



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Buckinghamshire Council's comments on the Applicant's
Documents submitted at Deadline 3**

Buckinghamshire Council

June 2026

Introduction

This document sets out Buckinghamshire Council's review of the Applicant's updated submissions at Deadline 3. It should be read alongside the Council's Local Impact Report and subsequent written submissions, which remain unchanged unless explicitly stated.

The Council's overarching position on the Proposed Development is not altered by the updates submitted at Deadline 3. Where comments are provided, these are intended to assist the Examining Authority by identifying areas where further clarification, refinement or correction is required, and to progress technical matters through Examination.

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

Table 1: Buckinghamshire Council's comments on the Applicant's Documents submitted at Deadline 3

Document Reference	Document Title	Buckinghamshire Council Comments
<u>REP3-025</u>	6.4.2 Environmental Statement Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment Rosