against specific objectives to ensure that these objectives are being met. Such monitoring will be used to determine if management regimes need to be amended to achieve the intended objectives (see Section 6.2 of the **Outline LEMP [EN010158/APP/7.6.5]**). Further details with regards monitoring objectives have been provided within the **Outline LEMP [EN010158/APP/7.6.5]** submitted at Deadline 4.

Q2.5.16

Bechstein's Bat – monitoring

With regard to the monitoring strategy for effects of the proposed development on Bechstein's bats to be submitted at deadline 4 (ISH1 action 14 [\[EV7-018\]](#)) please:

1. Clearly outline the methodology you propose for establishing the baseline.
2. Set out the methods to be used and frequency of data collection.
3. Confirm or otherwise, that you only propose that the monitoring regime would use adaptive measures to alter the ongoing management of habitats and not

The comment is noted. The Applicant has updated the **Outline LEMP [EN010158/APP/7.6.5]** submitted at Deadline 4 to clearly address these listed items 1-4 in this question.

In relation to Point 3, Natural England's opinion (expressed in a meeting on 10 June 2026 and to be included in the **Draft Statement of Common Ground with Natural England [EN010158/APP/5.14]** [\[REP1-025\]](#) that will be updated at a future deadline) is that it would be better to get to a position where the layout was acceptable than to rely on Solar PV module removal at a later date once investment in those modules had been made. The Applicant shares this view and therefore no removal of Solar PV modules and associated infrastructure would arise as a result of monitoring results.

- involve the removal of PV panels and associated infrastructure.
4. If adaptive measures only would be used to alter the ongoing management of habitats explain what these would likely be.

Q2.5.17

Ground nesting birds

Provide a detailed response to the concerns raised by CSAG with regard to ground nesting birds set out in paragraphs 5.1 to 5.5 of [\[REP3-065\]](#).

The Applicant has responded to each of the issues raised by CSAG below:

Paragraph 5.1

ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] has clearly assessed impacts on four assemblages of birds separately (ground nesting birds, non-ground nesting birds, Schedule 1 bird species and wintering birds). Although individual species have slightly different requirements during both the winter and breeding season, the overall impacts arising from the Proposed Development will be similar (displacement due to habitat modification for example). Therefore, in the case of ornithology, it is proportionate to consider impacts at the level of the overall assemblage and not the individual species. It is common practice in EIA to assess some species groups at the assemblage level where the nature of likely effects is broadly similar. The situation with bats is not the same, and the decision was therefore taken to assess Bechstein's bat and barbastelle separately from the main bat assemblage, given these two species are two of our rarest and consequently listed on Annex II of the Habitats Directive. Wintering raptors, lapwing and golden plover are important aspects of the landscape, hence the County valuation of the assemblage, but it needs to be understood that wintering species are unlikely to show strong fidelity to specific parts of the Order Limits given the wide availability of agricultural land in the landscape. Wintering birds will wander widely in search of foraging. Notwithstanding this, the Applicant has provided mitigation in the form of open uncluttered fields, together with retention of all woodland, the majority of hedgerows and wide grassland buffers ensuring that wintering species can still forage in the locality should they choose to do so. Mitigation measures are detailed in the **Outline LEMP [EN010158/APP/7.6.5]** and secured by Requirement 7 of the **Draft DCO [EN010158/APP/3.1.7]**.

Paragraph 5.2

Section 5.4 of NPS EN-1, Paragraphs 2.10.75 to 2.10.92, Paragraphs 2.10.128 to 2.10.130 and Paragraphs 2.10.154 to 2.10.156 of NPS EN-3 and Section 15 of the NPPF do not require the removal of all ecological effects, nor do they require the direct replacement of habitat for all breeding pairs but they do emphasise the importance of proportionate mitigation. The Applicant has focused on addressing the prime three reasons for the long-term decline of farmland birds, these being:

- Lack of invertebrate prey for young during the breeding season
- Long term national changes to cropland and grassland management making areas less suitable for nesting reducing breeding success
- Loss of winter seed source during the winter months

The effects of habitat loss need to be assessed in the context of the baseline conditions. Skylark and other breeding bird populations in farmland are declining due to modern agricultural practices which reduce breeding productivity and increase mortality. Skylarks can raise up to four clutches (but more typically three) in a breeding season⁴ and the number of broods successfully fledged in a year is a strong indicator of a sustainable population, with two to

4

Royal Society for the Protection of Birds (undated). Land management for wildlife: Skylark *Alauda arvensis* Available at: <https://www.rspb.org.uk/helping-nature/what-we-do/influence-government-and-business/farming/advice-for-farmers-helping-bird-species/skylark-advice-for-farmers> [accessed on 10/10/2024]

three broods typically needed to sustain a population. Skylarks nest at low density in winter-sown cereals, possibly as few as 0.1 territories per hectare⁵, where they may be limited to a single brood, driven largely by the unfavourable timing of sowing and harvesting; the latter also reducing survivorship. The breeding bird results estimates skylark is nesting at a density of 0.14 per ha within the Order Limits. Only about one in four nests survive in farmland over a season and a nest in winter-sown cereals may raise only 1.2 chicks per nesting attempt. Consequently, despite the widespread occurrence of the species in the landscape, it is likely that the intensive agricultural habitats in the Order Limits (as for most of Britain) support a sink population; that is, a population with a higher death rate than birth rate which may be declining or relies on immigration to sustain it. So even in the absence of solar development, farmland bird populations may be expected to continue to decline. The **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]** has concluded a significant beneficial effect on farmland birds at the local level, which is in line with studies cited under response to **Q2.5.12**.

The mitigation measures detailed in the **Outline LEMP [EN010158/APP/7.6.5]** will provide alternate areas of breeding habitat that will not be subject to disturbance during the breeding season that can affect bird using existing arable cropping where harvesting at inappropriate times of year and crop structure can reduce breeding success. All the mitigation measures need to be considered as a suite of measures collectively (not individually) and are designed to ensure that a viable population of farmland birds can be maintained in the long term.

The **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006]** provided evidence that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape which are the baseline habitats at Rosefield.

Accordingly, the Applicant maintains that its assessment of potential impacts on the relevant species is robust and appropriate.

Paragraph 5.3

Some of the fields to the north of Finemere Wood are gently sloping; however, these fields are not so steep as to prevent arable management and these fields already support low numbers of farmland birds including skylark, yellow hammer and linnet. The Applicant does not consider the topography of these fields a barrier to using them for mitigation, given that ground-nesting species are already present, and believes that, with appropriate management, the carrying capacity can be increased. Also, as outlined above for paragraph 5.2, the mitigation measures for birds need to be considered collectively and not in isolation.

Paragraph 5.4

As outlined above, National planning policy does not require the removal of all ecological effects, nor does it require the direct replacement of habitat for all breeding pairs but emphasises proportionate mitigation, which is what the Applicant has endeavoured to do. A recent paper⁶ peer-reviewed by Mr Woodfield (who is acting on behalf of CSAG) has indicated that “*mitigation measures should be proportionate and reasonable, so should focus on improving habitat quality at an appropriate scale, rather than attempting to mitigate for all displaced species*”. As indicated in the responses above the Applicant believes the mitigation proposed is both proportionate and at an appropriate scale.

5

Donald, P. F. & Vickery, J. A (2000). The importance of cereal fields to breeding and wintering skylarks *Alauda arvensis* in UK. In Aebischer, N. J., et al. (eds) (2000). *Ecology and Conservation of Lowland Farmland Birds*. British Ornithologists' Union.

⁶ Solar Energy UK, Solar farms and Skylarks June 2026. <https://solarenergyuk.org/resource/solar-farms-and-skylarks/>

Also, the Applicant does not accept that the fact the Applicant has identified a bird assemblage of County value automatically means that any potential impacts likely to arise to that assemblage are also of County level. In order for potential impacts to be at County level, they would need to significantly adversely affect the bird assemblage of Buckinghamshire as a whole. This would not be the case as per the conclusions reached within the **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]**.

Paragraph 5.5

The Applicant has been wholly transparent with regards to the results of winter and breeding bird surveys and is basing its conclusions on the results of standardised, good-practice surveys of the Site. The Applicant notes that, by comparison, paragraph 5.5 contains predominantly anecdotal observations of relevant territory numbers in the area. With regard to golden plover and lapwing, these are wintering species not recorded as breeding. Winter species range widely during the winter months with a large proportion of wintering birds being visitors from the continent. It is unlikely that wintering birds show strong fidelity to specific parts of the Order Limits given the wide availability of agricultural land in the landscape. Consequently, a high degree of displacement can be expected without detriment to the birds, and no significant effects were identified in the assessment. It should be noted Golden plover and lapwing were only recorded once during the 2024 wintering surveys and lapwing were recorded twice during the 2002 surveys and only a single golden plover recorded which does suggest strong dependence on the habitats at the Proposed Development site (see **ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4] [APP-089]** and **ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4.2] [REP1-058]**).

Notwithstanding this the management of 95ha of open uncluttered grassland will provide both species with additional habitat suitable for winter foraging as well as benefits for breeding species so the Applicant refutes the assertion that it is relying on the use of farmland outside the Order Limits as mitigation for the Proposed Development.

Q2.5.19

Cumulative assessment

In the latest statement of common ground (SoCG) between you and Buckinghamshire Council [\[REP3-016\]](#), there is still no agreement on the Council's position that a cumulative assessment of the combined losses of arboricultural features across multiple schemes should be undertaken. Provide an update on the latest discussions and positions of the two parties.

The Applicant discussed this comment in a meeting with Buckinghamshire Council on 5 June 2026 whereby Buckinghamshire Council noted that this was related to their concern that the Order Limits of the Proposed Development overlap with the HS2 Act land limits and would place Solar PV modules in areas designated or already planted as woodland by HS2.

The Applicant is aware that some parcels of the land within the Order Limits are covered by the Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation.

This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we plan to submit to the Examining Authority, once available.

The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the **Outline LEMP [EN010158/APP/7.6.5]**. Buckinghamshire Council have noted this response and this matter is now agreed within the updated **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.4]** submitted at Deadline 4.

Q2.5.20

Hedgerow removal

The Applicant notes the comment. Most of the hedges are sectional removals within an extensive retained network which in many cases, for example the cable route, will be reinstated on completion of the works. The existing

In the latest SoCG between you and Buckinghamshire Council [\[REP3-016\]](#), there is still no agreement on the Council's position that there would be fragmentation of ecological networks in the Bernwood Opportunity Area due to the loss of approx. 2,060m of hedgerow. Provide an update on the latest discussions and positions of the two parties.

framework of hedgerows remains largely intact and is supplemented by new planting as detailed in the **Outline LEMP [EN010158/APP/7.6.5]**. The only potential complete hedgerow removal relates to Hedge H270, which lies within the footprint of the proposed Rosefield Substation. Up to c.2,060m of hedgerow could be removed during construction, however, to c.750m of hedgerow will be re-instated on completion of construction works, approximately c.3420m of hedgerow will be newly planted, of which a proportion will be early planting ahead of construction works commencing. The Applicant is still of the opinion that there would not be a fragmentation of the ecological network due to the proposed re-instatement of hedgerows, new hedgerow planting and enhancement of retained hedgerows, and provision of buffers from hedgerows, however Buckinghamshire Council and the Applicant have not reached an agreement on this matter.

Table 2-6.1: Compulsory acquisition, temporary possession and other land or rights considerations

ExQ2 Ref	Question	Applicant's Response
Q2.6.1	Alternatives to Compulsory Acquisition With reference to The Planning Act 2008 guidance related to procedures for the compulsory acquisition (CA) of land, including paragraph 8, how can the Examining Authority (ExA) be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored? Set out what assessment/ comparison has been made of the alternatives to the proposed acquisition of land or interests for each affected person identified in the Book of Reference [REP3-008].	Paragraph 8 of the DCLG Compulsory Acquisition Guidance (September 2013) (CA Guidance) relates to procedures for the compulsory acquisition of land and states that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Applicant must also demonstrate that the proposed interference with the rights of those with an interest in land is for a legitimate purpose that is necessary and proportionate. The Applicant has considered reasonable alternatives to CA, as required by the statutory tests and CA Guidance, including in its systematic process to determine a suitable site at first instance (see Site Selection Report which has been prepared and forms Appendix 1 of the Planning Statement [EN010158/APP/5.7.6]), through alternative layouts and configurations (see ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]) and through design evolution which has been informed by consultation (see Consultation Report [EN010158/APP/5.1] [APP-020]). The Applicant's Statement of Reasons [EN010158/APP/4.1.3] [REP1-010] details why it is necessary to seek powers of compulsory acquisition, and section 5.6 sets out the alternatives to CA that the Applicant has considered by reference to other application documents and concludes that none of the alternatives or modifications considered for the Proposed Development would obviate the need for powers of compulsory acquisition powers and temporary possession over the Order Land. The Applicant has sought to minimise compulsory acquisition as far as possible and has sought, and continues to seek, the necessary land rights for the Proposed Development through voluntary agreements with landowners. The Land and Rights Negotiations Tracker [EN010158/APP/8.8.3] sets out the status of these negotiations with each affected person identified in the Book of Reference [EN010158/APP/4.3.4] [REP3-008]. The Applicant notes that the majority of the Site for the Proposed Development is under option with a single landowner, meaning voluntary agreement has been reached. The Applicant submits that this demonstrates that all reasonable alternatives to compulsory acquisition have been explored. As explained in sections 5.8 and 5.9 of the Statement of Reasons [EN010158/APP/4.1.3] [REP1-010], whilst the Applicant is seeking to agree the terms for all land and rights required, it remains necessary for the Applicant to seek compulsory acquisition powers over all of the Order Limits (which is typical for NSIPs). This is necessary to secure the required land, rights and interests and to ensure that any third-party interests or encumbrances affecting such land, rights and interests may be acquired, overridden or extinguished pursuant to the draft DCO, and to provide for

any circumstance where voluntary agreements are not adhered to. This approach ensures that the Proposed Development can be constructed, operated and maintained without impediment.

Q2.6.2

Compelling case in the public interest test

Section 122 of The Planning Act 2008 requires the Secretary of State to be satisfied that there is a compelling case in the public interest for land to be acquired compulsorily. Paragraph 14 of The Planning Act 2008 guidance related to procedures for the CA of land states that "In determining where the balance of public interest lies, the Secretary of State will weigh up the public benefits that a scheme will bring against any private loss to those affected by compulsory acquisition."

If it is demonstrated that the proposed development may impact medical supplies to the National Health Service (NHS), should the Secretary of State also take account of any related public disbenefit as well as private loss when weighing against public benefits in determining if there is a compelling case in the public interest for the CA of Preston Farms Limited's interests?

Under section 122 of the Planning Act 2008, compulsory acquisition powers may only be granted if the Secretary of State is satisfied that the land is required for the Proposed Development (or is required to facilitate it or is incidental to it), and if there is a compelling case in the public interest for inclusion of the powers.

The Applicant's **Statement of Reasons [EN010158/APP/4.1.3] [REP1-010]** sets out how the Applicant has complied with section 122 in respect of all the land in which the Applicant seeks powers of acquisition and temporary possession over – including land in which Preston Farms Limited (Ltd) has an interest in. Sections 5.3 and 5.5 of the **Statement of Reasons [EN010158/APP/4.1.3] [REP1-010]** address how the limbs of the conditions in section 122 have been met. For the purposes of satisfying these compulsory acquisition tests, it is relevant to note that TCS Biosciences Ltd (being the business which supplies the blood agar to the NHS), does not have an interest in any of the land within the Order Limits. Only Preston Farms Ltd holds a tenancy interest in parts of the Order Land, which is explained in detail in the note on the **Tenancy Position of Preston Farms Ltd [EN010158/APP/8.30]** submitted at Deadline 4.

The Secretary of State must be satisfied that there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition in the DCO, and in doing so, must be persuaded that the *public benefits* from the compulsory acquisitions will *outweigh the private loss* suffered by those whose land is to be acquired (emphasis added). The test is not to consider the "related public disbenefits," though the Applicant accepts that in considering public benefits, regard to any public disbenefits is a natural consequence. However, the Applicant maintains that there is no quantifiable evidence before the Examination which demonstrates that the medical supplies of the NHS would be impacted as a result of the Proposed Development, and therefore any public disbenefit suffered. The Applicant has recognised Preston Farms Ltd's sister business, TCS Biosciences Ltd, as a high/very high non-agricultural business receptor in its **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.3]** and has assessed the residual effect on this business as not significant. The Applicant has been pro-active in engaging with both Preston Farms Ltd and TCS Biosciences Ltd in understanding their concerns and offering additional mitigation.

In terms of the Secretary of State's consideration of any private loss suffered by Preston Farms Ltd specifically, the Applicant has detailed all the ways in which it has sought to minimise any private loss suffered by Preston Farms Ltd at **Appendix 1 to the Applicant's Written Summary of Applicant's Oral Submissions at the Compulsory Acquisition Hearing 1 (CAH1) [REP1-107]** entitled 'Approach to Minimising Private Loss'. The Applicant continues to engage with Preston Farms Ltd on an ongoing basis throughout the examination to seek to further mitigate potential impacts, such as the removal of the temporary construction compound from Field E23 and through agreeing biosecurity measures in the **Preliminary Biosecurity Statement [EN010158/APP/8.28]** submitted at Deadline 4.

In reference to the public benefits brought about by the Proposed Development, the Applicant refers to its **Statement of Need [EN010158/APP/5.6] [APP-036]** for submissions on how the Proposed Development satisfies all relevant government policy and supports the urgent need for Critical National Priority infrastructure. The **Planning Statement [EN010158/APP/5.7.6]** presents the planning balance, concluding that "*the limited adverse impacts of the Proposed Development in isolation after mitigation (which are limited to biodiversity, heritage and landscape and visual effects) and adverse inter-project impacts remaining after mitigation (which are limited to biodiversity and landscape and visual effects) are not considered to outweigh the Proposed Development's demonstrable and substantial benefits.*"

Q2.6.3

Update on negotiations

To the applicant:

In addition to providing an updated **Land and Rights Negotiations Tracker [EN010158/APP/8.8.3]** the Applicant responds to the specific points raised as follows:

Provide an updated Land Rights and Negotiations Tracker ("the tracker") [\[REP2-081\]](#) on negotiations with all affected persons. Ensure that the update addresses the following in relation to the latest version of the tracker:

1. With the reference to AEJ and FJ Claridge, the tracker states that there "are agreed heads of terms and the legal agreement is currently being progressed." It later states that the "parties are working towards conclusion of the legal documentation." However, matters do not appear to be agreed [\[REP2-123\]](#). Please update accordingly.
2. The tracker indicates that discussions are ongoing with Preston Farms Limited and the applicant is "seeking voluntary agreement by the end of the examination." The latest submission from Preston Farms Limited and TCS Biosciences Limited suggests an agreement is not close at present. They also argue [\[REP3-067\]](#) that the private loss resulting from the impact on their business will be very considerable. Please comment on this.
3. Update on the latest position in relation to replacement land for tenants. The tracker states that heads of terms for the replacement land are agreed with Preston Farms Limited and AEJ and FJ Claridge but based on evidence before the examination, this does not appear to be accurate.
4. What is the latest position with the negotiations with Terence Ives [\[REP1-126\]](#)? The tracker suggests that little progress has been made to date.
5. The position as reported in the tracker concerning resolution of the landholding owned by Jeremy Fennemore is more hopeful that agreement can be reached during the examination. Again, please provide an update on the negotiations.
6. The applicant confirms that it has concluded negotiations with the Claydon Estate and that a legal agreement has been secured. Can this be confirmed by the Claydon Estate?

To affected persons:

Affected persons are also invited to provide an update to negotiations regarding the compulsory acquisition of land and/or rights from their perspective and to outline any outstanding concerns.

1. Heads of Terms are agreed, which form the basis of terms to be agreed in the Legal Agreement. The Applicant confirms that significant progress has been made towards the completion of the Legal Agreement with the Claridges. The completion of the Legal Agreement was delayed due to the issues in respect of plot 2/6 and access to the well at Knowl Hill. Both issues have now been resolved by the Applicant in its Deadline 3 responses and we anticipate the Legal Agreement to be completed shortly.
2. TCS Bioscience Ltd do not have an interest in the land within the Order Limits, and therefore there is no negotiation for a voluntary agreement with this party. Heads of Terms have been agreed between Preston Farms Ltd and the Estate (Landlord) which enables the Landlord to obtain possession of the land within the Order Limits and provides Preston Farms Ltd with a long term interest in land outside of the Proposed Development boundary, replacement land for the land to be vacated for the Proposed Development and rights of access for the Applicant over other Preston Farms Ltd tenanted land. If the agreement is not completed the Landlord can still obtain possession of the land required for Solar Development without the use of compulsory purchase powers. It would mean Preston Farms Ltd miss out on the significant benefits of the agreement. The Applicant refers to the **Tenancy Position of Preston Farms Ltd [EN010158/APP/8.30]** in respect of the Preston Farms Ltd occupational interests. The Applicant has put in place multiple measures to try and minimise the impact on Preston Farms Ltd and continues to work with them on this matter.
3. The Applicant confirms that Heads of Terms (which include provision for the replacement land) are agreed and were signed in September 2025. Neither AEJ and FJ Claridge nor Preston Farms Ltd have disputed this fact. It is the Legal Agreements between the tenants and the Claydon Estate LLP which are not yet completed with either tenant. As noted above, the Legal Agreement with the Claridges is expected to complete shortly. The Legal Agreement with Preston Farms Ltd is still under negotiation including discussions over the condition of the replacement land as part of the agreement.
4. Progress has not been possible due to a difference in the commercial terms of an agreement. The latest offer was made by the Applicant in February 2026 but despite subsequent telephone conversations between the agents it has not been possible to reach an agreement.
5. Please see the **Land and Rights Negotiations Tracker [EN010158/APP/8.8.3]**. Negotiations have been held with the freehold owner. The Applicant issued terms in February 2026 and whilst email correspondence has taken place between Gateley Hamer and the landowner's agent there has been no substantive response to the terms offered.
6. The Applicant and the Claydon Estate have completed an Option Agreement that provides the Applicant with an option to acquire a long-term lease over the land as confirmed by the Claydon Estate in the letter at Appendix 1 to the **Tenancy Position of Preston Farms Ltd [EN010158/APP/8.30]** submitted at Deadline 4.

Q2.6.4

Voluntary agreements

The Applicant is committed to seeking voluntary agreements with all parties. If voluntary agreements are not reached by the conclusion of the Examination the Applicant will continue to negotiate in order to try and reach an agreement.

1. If voluntary agreements with affected persons are not forthcoming, how should the ExA and the Secretary of State address this position in our considerations?
2. In light of the current status of negotiations and extent of outstanding issues with affected persons, provide further commentary to demonstrate that reasonable efforts have been made by the acquiring authority to negotiate the purchase of land by agreement.

If voluntary agreements are not forthcoming in the timescales required to deliver the Proposed Development, then the Applicant will need, as a last resort, to rely on any powers of compulsory acquisition which have been sought in the DCO.

The Applicant and the Claydon Estate, in respect of its tenants, has continued to engage and discuss issues with affected parties and all parties have received offers. Please see response to **Q2.6.7** below for more details in respect of Private Loss and the **Land and Rights Negotiation Tracker [EN010158/APP/8.8.3]**.

Q2.6.5

Statement of Reasons

Paragraph 5.8.2 of the Statement of Reasons [\[REP1-010\]](#) states "There are three tenants on the Claydon Estate to which detailed heads of terms for relocation or vacation agreements are agreed." It appears from submissions from Preston Farms Limited and AEJ and FJ Claridge that this may not be the case. Please update the Statement of Reasons as appropriate.

Heads of Terms are agreed between the Claydon Estate LLP and AEJ and FJ Claridge and separately between Preston Farms Ltd and the Claydon Estate LLP so the **Statement of Reasons [EN010158/APP/4.1.3] [REP1-010]** is correct and does not need to be updated for this Deadline. It is correct to state that the legal agreements in respect of those agreed Heads of Terms are not yet complete.

Q2.6.6

Removal of plot 2/6

The ExA notes that the Land Plans [\[REP3-004\]](#), Works Plans [\[REP3-005\]](#) and Book of Reference [\[REP3-008\]](#), were updated at deadline 3 to remove plot 2/6. The latter states that "following discussion with the landowner we no longer need rights in this area"

To the applicant:

1. Please elaborate on the reasons for the removal of plot 2/6.
2. Update the Land and Rights Negotiations Tracker to reflect the removal of plot 2/6

To A.E.J. & F.J. Claridge:

Does the removal of plot 2/6 address any of your concerns set out to date, including in relation to the operation of your farm?

Plot 2/6 consisted of a property known as the 'drying shed' which was included in the Order Limits in respect of a requirement for Rights only. The rights related to access to Parcel 1a but on review, rights over the building are not required and therefore have been removed.

The Applicant can confirm that Plot 2/6 has been removed from the **Land and Rights Negotiation Tracker [EN010158/APP/8.8.3]**.

Q2.6.7

Private loss

The applicant's response to action point 4 from compulsory acquisition hearing 1 [\[REP1-107\]](#) provided further information on its approach to minimising private loss. Whilst paragraph 1.1.4 of the response references Mr Fenemore, Mr Bullman, Mr Ives and National Grid Electricity Transmission, it primarily focusses on providing

Mr Fenemore – Mr Fenemore is the occupant of land owned by Corpus Christi College. The Applicant has engaged with agents acting for Corpus Christi College who in turn have been engaging with their tenant. Heads of Terms for an option to acquire the land are in negotiation and include financial payments for land acquired but also commitments to compensation for losses suffered by the tenant, commitments for replacement fencing and planting and the potential provisions of a new gate. All of these provisions are to mitigate the private loss of the tenant. The Applicant currently awaits a response from the landowner's agents in respect of the latest offer made.

details relating to the respective interests of Mr Fowler, Preston Farms Limited and A E J and FJ Claridge. Please provide corresponding details for other affected persons, expanding on how the applicant has sought to minimise private loss.

Mr Bullman – The Proposed Development requires the acquisition of rights only in order to ensure a cable connection into the proposed new National Grid East Claydon Substation. Mr Bullman owns part of the land where the new Substation might be sighted. The impact on Mr Bullman is limited to underground cables and therefore any loss will be restricted to crop loss as a result of constructing the cable and the imposition of an easement, although the land can continue in its current farming use. Mr Bullman has reached an agreement with Statkraft for the development of land to the north of the Order Limits. Statkraft also require a cable connection over plot 7/2. Mr Bullman has asked that the Applicant and Statkraft work together to ensure the Proposed Development does not impact the Statkraft proposals. The Applicant has entered into discussions with Statkraft and negotiations for a Co-operation Agreement and a Crossing Agreement setting out how the two parties can co-exist are well advanced. The Applicant continues to negotiate with Mr Bullman over commercial terms for an option agreement for the cable route with the only outstanding matter relating to the amount of financial compensation.

Mr Ives – Negotiations have been held with Mr Ives' agent. As part of those negotiations, agreement has been reached in respect of the shape of the land to be acquired, the extent of the acquisition (subject to final design), the fencing and boundary treatment and a commitment in respect of resolving any drainage issues created. The only outstanding matter is the amount of financial compensation.

National Grid – The rights required over land owned by National Grid are incorporated into the wider protective provision and commercial agreement discussions ongoing with National Grid.

Q2.6.8	Preston Farms Limited tenancy Action point 28 from issue specific hearing 1 [EV7-018] asked the applicant to “To provide submissions on the Preston Farms Limited’s tenancy position and its relevance to the Secretary of State’s decision making.” For deadline 4. The applicant is asked to provide precise detail of how long the land has been occupied by the tenant, and when the Notice to Quit was served and on which parties?	Please see the Applicant’s detailed note on the Tenancy Position of Preston Farms Ltd [EN010158/APP/8.30] submitted at Deadline 4.
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Table 2-7.1: Cultural Heritage

ExQ2 Ref	Question	Applicant’s Response
Q2.7.1	Archaeological Desk-Based Assessment and Setting Assessment Did the applicant undertake site visits to each of the listed buildings included in the detailed settings assessment [REP2-046] in order to inform its conclusions? If not, why not?	Site visits were undertaken from publicly accessible areas (in line with standard industry practice) for all listed buildings included within the detailed settings assessment. Where listed buildings were not visible from publicly accessible areas, the assessment has been based on an understanding of the listed building and its setting based on desk-based information comprising as relevant: descriptions of heritage assets in the Historic Environment Record, satellite imagery, current and superseded OS mapping, other historic maps, plans and photographs held in the local archives, and the ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] [APP-117] [APP-118] [REP1-050] [REP1-051] [REP1-052] [REP1-053] [REP1-054] [REP1-055] [REP2-052] .
Q2.7.2	Claydon House The statement of common ground (SoCG) between the applicant and Historic England [REP2-018] at reference 2.1 in table 2 states that Historic England concurs with the	The Applicant can confirm that this a typographical error in the Statement of Common Ground and should have read “the lower end of less than substantial harm”. The error has been corrected and an updated final Statement of Common Ground with Historic England [EN010158/APP/5.16.3] has been submitted at Deadline 4.

assessment of heritage assets including that the impact on Claydon House is at “the lower end of substantial.” Is this the position agreed between the two parties or a typographical error? Update the SoCG, if appropriate.

Q2.7.3

Bernwood Farm

Buckinghamshire Council has requested that the applicant provide a cultural heritage assessment of Bernwood Farm which it considers to be a non-designated heritage asset. In addition, the applicant's response to Buckinghamshire Council's request for further mitigation for Bernwood Farm as summarised in the SoCG [\[REP2-024\]](#) refers to its consideration in the Residential Visual Amenity Assessment (RVAA) which confirms an offset of 180 metres from the property.

1. Does the applicant intend to provide an assessment of Bernwood Farm? If not, why not? If so, when will it be submitted into the examination?

The applicant is invited to comment further on the extent to which findings of the RVAA have informed its conclusions on the suitability of cultural heritage mitigation.

The Applicant has discussed Bernwood Farm with Buckinghamshire Council who have agreed that the effects would not be significant. A detailed setting assessment has been included in the update to Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.3]** submitted at Deadline 4. This has concluded that the harm to significance would be at the middle of the scale of less than substantial, the impact would be moderate, and the effect would be slight and not significant. It is understood that Buckinghamshire Council consider that the harm is greater but would still constitute less than substantial harm. This is set out within the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.4]** submitted at Deadline 4.

ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114] uses a different assessment methodology to that of the cultural heritage assessment. The Applicant acknowledges that the RVAA concludes a significant effect on Bernwood Farm in terms of residential amenity due to the visibility of Solar PV modules from the upper floors, and because **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** assigns high sensitivity to all residential receptors. The effect on its cultural heritage significance is detailed within the update to Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.3]** submitted at Deadline 4. The impact on the significance of this asset is considered to be moderate, resulting in an effect on this asset of low importance of slight significance and not significant. The difference in significance of effect between the RVAA and the cultural heritage assessment results from the relative weight given to the low importance non-designated heritage asset (the building as a receptor) compared to same location as a residential property (the residents as receptors).

Q2.7.4

Botolph House

1. Should the multiple references to “Grade II” Botolph House in Environmental Statement (ES) Chapter 9 [\[REP2-027\]](#) refer to Grade II* as per the Archaeological Desk-Based Assessment and Settings Assessment [\[REP2-046\]](#)? If so, update ES Chapter 9 accordingly.

Provide a detailed response to Buckinghamshire Council's response to action point 20 from issue specific hearing 1 [\[REP3-055\]](#) regarding the applicant's assessment of Botolph House. The Council considers that its architecture has not been considered in sufficient detail, to identify the contribution of setting to its significance.

Reference to Botolph House as Grade II listed within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.3]** is a typological error and has been amended to Grade II* in the version submitted for Deadline 4.

Buckinghamshire Council considers that the harm to Botolph House is at the middle of the scale of less than substantial harm as the classical house architecture would have had the principal rooms on the first floor, and there would have been an intent for the house to dominate Botyl Road and the countryside below to the east and to the rear. The Applicant considers that the later vegetation planting along Botyl Road, whilst not part of the original design of the setting of the house, reduces the contribution that views out from the house to the east and longer range views of the house from the east make to its significance. Any views from the northernmost first floor rooms over the valley into Fields E21, E22, and E23 already include the existing National Grid East Claydon Substation and are not unaltered. Whilst the Proposed Development would introduce a new substation, BESS and Solar PV modules into this view, there would still be views over the valley towards Quainton Hill and this element of setting (historically available views over the valley and views back towards Botolph House from the east where it was historically visually dominant) will be slightly diminished. The house will remain dominant on Botyl Road (where the vegetation does not screen it from view) and the Applicant concludes that there will be a low level of less than substantial harm to its significance as a result of the changes within its setting slightly compromising its significance. This would result in a slight adverse effect which would not be significant.

Q2.7.6

Interpretation boards

The Applicant has committed to interpretation boards for Claydon House and Claydon Registered Park and Garden on the proposed permissive path to Knowl Hill to better reveal the significance of the assets and improve

Provide an update on any discussions that have taken place regarding the provision of interpretation boards for built heritage and the historic landscape.

appreciation and understanding of it in accordance with NPS EN-1 [Ref. 9-10], as detailed in the **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.5]** and secured by the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.5] [CR1-026]** and **Outline LEMP [EN010158/APP/7.6.5]**. The Applicant has discussed the provision of possible additional interpretation boards further with Buckinghamshire Council. The Applicant understands that Buckinghamshire Council would like to see interpretation measures within Botolph Claydon and East Claydon. These areas lie outside the Applicant's control and the Applicant is therefore unable to commit to delivering interpretation boards in these locations. It has been agreed with Buckinghamshire Council that the **Outline LEMP [EN010158/APP/7.6.5]** and a DCO Requirement to agree a detailed Landscape and Ecological Management Plan with Buckinghamshire Council provide an appropriate mechanism by which to secure agreement post-DCO consent on the location, content and ongoing maintenance of interpretation boards within the Order Limits. This agreement is detailed in the **Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.4]** submitted at Deadline 4.

Table 2-8.1: Cumulative Effects

ExQ2 Ref	Question	Applicant's Response
Q2.8.1	Environmental Statement (ES) Chapter 17 (Cumulative effects) – assessment methodology Explain your approach to keeping tier 3 projects under review throughout the examination and including them in the assessment if sufficient information becomes available publicly. Provide a list of all tier 3 projects identified up to this point in the examination and highlight those that you have progressed to assessment.	The Applicant is keeping tier 3 projects under review to ensure that, if they progress and sufficient information is made publicly available which would mean they then meet the criteria set out in the methodology, they are captured in the next update of ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037] either on the long-list or short-list as required. The only tier 3 project identified up to this point in the examination is the National Grid East Claydon Substation which has been assessed in Section 17.6 of ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037]. This scheme does not meet the criteria set out in the methodology however, the Applicant exercised professional judgement in that it should be assessed cumulatively due to the proximity and reliance on this development.
Q2.8.3	ES Chapter 17 (Cumulative effects) – assessment methodology In response to the ExA's written question 1.11.9 [REP2-087] you provided an explanation of how significant intra-project effects were considered alongside significant effects already identified from individual ES topic areas. Please provide a step by step explanation of the approach illustrated by an actual example.	In ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037] the Applicant has undertaken the intra-project combined assessment by firstly identifying each receptor/receptor group assessed in the individual ES environmental factor/topic chapters (step 1). The Applicant has then cross-referenced each receptor/receptor group to understand which receptors/receptor groups will be potentially impacted by more than one environmental factor/topic (step 2). Where the Applicant has identified that a receptor/receptor group is potentially impacted by more than one environmental factor/topic, that receptor/receptor group has been subject to further assessment (step 3). Some receptors/receptor groups taken forward to further assessment (step 3) have an individual effect upon them that has been considered significant in one of more of the environmental factor/topic chapters. In such instances, the intra-project combined effect has also been considered significant, as any additional not significant effects upon that receptor/receptor group would not reduce/nullify the identified significant effect. For example, public rights of way (PRoW) in and around the Order Limits (excluding Swan's Way/Outer Aylesbury Ring) is a common receptor for Air Quality, Landscape and Visual, Noise and Vibration, Population, and Transport and Access. Landscape and Visual has been deemed the 'Lead' factor, as the assessment in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.3] takes into account the potential effects of the other environmental factors/topics upon this common receptor (e.g. noise, air quality and movement in the perception of visual amenity) and therefore provides an integrated assessment of the effect significance upon PRoW.

	Conversely, some receptors/receptor groups taken forward to further assessment (step 3) have individual effects upon them that have all been considered not significant in one or more of the environmental factor/topic chapters. Where this is the case, professional judgement was used in the absence of guidance, to determine if multiple not significant effects would combine to create a materially greater effect or not by use of a 'Lead' factor. For example, Botolph Claydon (including the Conservation Area) is a common receptor in respect to Air Quality, Cultural Heritage, Landscape and Visual, Noise and Vibration, and Population. Population has been deemed the 'Lead' factor, as the assessment in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4] takes into account the potential effects from the other environmental factor/topics upon this common receptor (e.g. amenity, setting, wellbeing) and therefore provides an integrated assessment of the effect significance upon Botolph Claydon (including the Conservation Area) which was concluded as a not significant intra project combined effect. It would not be appropriate for the Applicant to apply a 'matrix' to determine the significance of an intra-project combined effect upon a common receptor/receptor group. There is no established or widely accepted methodology for quantitatively aggregating multiple not significant effects across different environmental factors/topics into a single significance outcome and these have to be considered on a case by case basis.
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Table 2-9.1: The draft Development Consent Order (dDCO)

ExQ2 Ref	Question	Applicant's Response
9.1 Articles		
Q2.9.13	Article 14. Use of private streets At issue specific hearing 2 (ISH2), the Examining Authority noted that article 14 would confer wide powers over private roads within the Order limits. The ExA queried whether this power should instead be restricted to those roads specifically identified in the application documents. In relation to this the applicant agreed action point 6, [EV8-004] "to update streets, access and rights of way plans to show existing private roads" now confirmed to be actioned at deadline 4, 22 June. Please update the streets, access and rights of way plans to show only those private roads that it is proposed would be used for the project.	The Applicant has submitted an updated version of the Streets, Rights of Way and Access Plans [EN010158/APP/2.4.5] at Deadline 4 to show existing private roads within the Order Limits.
Q2.9.15	Article 20. Authority to survey and investigate the land A 28 day rather than 14 day notice period (article 20(2)) for entry onto land is considered to be more reasonable by the Examining Authority (ExA), particularly for access to land subject to complex and often time critical farming or business operations which may well need to be re-arranged to accommodate survey/investigation activities. In addition, the ExA considers it would be helpful to the landowner if at the same time as notice was served	The Applicant does not intend to update Article 21 in the Draft DCO [EN010158/APP/3.1.7] to include a 28-day notice period for entry onto land or to include a requirement that approximate timings and a location plan for the proposed activities must be provided to the landowner at the time that notice of proposed entry is served. These changes do not accord with the strong precedent set in various recent made DCOs for solar farm developments including the Springwell Solar Farm Order 2026, the Fenwick Solar Farm Order 2026, the East Yorkshire Solar Farm Order 2025, the Cottam Solar Project Order 2024 and the Gate Burton Energy Park Order 2024.

approximate timings and a location plan for the proposed activities were provided.

Is the applicant content to amend the article? If not provide your reasons.

The corresponding Articles in the various recent made DCOs listed above do not require the provision of the additional information requested and only require 14 days' notice to enter land. This 14-day timeframe accords with the single codified position of powers of entry within the Housing and Planning Act 2016.

The Applicant notes that the majority of made DCOs listed above are in respect of projects that are located on predominantly agricultural fields so Applicant considers that it would not be reasonable or appropriate to depart from this precedent for the Proposed Development.

9.2 Schedule 2 - Requirements

Q2.9.18

General

The proposed development is intended to connect to the proposed National Grid East Claydon substation. Is a further requirement preventing any authorised development including any preliminary works commencing until planning permission has been granted for the proposed substation?

The Applicant considers that a DCO requirement which prevents any authorised development (including any preliminary works) from commencing until planning permission has been granted for the proposed National Grid East Claydon Substation would be inappropriate because it fails the relevant policy tests.

The Overarching National Policy Statement for Energy (2023) (**NPS EN-1**) states that the Secretary of State:

- should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects (see paragraph [4.1.16]); and
- should consider the guidance in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance: Use of Planning Conditions where appropriate (see paragraph [4.1.17]).

The relevant guidance in the NPPF provides at paragraph [58] that planning obligations should only be sought where the obligations are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

The Planning Practice Guidance: Use of Planning Conditions confirms that the tests for the use of conditions (i.e. that a requirement is necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects) should be rigorously applied and any proposed condition that fails to meet one of the tests should not be used (see paragraphs [018] – [019]).

The Applicant consider that the proposed 'phasing' requirement fails these policy tests on the basis that the condition / requirement is not necessary and is unreasonable:

- Paragraph [4.11.8] of NPS EN-1 anticipates and allows for the circumstance in which "it may not be possible to coordinate applications" for an energy generating asset (i.e. the Proposed Development) and the connection asset (i.e. the National Grid East Claydon Substation). In compliance with these paragraphs [4.11.8] and [4.11.9], the Applicant has provided sufficient information about the National Grid East Claydon Substation in **ES Volume 2, Chapter 17: Cumulative Effects [EN01058/APP/6.2.3] [REP2-037]**. Further, there is no obvious reason why planning permission for the National Grid East Claydon Substation would not be granted.
- The Applicant currently has a grid connection agreement with NESO to import 500MW (AC) and export 500MW (AC) of clean power to the National Electricity Transmission System. The Applicant has recently requested a reduction to these capacities and is seeking to decrease the import to 335MW (AC) and the export to 335MW (AC). NESO has identified the National Grid East Claydon Substation as the point of connection and, as the system operator, NESO is under certain obligations to deliver on the grid connection under the agreement in place.

- The Applicant is not aware of any precedent for the imposition of a requirement of this sort and considers that there is no basis to treat the Proposed Development as 'exceptional' such that a requirement of this type would be justified here.
- It is unreasonable to require the Applicant to wait until the proposed requirement can be discharged because this would create a significant delay to the construction of the Proposed Development making its delivery by 2031 unachievable.
- Practically, the Applicant also has a series of decisions to make when preparing for construction post-consent including engaging with the supply chain and placing orders that would be adversely affected if it could not rely on its DCO to enable implementation to proceed without the proposed restriction. This is likely to delay the implementation of urgently needed critical national priority renewable energy infrastructure and/or hamper its delivery.
- The precedent effect of a decision to impose a condition of this type could also have wider consequences for the rapid delivery of solar energy and the ability of the sector to meet the urgent need for increased generating capacity set out in the NPSs.
- There are many precedents for generating stations being consented at a point when the associated grid connection project was further back in the consenting process. This includes the recently consented Springwell Solar Farm Order 2026, the Five Estuaries Offshore Wind Farm 2025 and the North Falls Offshore Wind Farm Order 2026 where development consent was granted for those projects before consent was granted for the related connection project. A similar phasing requirement was considered for all of these projects and the Secretary of State found no reason to impose such a requirement.

Accordingly, the Applicant submits that there is no justification to adopt the proposed DCO requirement.

9.3 Protective Provisions (PPs)

Q2.9.22

Progress reaching agreement

At deadline 3 you submitted Status of Negotiations with Statutory Undertakers [\[REP3-046\]](#) which indicates that draft PPs and the associated draft commercial agreement with National Grid Electricity Transmission Limited are close to agreement.

Please outline the outstanding issues to be agreed in both documents.

The Applicant stated in **Status of Negotiations with Statutory Undertakers** [\[EN010158/APP/8.9.3\]](#) [\[REP3-046\]](#) that the parties are close to agreement on the protective provisions and that NGET had provided a first draft of the commercial agreement on 19 May 2026. The Applicant is currently reviewing the draft commercial agreement and is confident that it will be agreed before the end of examination but anticipates that further negotiation between the parties is required.

The Applicant has set out below a description of outstanding issues in relation to both documents.

Protective provisions

The Applicant is currently reviewing an updated version of the protective provisions provided by NGET.

The protective provisions govern, amongst other things, the interface between the Proposed Development and NGET's East Claydon Project and the construction of grid connection works as part of the Proposed Development.

The final outstanding issues that the parties are negotiating relate to the definition of the area deemed to be the "East Claydon Site" and the definition of what constitutes "grid connection works" for the purposes of the above.

Commercial agreement

The related agreement contains terms of a commercial nature that are confidential between the parties. However, the Applicant confirms that it will finalise and issue its comments on the draft commercial agreement which broadly relate to covenants of both parties under the agreement and co-ordination and co-operation by the parties in respect of the interface between the East Claydon Project and the Proposed Development.

Q2.9.24	Progress reaching agreement At deadline 3 you submitted Status of Negotiations with Statutory Undertakers [REP3-046] which indicates that a draft interface agreement with Statkraft UK Limited is close to agreement. Please outline the outstanding issues to be agreed and why you are confident the interface agreement can be agreed before the end of the examination.	The Applicant stated in Status of Negotiations with Statutory Undertakers [EN010158/APP/8.9.3] [REP3-046] that Statkraft had issued a draft Interface Agreement to the Applicant which the Applicant is currently reviewing and that the Applicant is confident that the Interface Agreement will be agreed before the end of examination. The Applicant is currently confirming the extent and nature of the overlap between the red line boundaries of the Proposed Development and the East Claydon Greener Grid Park project with Statkraft. That will inform the Applicant's comments on the draft Interface Agreement. The Interface Agreement contains terms of a commercial nature that are confidential between the parties. However, the Applicant confirms that it will finalise and issue its comments on the draft Interface Agreement which broadly relate to the mechanisms proposed within the agreement to ensure co-operation between the parties and the smooth co-existence of the relevant projects including construction programming, planning matters and land rights issues. The Applicant remains confident that the Interface Agreement will be agreed before the end of examination.
Q2.9.25	Progress reaching agreement At deadline 3 you submitted Status of Negotiations with Statutory Undertakers [REP3-046] which indicates that draft PPs with Thames Water Utilities Limited are close to agreement. Please outline the outstanding issues to be agreed.	The Applicant is currently reviewing the comments that Thames Water Utilities Limited (TWUL) provided in respect of the protective provisions. The number of outstanding issues between the parties has significantly reduced. The last remaining points for negotiation relate to offsets for piling works from TWUL assets and obligations with respect to third party claims in the event of damage to apparatus caused during the construction of the relevant works. The Applicant remains confident that the protective provisions will be agreed before the end of examination.

Table 2-10.1: Health and Wellbeing

ExQ2 Ref	Question	Applicant's Response
Q2.10.1	Health Effects Report How do you respond to Buckinghamshire Council's concern, expressed in its response to the Examining Authority's (ExA) written question 1.13.1 [REP2-090] , that while Annex A of Environmental Statement (ES) Appendix 5.5: Health and Well Being Summary Statement [REP2-050] improves clarity of health assessment reporting, the presentation of the assessment as an Annex to an Appendix within the ES fails to afford the assessment equivalent prominence within the ES as other topics that also feature as named topics in the relevant Environmental Impact Assessment legislation?	The Applicant considers that as an Appendix to the ES, ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] and the Health Effects Report at Annex A are both certified documents that have according weight alongside other elements of the Environmental Statement including the 'stand alone' chapters. The approach taken has been in accordance with the Scoping Report (ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]). The Planning Inspectorate agreed that human health could be scoped out of the ES (ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080], p18) on the basis that the ES should still clearly set out potential impacts to human health from the Proposed Development and cross-reference where impacts are considered and assessed within other relevant chapters of the ES, with any relevant mitigation measures secured within the Outline CEMP [EN010158/APP/7.2.5]. Consideration of health impacts is incorporated into assessments of air quality, landscape & visual, noise & vibration, population, traffic & transport, land & groundwater, water and glint & glare within the relevant Environmental Statement topic chapters and assessments as appropriate, as well as ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]. The Applicant has considered whether it is beneficial to include a short statement in individual sections of the Non-Technical Summary (NTS) (or a new stand-alone chapter of the NTS) but is generally of the view that the purpose of the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] is to address

the health implications of the assessments considered by the ES chapters, which have not changed. The individual NTS chapters for each topic therefore remain as produced to-date.

Q2.10.2

Health assessment - landscape related and cumulative wellbeing effects and geographically sensitive sub-populations

In its response to the ExA's written question 1.13.1 [\[REP2-050\]](#) Buckinghamshire Council highlighted three inter-related matters that it considers persist as significant adverse residual effects (i.e. after mitigation), which it wishes the applicant to explore further through robust assessment:

- Landscape and visual change, including cumulatively
- Effects on public rights of way
- Insufficient focus on high-exposure geographical sub-populations as specific receptor groups for health and well-being effects

Do you intend assessing these effects further? If not, why not?

The Applicant is content that the assessment provided within **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** is proportionate and in-line with ISEP guidance on assessment of health determinants at an appropriate scale.

Notwithstanding this, the Applicant has provided a response to residual issues raised by Buckinghamshire Council within its **Response to Deadline 3 Submissions [EN010158/APP/8.22]**, submitted at Deadline 4, and has provided some contextual amendments to **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** also submitted at Deadline 4.

These amendments do not represent further, additional assessment, which the Applicant does not consider is necessary, but are intended to make more explicit the approach and findings of the assessment, and to clearly set out the approach to linking receptor identification to effects and then to bespoke mitigation. This does not change the assessment of significance concluded by **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]**.

In terms of landscape and visual change, including cumulatively (not including effects on PRoW which are considered below):

- It is acknowledged in **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** that some residential receptors are likely to experience significant landscape and visual effects, and that landscape and visual amenity is a factor that can be influential in determining mental health and wellbeing.
- It is also acknowledged that sensitivity of sub-populations to such change differs depending on demographic and socio-economic characteristics – and the geographical population more likely to be affected by the significant effects of the Proposed Development are more likely to have such sensitivities given the characteristics of the sub-populations reported in **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]**.
- A detailed assessment of residual (following mitigation) landscape and visual effects is reported in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.3]**, whilst residual cumulative effects are assessed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** [\[REP2-037\]](#) and **ES Volume 4, Appendix 17.2: Landscape and Visual Inter-project Cumulative Effect Assessment [EN010158/APP/6.4.3]** [\[REP2-057\]](#). The Applicant does not, therefore, consider further assessment necessary.

In terms of effects on public rights of way (affected in terms of landscape and visual effects only):

- It is acknowledged in **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** that users of some PRoW are likely to experience significant landscape and visual effects, and that users of these PRoW may be more likely to be residents of areas close to these PRoW who rely on them for physical recreation, community connectivity and access to nature (which is a determinant of mental health and wellbeing).
- The sensitivity of sub-populations to such change differs depending on demographic and socio-economic characteristics – and the geographical population more likely to be affected by the significant effects of the Proposed Development are more likely to have such sensitivities given the characteristics of the sub-populations reported in **Annex A (Health Effects Report)** of **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]**.

- Mitigation has been developed that is mindful of the landscape and visual amenity of the specific PRow affected - including bespoke offsets to routes as set out in Q1.17.3 of **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**.
- For landscape and visual amenity effects on health and wellbeing for users of PRow, it is not clear how bespoke mitigation can be achieved that responds specifically to the experience of sub-populations that may be more acutely affected by the changes, beyond mitigation that would address these effects for all people. Bespoke, embedded design mitigation has been developed for the specific groups of PRow that are more likely to be affected by the Proposed Development, and more likely to be used by people living in close proximity to them. As set out in the **Design Approach Document [EN010158/APP/5.8.3] [CR1-014]**, these include:
 - Removing Solar PV development to reduce the impact on the landscape character and to retain views towards Quainton Hill and its landscape context from the Bernwood Jubilee Way; and
 - Committing to providing bespoke mitigation including large offsets to PRowS that coincide with the Bernwood Jubilee Way, Mid Shires Way and North Bucks Way within the **Design Commitments [EN010158/APP/5.8.6]** (see design commitments F4 and F5 in particular).
- The **Outline LEMP [EN010158/APP/7.6.5]** and **Outline RoWAS [EN010158/APP/7.8.5] [CR1-026]** secure important enhancement measures relevant to positive health pathways, including the provision of new permissive footpaths and increased accessibility, opportunities for recreation in the natural environment, and environmental improvements.
- Importantly, the Applicant has committed to consult with the Community Liaison Group (CLG) on relevant points of interest during the detailed design stage, prior to the submission and approval of the detailed design in accordance with Requirement 7 of the **Draft DCO [EN010158/APP/3.1.7]**.
- This could include, for example, the location and content of interpretation boards and waymarking signage and the options for planting alongside PRow and permissive paths, as appropriate – this enables a community-led, effect and geographical receptor-based approach to be adopted to develop and direct mitigation to those locations for the people likely to be affected the most.

In terms of high-exposure geographical sub-populations:

- It is acknowledged in **Annex A (Health Effects Report) of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** that some geographically-specific receptors are likely to experience more acute effects as a result of environmental change related to the Proposed Development – this is clear from the topic-specific assessments that feed into the reporting of health effects. Principally, this identifies that some residential receptors and users of local PRow are likely to experience significant landscape and visual effects.
- These effects contribute to wider determinants of health – **Annex A (Health Effects Report) of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]** acknowledges this, and further recognises that sub-populations that are prevalent in the area may experience these effects more acutely.
- The Applicant does not consider it proportionate or accurate to suggest that the individual geographical receptors (e.g. residential properties) should be combined with the characteristics of the sub-populations (i.e. assuming the residents of individual properties have sub-population characteristics), and as set out in response to Q1.13.2 in the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]**, ISEP guidance does not recommend that such assessments on individual receptors are made.
- Nonetheless, the approach taken to the assessment considers that such effects *may* occur, and the narrative sets out that these effects are potentially significant.

	• The approach to mitigation for landscape and visual amenity (and other environmental aspects) takes into account the effects on specific receptors and includes a combination of project-wide standards and practices, as well as location and receptor-specific measures in terms of design and additional mitigation to address these effects – this has been made more explicit in an updated version of the Annex A (Health Effects Report) of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] submitted at Deadline 4. • Such measures are generally not necessarily designed with sub-populations and their individual sensitive characteristics in mind, but apply equally to populations and sub-populations. The mitigation does include the ability for further, detailed, bespoke measures that could be tailored to the specific sub-populations in communities more acutely affected, likely to use specific PRow, or who live in certain locations. • The key vehicle for this is the CLG - the Applicant has committed to consult with the CLG on relevant points of interest during the detailed design stage, prior to the submission and approval of the detailed design in accordance with Requirement 7 of the Draft DCO [EN010158/APP/3.1.7].
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Table 2-11.1: Landscape and visual (including good design)

ExQ2 Ref	Question	Applicant's Response
Q2.12.2	Moderate (not significant) effects At issue specific hearing 1 (ISH1) [REP3-049], the applicant stated that only a limited number of receptors (two settlements and 12 residential receptors) were identified as moderate, but not significant. Provide a summary table that identifies all receptors where a conclusion of moderate adverse effects has been reached by the applicant. This should clearly identify whether the effects are deemed to be significant or not significant by the applicant.	The Applicant was quoting from reference Q1.15.13 in Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] which states that, <i>"Long-term effects judged as moderate and not significant are noted for two settlements and twelve residential receptors. With the exception of LCA 9.2: Quainton Hill, all other long-term moderate effects, as assessed for LCT/LCA, PRow, trails and visitor attractions are judged as significant."</i> The table below provides a summary of the relevant moderate effects as set out in Table 10.14 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.3]. The year 10 effects noted below correspond to long-term effects.

Receptor	Phase	Sensitivity of the receptor	Magnitude of effect	Residual effect (with additional mitigation)
Landscape fabric (woodland, trees and hedgerows)	Operation (Year 1)	High/medium	Slight	Moderate adverse Not significant
	Operation (Year 10)	High/medium	Moderate/slight	Moderate beneficial Significant
LCA 5.7: Hogshaw Claylands	Operation (Year 1)	Medium/low	Substantial/moderate	Moderate adverse Significant
LCA 7.3: Claydon Bowl	Operation (Year 10)	Medium/low	Substantial/moderate	Moderate adverse Significant
	Operation (Year 1)	Medium	Substantial/moderate	Moderate adverse Significant
LCA 9.2: Quanton Hill	Operation (Year 10)	Medium	Substantial/moderate	Moderate adverse Significant
	Operation (Year 1)	Medium	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	Medium	Moderate/slight	Moderate adverse Not significant
1-2 Calvert Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight	Moderate adverse Not significant
3 Calvert Cottage	Operation (Year 1)	High	Slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant
4-5 Calvert Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight	Moderate adverse Not significant
Granary Cottage	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant

Pond Farm	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight	Moderate adverse Not significant
The Old Dairy	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant
Knowlhill Farm	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight	Moderate adverse Not significant
1-2 Blackmorehill Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant
4-5 Catherine Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Significant
	Operation (Year 10)	High	Slight	Moderate adverse Not significant
6-7 Catherine Cottages	Operation (Year 1)	High	Substantial/moderate	Major/moderate adverse Significant
	Operation (Year 10)	High	Moderate/slight	Moderate adverse Not significant
Bernwood Farm	Operation (Year 1)	High	Substantial/moderate	Major/moderate adverse Significant
	Operation (Year 10)	High	Substantial/moderate	Major/moderate adverse Significant
Station House	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant
Botolph Claydon	Operation (Year 10)	High	Moderate/slight	Moderate adverse Not significant
	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant
	Operation (Year 10)	High/medium	Slight	Moderate adverse Not significant
	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant
Granborough	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant

Quainton Road/Claydon Road	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Not significant
	Operation (Year 1)	Medium	Moderate	Moderate adverse Not significant
North Buckinghamshire Way/Midshires Way	Operation (Year 10)	Medium	Slight/negligible	Minor adverse Not significant
	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant
Swan's Way/Outer Aylesbury Ring	Operation (Year 10)	High/medium	Slight	Moderate/minor adverse Not significant
	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant
Three Points Lane and the PRow extending to HS2	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant
	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant
PRow, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3	Operation (Year 10)	High/medium	Slight	Moderate/minor adverse Not significant
	Operation (Year 1)	High/medium	Moderate	Major/moderate adverse Significant
Claydon House	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant
Hogshaw Farm and Wildlife Park	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant
	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant
	Operation (Year 1)	High/medium	Moderate	Moderate adverse Significant
	Operation (Year 10)	High/medium	Moderate	Moderate adverse Significant

Q2.12.3

Assessment of effects

Provide examples of other Nationally Significant Infrastructure Projects that have been approved by the Secretary of State that adopted the same or similar approach to arrive at conclusions on the significance of effects as the applicant, including the use of a three-point scale to determine sensitivity and a four-point scale for magnitude. Explain why any such cases are applicable to the Rosefield Solar Farm project.

Both the consented Byers Gill Solar DCO (Reference: EN010139, consented 23 July 2025) and Springwell Solar DCO (Reference: EN010149, consented 8 April 2026) used the same methodology as the Proposed Development with a three-point scale to determine sensitivity and four-point scale for magnitude. The methodology has been developed over a number of years of professional practice and has been used for a large number of LVIAs over a wide array of project types, including renewable energy of various scales (large scale wind, solar, BESS, energy from waste), residential, minerals, commercial and industrial projects. The same methodology has been used for LVIA submission in numerous projects at Public Inquiries and Hearings. The Applicant therefore submits that this same methodology is equally applicable for use on the Proposed Development.

Q2.12.4

Fields D28 and D29

To the applicant:

1. Confirm which landscape and visual viewpoints the applicant considers that there would be intervisibility with the proposed development in fields D28 and D29 in years 1 and 10.

To Buckinghamshire Council:

2. The Council is invited to elaborate on its position as stated in ISH1 [\[REP3-056\]](#) that there were medium or medium-to-long distance views of fields D28 and D29 when traversing the area by public rights of way and that the development would be noticeable even with mitigation.

As shown in **ES Volume 4, Appendix 10.6: LVIA Visualisations** [\[EN010158/APP/6.4\]](#) [\[APP-115\]](#) [\[APP-116\]](#) the viewpoints from which there would be intervisibility are:

- Viewpoints 15 and 41 located within Field D28;
- Viewpoint 16 located approximately 350m west of Field D29;
- Viewpoints 30 and 31 from Conduit Hill/Quainton Hill located approximately 2.3km and 2.5km to the east of the Site respectively.

The photomontage of Viewpoint 30 in **ES Volume 4, Appendix 10.6: LVIA Visualisations** [\[EN010158/APP/6.4\]](#) [\[APP-117\]](#) provides an illustration as to the extent of solar PV development that would potentially be visible in such views.

Table 2-12.1: Noise and Vibration

ExQ2 Ref	Question	Applicant's Response
Q2.13.1	Background noise The Examining Authority (ExA) notes the continued concern of Buckinghamshire Council regarding the relative increase in noise levels to some receptors due to low background noise levels. The applicant explained at issue specific hearing 1 (ISH1) [REP3-049] that its approach in considering absolute noise levels is appropriate and consistent with other nationally significant infrastructure projects (NSIPs). The applicant also stated that it was not reliant only on the 35 decibel (dB) threshold specified in requirement 14 (operational noise) of the draft Development Consent Order (dDCO) [REP3-006] but that other measures in the outline Operational Environmental Management Plan (oOEMP) [REP3-032] would also manage noise. The oOEMP would be subject to approval by Buckinghamshire Council under requirement 12 of the dDCO. To the applicant: 1. Provide examples of other consented NSIPs that have applied a similar approach in low background noise areas. 2. Provide comments on how the applicant's approach complies with National Planning Policy Framework (NPPF) paragraph 198 which requires applicants to	1. Examples of other consented NSIPs that applied a similar approach due to low background sound levels are presented below: - Springwell Solar Farm [EN010149]; - East Yorkshire Solar Farm [EN010143]; - Tillbridge Solar Project [EN010142]; - Stonestreet Green Solar [EN010135]; - Cottam Solar Project [EN010133]; - West Burton Solar Project [EN010132]; - Gate Burton Energy Park [EN010131]; - Mallard Pass Solar Project [EN010127]; - Heckington Fen Solar Park [EN010123]; and - Longfield Solar Farm [EN010118]. 2. Noise generated by the Proposed Development has been mitigated and potential adverse impacts reduced to a minimum. This has been achieved through the introduction of mitigation measures (embedded and additional), which ensure that the lowest-observed-adverse-effect level (LOAEL) is not exceeded at surrounding residential receptors. Avoiding exceedances of the LOAEL threshold would constitute a situation whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response, in compliance with NPPF paragraph 198. There may be a slight effect on the acoustic character of the area but not such that there is a change in the quality of life. The mitigation measures adopted in the operational phase assessment comprise of:

“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development...”

To Buckinghamshire Council:

3. To what extent would the wider control measures in oOEMP that would be subject to approval by the Council provide assurance that the relative increase in noise from low background levels could be adequately addressed?

- Maximising the separation distances between proposed noise emitting infrastructure and surrounding sensitive receptors.
- Orientating noise emitting equipment to minimise off-site emissions.
- Use of low-noise equipment.
- Introduction of noise barriers around the BESS container areas, Central Inverters and Rosefield Substation.
- Introduction of enclosures and/or barriers around the main transformers within the Rosefield Substation and Satellite Collector Compound.
- Operational phase noise monitoring to demonstrate compliance with specified noise thresholds.

As noted in Section 13.13 of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]**, the operational phase assessment is based on all plant/equipment running at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, when baseline sound levels are lowest, due to darkness and temperature fluctuations resulting in lower cooling demands. The level of noise reduction would be determined once plant/equipment specifications are defined during the detailed design stage. As a result, the difference between the rated noise levels and the typical background sound levels is expected to be lower than those presented.

Q2.13.2

Embedded mitigation - offset

In relation to the proposed 50m offset embedded noise mitigation, the applicant's response to Examining Authority's first written questions (ExQ1) Q1.16.8 [\[REP2-087\]](#) states that “due to the quantity of noise sources and mitigation measures applied, combined with the complexity of noise propagation pathways from multiple sources operating simultaneously, it is not appropriate to specify a fixed offset distance at which components must be sited to ensure adverse impacts would be avoided.” If so, why has the applicant specifically identified an offset of 50m between specific components and residential properties as well as from the southern boundaries of fields D8 and D9 and the eastern boundary of field D9 in the Design Commitments [\[REP3-010\]](#)?

The 50m offset is a minimum separation distance that was used to inform the assessments within the Environmental Statement. Varying offset distances, in conjunction with other mitigation measures, have been adopted in the noise assessment to avoid significant adverse effects. These are secured within the **Works Plans [EN010158/APP/2.3.5]** and **Design Commitments [EN010158/APP/5.9.6]**.

Q2.13.3

Embedded mitigation - use of equipment with low noise emissions

The applicant's response to ExQ1 Q1.16.9 [\[REP2-087\]](#) states that “The selection of equipment will be subject to the design team/contractor responsible for the detailed design of the proposed development. This decision can be balanced with other factors such as equipment size, efficiency, availability and cost...”

1. Would Buckinghamshire Council have any input into the decision not to use equipment with low noise emissions? If not, why not?

1. Use of equipment with low noise emissions where feasible is identified as an embedded mitigation measure within Table 13.12 of **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]**, which was the subject of ExQ1 Q1.16.9. The mitigation measures adopted to achieve the operational noise rating levels set out in the **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.5]** would be subject to review at detailed design stage by Buckinghamshire Council, as stipulated by Schedule 2 of the **Draft DCO [EN010158/APP/3.1.7]**.
2. Based on the design that has been assessed within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]**, the adoption of equipment with low noise emissions is required to achieve the significance criteria adopted for the operational phase assessment and has therefore been included as an embedded mitigation measure. As noted in the ES chapter, it is anticipated that the noise emitting equipment will be refined as part of the detailed design, which may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits. As the design develops, the noise

2. Can the use of equipment with low noise emissions be considered as embedded mitigation if a contractor can discount it based on cost at a later date?

control strategy will also be refined, accounting for equipment with low-noise emission and other measures, as appropriate, sufficient to achieve the adopted acoustic criteria, as secured by Schedule 2 of the **Draft DCO [EN010158/APP/3.1.7]**.

The low noise emissions that have been used to inform the assessment presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3]** are within the range of available product specifications which are technically appropriate for the Proposed Development; it is not reliant on future technological advancements.

Q2.13.4

Public Rights of Way (PRoW) users

Provide a further assessment of noise effects on PRoW users as advocated by Buckinghamshire Council at paragraph 81 of its post ISH1 note [\[REP3-056\]](#) or provide further justification for not doing so.

Within paragraph 81 of Buckinghamshire Council's post ISH1 note [\[REP3-056\]](#), reference is made to the WHO Guidelines for Community Noise, specifically the following requirement for outdoor areas in parkland and conservations areas:

"existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low".

Buckinghamshire Council advise that this requirement should be applied to the operational phase noise assessment for PRoW users. This is contested by the Applicant, on the basis that the PRoW do not constitute either parkland or conservation areas in their own right, nor are they located within any defined parkland or conservation areas. There are no quantitative assessment thresholds for the determination of adverse effects on PRoWs.

Notwithstanding this, the resultant operational phase noise levels experienced by PRoW users have been subject to mitigation, through the adoption of low-noise emitting equipment and perimeter barriers, as secured by **Outline OEMP [EN010158/APP/7.3.5]**.

The baseline ambient sound levels along PRoWs and permissive paths within the Order Limits will be influenced by a variety of sources, which may include, but not be limited to, birds, insects, livestock, wind-blown foliage and occasional aircrafts. On the basis of the residual noise levels generated by the Proposed Development post-mitigation and the acoustic masking effects of existing sound sources, perceptible noise from the Proposed Development during operation would be localised, rather than widespread along the PRoW/permissive path network.

Q2.13.5

Noise and vibration effects on livestock and related mitigation

In the absence of the consideration of horses, sheep and cattle as receptors in the noise assessment detailed in Environmental Statement Chapter 13 [\[REP1-040\]](#) how can the Secretary of State have confidence that the full range of likely significant effects have been identified and that outline mitigation measures identified by the applicant would be effective?

Given the lack of reliable studies which enable the onset of an adverse effect to be linked to a measured noise level for livestock, a range of acoustic mitigation measures have been committed to which are secured by the **Outline CEMP [EN010158/APP/7.2.5]**, **Outline OEMP [EN010158/APP/7.3.5]** and **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.5]** to reduce the noise and vibration levels experienced by livestock. This is in addition to engagement and effective communication between the Applicant, their contractors and Preston Farms Ltd/TCS Biosciences Ltd through all phases of the development to manage potential impacts.

Construction phase mitigation measures that would be considered include:

- Implementation of Best Practicable Means to control noise and vibration levels.
- Use of temporary noise barriers.
- Use of alternative low-noise and low-vibration techniques e.g. rotary bored piling in lieu of percussive.
- Routing of construction traffic to minimise noise levels in surrounding fields.
- Implementation of the British Horse Society recommendations.

A six-month advance notification of the location and timing of any construction activities in proximity to the Preston Farms Ltd grazing land would be provided, so that an effective mitigation strategy can be determined. The aim would be to work with Preston Farms Ltd to establish ways in which livestock can be located away from construction activities, including:

- Undertaking works when livestock are stabled during winter months.
- Temporary use of other areas of land for livestock within the Order Limits during construction away from the works.
- Use of fields closest to construction areas for crop, rather than grazing, thereby maximizing source to receiver separation distances.

The commitment for the Applicant to liaise with Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed Construction Environmental Management Plan(s) and subsequently during the construction phase is secured in Section 2.22 of the **Outline CEMP [EN010158/APP/7.2.5]**.

During the operation (including maintenance) phase, noise emissions will generally be steady-state or gradually increasing/decreasing and therefore are unlikely to cause disturbance to horses and sheep. Notwithstanding this, mitigation measures to reduce operational noise have been introduced to minimise the likelihood of adverse effects. A series of measures have been adopted into the design of the Proposed Development to avoid or reduce the potential stress on animals as far as practicable.

The Applicant will liaise with all agricultural tenants and Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed Operational Environmental Management Plan and subsequently during the operational phase. Measures to be included in the detailed Operational Environmental Management Plan will include providing at least six months advance notification of the location and timing of any maintenance activities in proximity to the agricultural tenants' and the Prestons' grazing land. This is secured in Section 2.15.2 of the **Outline OEMP [EN010158/APP/7.3.5]**.

Within certain parts of the Preston Farms' grazing fields, there is potential that the horses and sheep may currently be exposed to noise levels which exceed the highest predicted operational phase noise levels generated by the Proposed Development e.g. in the vicinity of local road links which bound certain fields, where noise levels of 55-60 dB LAeq,16hr at 10m would be anticipated. Other short-term events will also generate elevated noise levels, such as agricultural works involving noise emitting plant/machinery, aircraft movements and members of the public traversing PROWs.

Table 2-13.1: Population

ExQ2 Ref	Question	Applicant's Response
Q2.14.1	Primary construction compound in field E21, E22 or E23 1. At what stage would the applicant determine whether the primary construction compound in parcel 3 as identified in the Works Plans [REP3-005] and figure 3.8 of Environmental Statement (ES) Chapter 3 Proposed Development Description [REP1-049] would be located in either field E21, E22 or E23? 2. What factors would inform the decision regarding the location of the primary construction compound and would it be subject to consultation with relevant landowners and tenants?	1. Following ISH1 the Applicant can commit to moving the Primary Construction Compound out of Field E23 and instead place it within Fields E22 or E21 to mitigate the potential effect for Preston Farms Ltd. This is shown on the revised ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.5] submitted at Deadline 4. Post consent and when compiling the detailed construction schedule once the details of the final design are known, the Applicant would determine the final extent of where the Construction Compound will be positioned within Fields E22 or E21. 2. The final location of the Construction Compound will be determined within Fields E22 or E21 primarily through consideration of health and safety implications, proximity to flood zones, the best access routes and the position which provides the longest site setup before having to remove and build over the existing compound area. It is likely that most of Field E21 will be used as the Primary Construction Compound for Parcel 3, however this will be confirmed at post-consent stage. This will be discussed with relevant landowners and tenants prior to confirming the location.

3. Aside from the grazing corridor proposed for Field E23 in the Design Commitments [\[REP3-010\]](#), what other mitigation measures are proposed to address the potential effects of the compound on the use of field E23 by Preston Farms Limited? In answering this question, have regard to the additional information provided at deadline 3 by Preston Farms Limited regarding its use of field E23 [\[REP3-067\]](#).

3. As confirmed in the response to Point 1 above, the Applicant can commit to removing Field E23 from the Primary Construction Compound siting zone. Furthermore, the **Preliminary Biosecurity Note** [\[EN010158/APP/8.28\]](#) (which has been prepared in response to the additional biosecurity details provided by Preston Farms Ltd and TCS Biosciences Ltd at Deadline 3 [\[REP3-067\]](#)) sets out the approach to biosecurity throughout the construction phase. Site Access Procedures would be in place to ensure biosecurity protocols are followed, enforcement of these measures would be a contractual obligation with site contractors.

Q2.14.2

Knowl Hill Farm – layout of the proposed development

Provide further explanation and justification of the proposed layout of the proposed development in the vicinity of Knowl Hill Farm having regard to matters raised in Mr Claridge's deadline 3 submission [\[REP3-069\]](#). The Examining Authority (ExA) notes that the applicant's response to issue specific hearing 1 (ISH1) action point 31 on this matter [\[REP3-049\]](#) reiterates its position that the layout and use of fields B18 and B19 was informed by the Residential Visual Amenity Assessment [\[APP-114\]](#). Did the applicant also consider the implications for farming operations in determining the layout? If so, identify where this is referenced in the examination library. If not, why not?

The Applicant has provided a full response to Action Point 31 in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1)** [\[EN010158/APP/8.16\]](#) [\[REP3-049\]](#) to clarify the design reasons underlying the proposed layout in Fields B18 and B19.

The Applicant has set out in the **Written Summary of Applicant's Oral Submissions at the Compulsory Acquisition Hearing 1 (CAH1)** [\[EN010158/APP/8.7\]](#) [\[REP1-107\]](#) how implications for the Claridges' farming operations were considered in the design of the Proposed Development, this includes the following:

- The Applicant has included an indicative track across plots 3/11, 3/13, 3/14, 3/15, 3/16, 3/18,4/1 and 4/2 which can be utilised by the Claridge family for farm access purposes to assist with their movements around the farm holding. The final choice of corridor is referenced at paragraphs 5.5.28 and 5.5.29 of the **Design Approach Document** [\[EN010158/APP/5.8.3\]](#) [\[CR1-014\]](#).
- During design stages 1 and 2, a southern cable route and construction access track option located south of Home Wood was considered. However, among the factors taken into consideration when adopting the northern option at Design Stage 3 was the ability to keep construction traffic further from Knowlhill Farm thereby limiting traffic disruption to the Claridge family.
- In order to avoid access to Parcel 1A which would pass through land which will continue to be farmed by the Claridge family, a new access route around Romer Wood (plot 2/7) was included at Design Stage 3, which follows the existing HS2 access route. This removes the need to pass via Knowlhill Farm via plots 2/3 and 2/4 unless necessary for reasons beyond the Applicant's control e.g. the access route through plot 2/7 is obstructed by HS2 works. This is included at paragraph 5.5.31 of the **Design Approach Document** [\[EN010158/APP/5.8.3\]](#) [\[CR1-014\]](#).

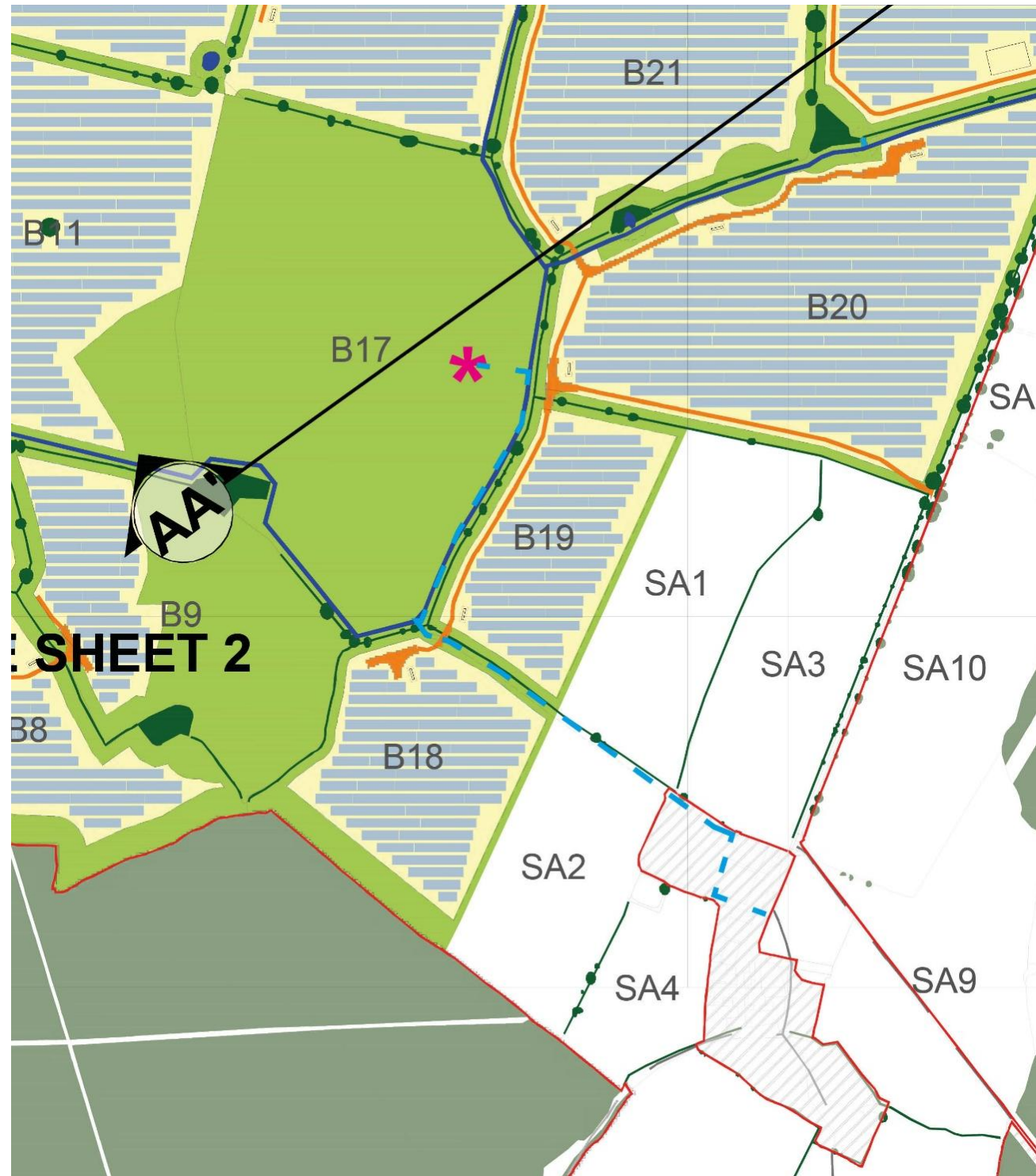
The loss of B18 from agricultural use would be compensated via a land swap agreement for which Heads of Terms have been signed and the solar PV proposed in Field B18 does not restrict the use of adjacent land. As set out in **ES Volume 2, Chapter 14: Population** [\[EN010158/APP/6.2.4\]](#) it is considered that the effects on agricultural businesses and landholders, which includes Mr Claridge's farming operations, would be not significant.

Q2.14.3

Knowl Hill Farm - water supply

Provide a plan that identifies the spring and well referenced in Mr Claridge's deadline 3 submission [\[REP3-069\]](#) as well how access to them would be maintained as indicated in the updated Design Commitments [\[REP3-010\]](#).

The spring and well referred to in Mr Claridge's Deadline 3 submission are located in Field B17. The extract from the **Key Plan of Illustrative Layout Plans and Sections** [\[EN010158/APP/2.6.3\]](#) [\[REP1-007\]](#) below marks the location of the well as a magenta asterisk and the current access route to the well as a cyan dashed line. This plan has been chosen as the base to allow an understanding of how the access route would work alongside the current illustrative layout. The new design commitment G3 added to the **Design Commitments** [\[EN010158/APP/5.9.6\]](#) at Deadline 3 allows for the existing access route from Knowlhill Farm to the well to continue to be used. The route from the yard at Knowlhill Farm into Field B17 was walked during the Accompanied Site Inspection on 19 May 2026.



Q2.14.4

Biosecurity measures during construction

The applicant's response to ISH1 action point 30 [\[REP3-049\]](#) clarifies that there would be a maximum of 200 construction workers at any one time in parcel 3 for a period of around 16 weeks. In comparison, a maximum number of 15 were present during trial trenching works.

A **Preliminary Biosecurity Statement** [\[EN010158/APP/8.28\]](#) in response to the additional biosecurity details provided by Preston Farms Ltd and TCS Biosciences Limited at Deadline 3 [\[REP3-067\]](#) has been submitted at Deadline 4 to provide more information on the Applicant's approach to biosecurity.

As set out in the **Preliminary Biosecurity Statement** [\[EN010158/APP/8.28\]](#), toolbox talks (including training on biosecurity to be developed in consultation with Preston Farms Ltd and TCS Biosciences Limited) would be provided

Provide further details to explain how the necessary biosecurity measures will be effectively communicated and adhered to given the number of unescorted construction workers and period of time that they would be on site. In doing so, have regard to the additional biosecurity details provided by Preston Farms Limited and TCS Biosciences Limited at deadline 3 [\[REP3-067\]](#)

to all construction workers before they could undertake any activities in Parcel 3 and/or the access track leading to Parcel 3.

The Applicant's Site Health and Safety Manager would closely monitor compliance with these measures and would undertake regular spot checks to ensure compliance. Each team leader on-site would also be responsible for monitoring and enforcing biosecurity compliance. The Site Health and Safety Manager would have direct contact with the affected businesses so that any compliance issues would be addressed swiftly. Compliance with the biosecurity requirements would be a contractual obligation for contractors and would be enforced strictly. An engagement protocol involving weekly meetings between the construction team and Preston Farms Ltd and TCS Biosciences Ltd is set out in the **Preliminary Biosecurity Statement [EN010158/APP/8.28]** and **Construction Access Review [EN010158/APP/8.29]** submitted at Deadline 4.

The Applicant's construction and operational vehicle movements would not disturb, cross or block access to the Preston Farms Ltd and TCS Biosciences Ltd silage clamp. Further information on how the construction and operational access to Parcel 3 would work in practice is provided in the **Construction Access Review [EN010158/APP/8.29]**. This includes livestock separation and crossing proposals to prevent cross-contamination between the livestock and vehicles associated with the Proposed Development, with indicative boundary treatments including crossing gates. The **Construction Access Review [EN010158/APP/8.29]** and **Preliminary Biosecurity Statement [EN010158/APP/8.28]** also propose an engagement protocol during construction.

The proposed biosecurity procedures will be developed further prior to construction in a Biosecurity Method Statement to be appended to the detailed Construction Environmental Management Plan once the detailed design and Preston Farms Ltd and TCS Biosciences Ltd grazing regime for the construction period are known. This commitment is secured in the updated **Outline CEMP [EN010158/APP/7.2.5]** submitted at Deadline 4.

EDF power solutions has previous experience of constructing renewable energy projects in areas with biosecurity requirements and livestock grazing and is therefore prepared and equipped to implement the necessary measures.

To further mitigate any risks posed by construction activities, temporary grazing land in Parcel 2 has been offered for the use of Preston Farms Ltd and TCS Biosciences Ltd while construction takes place in Parcel 3, as noted in the **Applicant's Response to Deadline 2 Submissions [REP3-051]** and the **Preliminary Biosecurity Statement [EN010158/APP/8.28]**.

The Applicant has further commented on biosecurity matters at **Ref. 3.15.16** of the **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22]**.

Q2.14.7

Field E23

To the applicant:

1. Provide further details to demonstrate that a grazing corridor (or corridors) would be a workable solution to concerns raised by Preston Farms Limited and TCS Biosciences Limited regarding the safe movement of livestock in the context of details provided in their deadline 3 submission [\[REP3-067\]](#). In particular, provide indicative drawings to show how the minimum corridor width requested by Preston Farms Limited and TCS Biosciences Limited could be accommodated to connect all gateways in field E23 during both the construction/decommissioning phase with a

1. The Applicant has submitted an indicative design of Field E23 allowing for continued animal movement in the **Draft Animal Movement Arc Plan** at Appendix 1 to the **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22]**. The proposed animal movement arc sets aside 47,832m² of land within Field E23 to facilitate continued access for animals between nearby fields. The width of the arc ranges from 30m at the entrances to 170m at the widest point, allowing horses to 'fan out' after they enter the field. Machinery access around the perimeter of the field could still continue outside of the Solar PV fenced area and gaps would be created in the boundary planting to allow continued movement of animals. The detailed design of the animal movement arc, including boundary treatments, would be confirmed prior to construction in consultation with Preston Farms Ltd and TCS Biosciences Ltd.

It is acknowledged that the animal movement routes would differ from the current arrangement as a result of the proposed solar PV in Fields E21/E22 to the north. However, the proposed animal movement arc is considered to be generous and sufficient, given that during the ASI it was observed that there were several outdoor areas for feeding and holding horses on Preston Farms Ltd and TCS Biosciences Ltd premises which were considerably narrower.

potential primary construction/decommissioning compound (Works No. 8A) in situ and during the operational phase with solar photovoltaic (PV) development (Works No. 1 and Works No. 2).

To the applicant, Buckinghamshire Council, Preston Farms Limited and TCS Biosciences Limited:

2. Do the potential benefits including of field E23 in Work No. 1 and Work No. 2 [\[REP3-005\]](#) such as the estimated 12.25 megawatt peak (MWp) generating capacity as cited by the applicant in response to ISH1 action point 32 [\[REP3-049\]](#) outweigh potential adverse effects? Provide reasoning having regard to relevant policy.

Alternatively, if the proposed arc is not deemed sufficient for the animals to move between fields, Preston Farms Ltd and TCS Biosciences Ltd occupy contiguous fields in all directions which the animals could move through instead, with amendments to the current grazing arrangements.

2. The Applicant considers so. The Applicant has stated the reasons for retaining Field E23 for solar at **Ref. 5.5.7 of Applicant's Response to Deadline 2 Submissions [EN010158/APP/8.18] [REP3-051]**, in response to the Deadline 2 submission by Preston Farms Ltd and TCS Biosciences Ltd [\[REP2-107\]](#). In summary, and whilst precise figures cannot be confirmed until the detailed design stage, Field E23 is capable of providing approximately 15MW of renewable energy generation. This approximate figure is a correction on the approximate 12.25MW figure which was referenced at page 126 of **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049]**. This approximate capacity is therefore an important part of the Proposed Development to meet the policy objectives of maximising the energy generation, making efficient use of the land and meeting the urgent need for renewable energy as CNP infrastructure, in line with NPS EN-1 (2023). It should also be noted that under Paragraph 4.2.24 of NPS EN-1 (2025), *"measures that result in a significant reduction in generation capacity for CNP infrastructure are **unlikely** to be considered to be appropriate as mitigation"* (our emphasis). Exceptions to this may apply such as where *"mitigation could have a significant benefit and warrant a small reduction in generation capacity and function"*. The Applicant is confident this exception does not apply because a loss of approximately 15MW is a 'significant reduction in generation capacity' of the Proposed Development which is CNP infrastructure. In light of the proposed animal movement arc referenced above, the potential adverse effects would be further reduced, albeit with a corresponding reduction in generating capacity.

Q2.14.8

Assessment of residual effects on agricultural businesses and landholdings and other non-agricultural businesses

Environmental Statement (ES) Chapter 14 Population [\[REP2-033\]](#) states that the value (sensitivity) of non-agricultural business and development land as a receptor is high or very high.

The magnitude of change is given as minor (except for one topic area for one receptor - Hogshaw Farm and Wildlife Park) during construction and slight/negligible or minor (except for moderate effects experienced by two receptors/receptor groups for visual amenity only) during operation.

The sensitivity and magnitude for all receptors is not specified.

1. Identify the sensitivity and magnitude of change for each individual receptor considered within the assessment of other non-agricultural businesses.
2. In the context of concerns raised by TCS Biosciences Limited regarding the potential effects on their operation, provide further justification for the applicant's identification of a minor magnitude of change during the construction phase and slight/negligible or minor during operation and

1) Sensitivity and magnitude of change for each individual receptor considered within the assessment of other non-agricultural businesses

In-line with the approach to sensitivity set out in Table 14.21 of **ES Volume**

2, Chapter 14: Population [EN010158/APP/6.2.4], the sensitivity of non-agricultural receptors draws on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') and is influenced by changes to environment or access such that significant effects may:

- a) affect viability (Very High);
- b) affect operating practices, with limited capacity to absorb or respond to change (High);
- c) affect operating practices but not to a significant degree due to capacity to absorb or respond to changes (Medium); or
- d) affect operating practices such that significant effects may influence operating practices to a slight or hardly perceptible degree (Low).

As such, assessments are based on the factors that the business relies upon for its viability or operating model. In one case (TCS Biosciences Ltd), the potential for effects on viability are considered to meet the 'very high' criteria – the business is located partly within the Order Limits, so will experience changes in land and access, and interaction with Proposed Development's infrastructure directly, as well as experiencing immediate environmental effects. Its operating model is such that it relies upon access to and within land affected, and a strictly controlled environment.

All other non-agricultural receptors – including Hogshaw Farm and Wildlife Park, and Claydon House (and businesses within Claydon Courtyard) – as well as other non-agricultural businesses set out in **ES Volume 3, Figure 14.6a-b: Businesses within the community study area [EN010158/APP/6.3] [APP-073]** are

- overall conclusions. In doing so, have regard to any related potential implications for the NHS that may arise for conclusions in the ES.
3. In the context of concerns raised by Preston Farms Limited and A.E.J. & F.J. Claridge, provide further justification for the minor magnitude of change and overall conclusions identified for agricultural businesses and landholdings during both construction and operation.

identified as 'high' sensitivity receptors, noting that operating practices may be affected with limited capacity to absorb or respond to change.

This sensitivity is clearly influenced by the type of business, its operating model, and its reliance on accessibility and environmental quality – these receptors have been identified as 'high' sensitivity to be precautionary.

Sensitivity is not influenced by the type of change, rather the operation of the receptor itself, and is therefore considered to be the same during both the construction and operational (including maintenance) phases.

The magnitude of change for these non-agricultural receptors draws on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') and is determined by criteria set out in Table 14.22 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4]**, which considers whether there is:

- a) Loss, damage or change to attributes, quality or key characteristics or vulnerability (a Moderate/Major change would mean loss or severe damage e.g. direct total or partial acquisition and demolition compromising viability; a Minor change would be a discernible change in attributes, minor loss of or alteration to key characteristics – e.g. amendment to access or acquisition of land resulting in changes to operating conditions that do not compromise overall viability); and/or
- b) Introduction of severance with adequate accessibility provision (a Moderate/Major change would require the introduction of complete or severe severance with limited/moderate accessibility provision; a Minor change provides adequate accessibility provision).

In all cases, in the context of these criteria, at most a minor magnitude of change is anticipated on all non-agricultural business receptors during the construction or operational (including maintenance) phases including TCS Biosciences Ltd, Hogshaw Farm and Wildlife Park, and Claydon House (and businesses within Claydon Courtyard) – along with others identified and set out in **ES Volume 3, Figure 14.6a-b: Businesses within the community study area [EN010158/APP/6.3] [APP-073]**.

This is in consideration of embedded and additional mitigation in each case, including the provision of land swaps with equal or better provision of land in terms of quality and access, and additional mitigation has been developed through engagement with affected parties and in-line with standards and guidance for the management of (e.g. air quality, noise, traffic/access).

Following the application of these mitigations, the Applicant believes that there would remain discernible change in attributes and a minor loss of some key characteristics of these businesses including amendment to access or acquisition of land (which, where acquired, would be replaced) resulting in changes to operating conditions that do not compromise overall viability.

2) Further justification for the Applicant's identification of a minor magnitude of change on TCS Biosciences during the construction phase and slight/negligible or minor during operation and overall conclusions; and any related potential implications for the NHS that may arise for conclusions in the ES.

As the Applicant considers that effects on TCS Biosciences Ltd are mitigated through the provision of land swaps with equal or better provision of land in terms of quality and access, and additional mitigation has been developed through engagement with affected parties and in-line with standards and guidance for the management of (e.g. air quality, noise, traffic/access) adverse effects – and is designed to be flexible and responsive - the assessment concludes that although the business is of very high sensitivity, the magnitude of change would be minor resulting in a non-significant effect.

The Applicant recognises that TCS Biosciences Ltd supplies the NHS. It is not clear the extent to which TCS Biosciences's Ltd viability is predicated on this supply chain relationship, but it is acknowledged that TCS Biosciences Ltd has a variety of other clients and a commercial business model that is not solely reliant on the NHS as a customer.

In any case, the Applicant does not consider that there is a risk that:

- a) TCS Biosciences Ltd would be rendered unviable and therefore unable to continue to supply the NHS; or
- b) That the NHS would experience major effects on its operating model such that its diagnostics arm would be unviable – this is demonstrated through comments in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1** [REP3-049] which refers to the Parliamentary Under-Secretary for Health and Social Care, Mr Zubir Ahmed's, comments in Parliament in which it was stated that "There are a number of suppliers on NHS Supply Chain's current framework which offer donor animal blood supply for diagnostic use which support a level of resilience across England."

3) In the context of concerns raised by Preston Farms Limited and A.E.J. & F.J. Claridge, provide further justification for the minor magnitude of change and overall conclusions identified for agricultural businesses and landholdings during both construction and operation.

The Applicant has been mindful of concerns raised by both Preston Farms Ltd and A.E.J. & F.J. Claridge, who represent both agricultural and non-agricultural businesses within the Order Limits. These concerns relate to effects and mitigation relating to access, replacement land, environmental change and change in facilities and resources that may result in changes to the operation of these businesses.

As set out above, the minor magnitude of change reflects that the Applicant considers – drawing on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') that determines criteria set out in Table 14.22 of **ES Volume 2, Chapter 14: Population** [EN010158/APP/6.2.4] – that following mitigation there is:

- a) a discernible change in attributes, minor loss of or alteration to key characteristics – e.g. amendment to access or acquisition of land resulting in changes to operating conditions that do not compromise overall viability; and
- b) Introduction of severance but with adequate accessibility provision through mitigation.

A Moderate/Major change would require the introduction of complete or severe severance with limited/moderate accessibility provision; and loss or severe damage e.g. direct total or partial acquisition and demolition compromising viability.

The Applicant has worked to understand and sought to develop bespoke mitigation for the effects identified by both parties – this has included very specific tailored measures set out within submissions to-date including:

In relation to concerns raised by Preston Farms Ltd:

- The Applicant has previously provided information responding to concerns raised and addressing these through commitments to further bespoke mitigation measures as described in Appendix 1 to **Applicant's Response to Written Representations** [EN010158/APP/8.12] [REP2-086];
- Further information is included in response to submissions from Preston Farms Ltd received at Deadline 3 within the Applicant's response to those concerns at Deadline 4 (**Applicant's Response to Deadline 3 Submissions** [EN010158/APP/8.22]).

In relation to concerns raised by A.E.J. & F.J. Claridge:

- The **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1)** [EN010158/APP/8.16] [REP3-049] refers to:
 - a) The Applicant's commitments to liaison to address issues relating to minimise disruption at Knowlhill Farm within the **Outline CEMP** [EN010158/APP/7.2.5];

- b) Emerging agreement on replacement land at Knowlhill Farm, subject to legal agreements being finalised; and
- c) Regarding the acquisition of rights in Plot 2/6, the confirmation that the Applicant has updated at Deadline 3 the **Book of Reference** [EN010158/APP/4.3.4] [REP3-008], **Land Plans** [EN010158/APP/2.2.4] [REP3-004], **Works Plans** [EN010158/APP/2.3.5] and **Draft DCO** [EN010158/APP/3.1.7] to reflect that it is no longer seeking rights over this plot, thereby removing Plot 2/6 from the Order land (but keeping it within the red line boundary).
- The Applicant has amended and submitted an update to the **Design Commitments** [EN010158/APP/5.9.6] (design commitment G3) at Deadline 3 to protect access to the spring on which the farm relies for water.

Table 2-14.1: Soils

ExQ2 Ref	Question	Applicant's Response
Q2.15.1	Green and blue infrastructure The applicant updated the worst-case scenario considered in Environmental Statement (ES) Chapter 12 Soil [REP2-031] at deadline 2 to include the maximum areas that have been assessed, including the Battery Energy Storage System (BESS) and satellite collector compounds. Should the worst-case scenario also reference the land take for the green and blue infrastructure (10 hectares) assumed to be permanent in the assessment? If not, why not?	The green and blue infrastructure land take is not assumed to be permanent, rather it is assumed to be temporary. The wording in Paragraph 12.8.13 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] has been changed to clarify this. This is because following decommissioning, these areas would be handed back to the various landowners. The soils affected by green and blue infrastructure would remain capable of reinstatement to their original condition following decommissioning and will not see a permanent degradation of quality, as secured through the Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.3] [REP2-069]. Furthermore, during operation soil structure would undergo a slight beneficial effect in areas of green and blue infrastructure during operation owing to the land being removed from agricultural production. Therefore, the 10 hectares of blue and green infrastructure land take should not be referenced in the worst-case scenario assessment.
Q2.15.2	Green and blue infrastructure In response to the Examining Authority's (ExA) first written question (ExQ1) Q1.18.9, the applicant [REP2-087] stated that there would be an area of best and most versatile (BMV) agricultural land located within field B9 (adjacent to Knowl Hill) in Parcel 1 that is proposed as green and blue infrastructure but that none of this area is considered to be permanent for the purposes of the assessment as it would be reinstated to the same agricultural land classification (ALC) grade at the end of decommissioning. 1. Clarify this position in relation to the statement at paragraph 12.8.13 in the ES [REP2-087] that "For the purposes of this assessment, it has been assumed that Green Infrastructure has the potential to be permanent." 2. Identify on a plan all areas of green and blue infrastructure that have been assumed to be permanent for the purposes of the ES and confirm the ALC grade of this land.	1. The wording in Paragraph 12.8.13 of ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] has been updated at Deadline 4 to clarify that green and blue infrastructure is not assumed to be permanent for the purposes of the assessment. This is because following decommissioning, these areas would be handed back to the landowner. The soils affected by green and blue infrastructure would remain capable of reinstatement to their original condition following decommissioning and will not see a permanent degradation in quality, as secured through the Outline SMP [EN010158/APP/7.7.3] [REP2-069]. Furthermore, during operation soil structure would undergo a slight beneficial effect in areas of green and blue infrastructure during operation owing to the land being removed from agricultural production. 2. Considering the above, a plan has not been provided as there are no proposed areas of green and blue infrastructure assumed to be permanent for the purposes of the ES.

Q2.15.3

Soil ecosystems

The applicant's response to the Local Impact Report (LIR) [\[REP2-085\]](#) states that soil ecosystem services have not been assessed in Chapter 12 of the ES [\[REP2-031\]](#) as it pre-dates the updated Institute of Sustainability and Environmental Professionals guidance - A New Perspective on Land and Soil in Environmental Impact Assessment published in January 2026. The applicant has also updated Chapter 12 of the ES to clarify that soil structure is a more appropriate term for what is currently assessed in the ES.

To the applicant and Buckinghamshire Council:

1. Should the Chapter 12 of the ES be updated to assess soil ecosystems in line with the updated guidance? If not, why not?

To the applicant:

2. Notwithstanding the above question, whilst the applicant updated table 12.2 of the ES at deadline 2 to clarify that soil structure is a more appropriate term for what is assessed in the ES, the ExA and Buckinghamshire Council [\[REP3-053\]](#) note that the term soil ecosystems continues to be applied elsewhere in Chapter 12 of the ES. Undertake a review of the ES and update the terminology as appropriate.

The Applicant's response to the Local Impact Report (LIR) [\[REP2-085\]](#) contained a typographical error in referring to a different piece of guidance. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3]** predates the ISEP (formerly IEMA) guidance 'Soil Health in Environmental Assessment', which was published in 2025. It does not predate the 2022 IEMA 'A New Perspective on Land and Soil in Environmental Impact Assessment' guidance, which has been used extensively throughout the chapter.

As the ISEP 'Soil Health in Environmental Assessment' guidance was released post-submission, it would not be practical for the Applicant to add an additional soil health assessment at this stage. This would involve additional survey work which is not feasible within the remaining DCO examination timeline. Furthermore, the Applicant considers soil health through the provision of a soil health monitoring programme in the **Outline SMP [EN010158/APP/7.7.3] [REP2-069]**, the methodology of which was agreed with Natural England.

In line with the update made at Deadline 2 clarifying that 'soil structure' is a more appropriate term for the receptor given what is being assessed, **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3]** has been updated at Deadline 4 to refer to the receptor as 'soil structure', and not 'soil ecosystems', throughout for clarification.

Q2.15.4

Agricultural grazing

In response to ExQ1 Q1.4.2, the applicant [\[REP2-087\]](#) stated that the "...Outline Landscape and Ecological Management Plan (LEMP) secures under section 3.3 that the management of grassland within the Order Limits will be undertaken by a combination of sheep (under panels) and cattle grazing (areas with no panels)". However, paragraph 3.3.27 of the oLEMP [\[REP2-067\]](#) also states that "If grazing for any reason is not possible then a late summer cutting regime will be implemented." The applicant also suggests in response to ExQ1 Q1.18.4 that Rosefield Solar Farm would be responsible for managing the grazing in partnership with suppliers.

1. Under what circumstances would grazing not be possible?
2. The assessment of soil ecosystems in paragraph 12.10.14 of the ES appears to assume that nutrient input from grazing would occur which contributes to

1. The Applicant has indicated its willingness to secure grazing as part of the long-term management regime (and has had positive discussions with local suppliers who could provide either sheep or cattle grazing). Final agreements will be secured following consent and prior to operation of the Proposed Development. The Applicant intends to secure grazing as the preferred grassland management method. However, the **Outline LEMP [EN010158/APP/7.6.5]** allows for flexibility to use mechanical mowing and collection as an alternative option in the unlikely event that grazing is not possible due to factors outside of the Applicant's control at any point in time or location(s). Examples of circumstances where grazing would not be possible would include a disease outbreak which limits livestock grazing or in the highly unlikely event that the Applicant cannot procure flock(s) of sheep or herd(s) of cattle.
2. If grazing were not to be implemented, the assessment would still conclude a slight beneficial effect during operation due to the managed grassland on the Site. Nutrient input would still occur from the land being within a cutting regime as the grassland will provide nutrient input into the soil. It is recognised that grazing is able to provide additional nutrients however in the absence of grazing nutrient input from the managed grassland will still occur.
3. **Appendix 5** to the **Outline LEMP [EN010158/APP/7.6.5]** shows the areas where cattle grazing would be preferred. Paragraph 5.2.4 of the **Outline LEMP [EN010158/APP/7.6.5]** indicates that cattle may be used to graze the larger grassland areas, such as the other neutral grassland areas for ground nesting birds. These areas would have sufficient space to accommodate cattle and equipment forming part of the Proposed

the applicant's conclusion of a slight beneficial effects during operation. Confirm the implications for the conclusions in the ES if grazing were not to occur.

3. Provide further details of how the layout and design and of the proposed development would enable grazing to be feasible during the operational phase.
4. Is the potential grazing dependant on it being a commercially viable operation? If so, provide details to demonstrate that grazing would be viable.

Development would not be located in these fields and would therefore not be damaged by the larger animals. As shown by **Appendix 6** to the **Outline LEMP [EN010158/APP/7.6.5]**, the areas where cattle grazing would be preferred are either currently used for grazing or adjacent to areas used for grazing, which demonstrates that they would be suitable for this purpose. These areas are also accessible by internal access tracks, which would allow access for the purposes of moving and managing the cattle. Sheep grazing under panels would also be accessible by internal access tracks for the purposes of moving and managing the livestock, and sheep are suitable to provide grazing under the panels as they are less likely to damage infrastructure than larger herbivores. Sheep grazing is a method employed to manage grassland on many solar farms.

4. Grazing is generally commercially viable for solar farms, it is currently undertaken on various solar farms and is a proven and viable method of grassland management. Grazing of the Proposed Development would not need to form a commercially viable farming operation in its own right, and would be the preferred management method at the Proposed Development even if it were more expensive than other methods.

Q2.15.6

oSMP - Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings

Respond to Buckinghamshire Council's request [\[REP3-055\]](#) for the oSMP [\[REP2-069\]](#) to apply the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings.

The Applicant acknowledges that, in accordance with the Institute of Quarrying (IoQ) guidance, clay and heavy clay loam soils have an inherently low resilience to structural damage when considered on the basis of textural class alone. However, the IoQ guidance also states that the resilience is significantly modified by the soil water regime (Soil Wetness Class) and the local climate. This is consistent with the IEMA guidelines classifying the clay and heavy clay loam soils as medium resilience due to the field capacity days being fewer than 150.

Furthermore, the **Outline SMP [EN010158/APP/7.7.3] [REP2-069]** explicitly recognises compaction as the principal risk associated with the Proposed Development and sets out a comprehensive framework of control measures. Soil handling suitability is therefore not overestimated in the **Outline SMP [EN010158/APP/7.7.3] [REP2-069]**.

The assessment therefore already applies the principles of the IoQ guidance, as the classification of resilience as medium is in accordance with the IoQ assertion to take climate into account.

Q2.15.7

Soil reinstatement

The applicant's response to ExQ1 Q1.18.12 [\[REP2-087\]](#) states that "The entirety of the Order Limits will be reinstated to the same ALC grade as prior to installation of the Proposed Development as set out and secured in Outline SMP". Would this include the 10 hectares of green and blue infrastructure that is assumed to be permanently lost in the ES Chapter 12 [\[REP2-031\]](#)? If not, should the oSMP [\[REP2-069\]](#) make this clear?

ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] has been updated at Deadline 4 to specify that the 10 hectares of green and blue infrastructure is assumed to be temporary, as following decommissioning, these areas would be handed back to the relevant landowner(s). The soils affected by green and blue infrastructure would remain capable of reinstatement to their original condition following decommissioning, will not see a permanent degradation of quality, as secured through the **Outline SMP [EN010158/APP/7.7.3] [REP2-069]**. Furthermore, during operation soil structure would undergo a slight beneficial effect in areas of green and blue infrastructure during operation owing to the land being removed from agricultural production. This is consistent with the Applicant's response to ExQ1 Q1.18.12 that the entirety of the Order Limits will be reinstated to the same ALC grade as prior to installation of the Proposed Development as set out and secured in the **Outline SMP [EN010158/APP/7.7.3] [REP2-069]**.

Q2.15.9

Future baseline – climate change

The applicant's response to the ExA's first written questions (ExQ1) Q1.18.6 acknowledges that ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [\[APP-105\]](#) notes increased winter precipitation, increase in magnitude and frequency of extreme rainfall events, and increased risk of drought as a likely climate change effect during the operational phase and that such changes may affect elements relating to soil resources such as moisture

Climate change projections, including changes in rainfall patterns and seasonal variability, have been considered in the embedded design and mitigation measures for the Proposed Development. In particular, the **Outline Drainage Strategy [EN010158/APP/7.11.4] [REP3-040]** incorporates the use of Sustainable Drainage Systems (SuDS) to manage surface water runoff across the Site. These measures reduce the risk of localised erosion during periods of increased rainfall intensity, therefore supporting the soil stability, and reduce the potential for erosion under future climatic conditions.

In addition, the Proposed Development would maintain a grassland cover across the majority of the Site during operation. This provides protection of the soil surface, reduces susceptibility to erosion during heavy rainfall events, and supports soil moisture retention during drier periods as well as preventing erosion. The Applicant considers that the combination of drainage design, vegetation management, and soil protection measures provide an appropriate

conditions. Clarify how such conditions have been taken into account in ES Chapter 12 [\[REP2-031\]](#).

framework to protect soils against degradation processes during the operational phase, and ensure that soil function and agricultural use are not adversely affected over time in line with climate change projections.

Q2.15.10

ES Chapter 12 – formatting

Correct the formatting issues present in table 12.4 of ES Chapter 12 Population (clean) [\[REP2-031\]](#).

The Applicant understands the reference to “Population” here to be a typographical error and that it should instead reference that Soil chapter. **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3]** Table 12.4 has been updated at Deadline 4 to fix the formatting errors.

Q2.15.11

ES Chapter 12 – magnitude

Provide further justification for the negligible magnitude of effect identified for the land take of 3.01 hectares of grade 2 agricultural land during the construction phase in the context of the criteria for magnitude specified in table 12.8 [\[REP2-031\]](#). Buckinghamshire Council [\[REP3-053\]](#) and the ExA note that the description of magnitude in table 12.8 indicates that a “minor” magnitude of effect for grade 2 land would be more accurate. Such a change would also indicate a moderate or large effect according to table 12.9 which would be significant. Update ES Chapter 12 as appropriate.

The assessment of impacts in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3]** on ALC Grade 2 land has concluded that a negligible magnitude of impact is the correct classification.

The criteria related to temporary developments provides that the magnitude of impact is minor if the impact is a temporary, reversible loss of soil-related features, or negligible if there is ‘no discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use’.

The extent of ALC Grade 2 land is limited (3.01 ha), and there is no loss or reduction in soil function or soil volumes, as all Grade 2 land is either untouched, under a grass sward in the areas of Solar PV development, or hosting ecological mitigation/enhancement. Furthermore, the timing of construction works will be managed carefully to consider weather conditions, soils only will be worked and trafficked on when they are suitably dry and below the plastic limit. All construction activities are subject to committed mitigation in the **Outline SMP [EN010158/APP/7.7.3]** [\[REP2-069\]](#).

A negligible magnitude of impact on a very high sensitivity receptor results in a slight adverse and not significant effect.

Table 2-15.1: Transport and Access

ExQ2 Ref	Question	Applicant's Response
Q2.16.1	Staff parking during construction In relation to on-site staff parking during construction, the applicant's response to the Examining Authority's (ExA) first written question (ExQ1) Q1.19.6 [REP2-087] states that the “total number of parking spaces will be determined once the confirmed number of staff has been made (but will not exceed the assessed 600 employees stated in the assessment).” Should the outline Construction Traffic Management Plan (oCTMP) [REP2-065] make a clearer commitment to tie the number of spaces to the mode share? If not, why not?	At present the Applicant wishes to retain flexibility in the number of spaces provided to ensure that it accords with the mode share requirements and staff numbers. The mode share targets have been included in the Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.4] submitted at Deadline 4.
Q2.16.2	Pedestrians, cyclists and equestrians To the applicant and Buckinghamshire Council: 1. Is there any data available regarding the use of public rights of way (PRoW), permissive paths and the highway network in the study area of	1. There is no count data available for the PRoW network. 2. Within the assessment set out in ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058], it has been assumed due to the lack of traffic on the PRoW network, that any increase would be in excess of 100%, and the assessment has been undertaken on that basis. Following the provision of mitigation in the form of Outline RoWAS [EN010158/APP/7.8.5] [CR1-026] and Outline CTMP [EN010158/APP/7.5.4],

Environmental Statement (ES) Chapter 15 Transport and Access [\[APP-058\]](#) (including Station Road/Dewes Lane, Snake Lane/Fidlers Field and Granborough Road), by pedestrians, cyclists and equestrians? If so, please submit the data.

To the applicant:

2. If available, explain how such data has informed the applicant's assessment of effects on ES Chapter 15 Transport and Access [\[APP-058\]](#). If no such data is available, explain how the applicant has been able to reach a conclusion of minor (not significant) effects for all receptors assessed.

the effects have been considered to be minor and not significant for transport and access receptors within the Site.

Q2.16.3

Construction traffic route

Provide further justification for the proposed construction traffic route having regard to any reasonable alternatives that were considered.

Further details of the construction access strategy are provided in the **Construction Access Review** [\[EN010158/APP/8.26\]](#) submitted at Deadline 4.

Q2.16.4

oCTMP - mode share

At issue specific hearing 1, the Council indicated [\[REP3-056\]](#) that it would explore the coverage of the mode share in the oCTMP [\[REP2-065\]](#) with the applicant further. Please provide an update on discussions and update the oCTMP if appropriate.

Following discussions with Buckinghamshire Council, the mode shares have been updated within the **Outline CTMP** [\[EN010158/APP/7.5.4\]](#), submitted at Deadline 4.

Q2.16.5

Junction modelling at the A41/ Station Road junction

In its response to ExQ1 Q1.19.8 [\[REP2-087\]](#) stated that junction modelling for the A41 / Station Road junction would be provided at deadline 3. This information does not appear to have been forthcoming. Submit this information at deadline 4 and confirm the outcome of any discussions held with Buckinghamshire Council on this issue.

ES Volume 4, Appendix 15.1: Transport Assessment [\[EN010158/APP/6.4.2\]](#) has been amended to include the junction modelling, and has been submitted at Deadline 4.

The modelling indicates that sufficient spare junction capacity exists at the junction to accommodate the development traffic. This information has been provided to Buckinghamshire Council for their consideration. No adverse comments have been received to date on this matter.



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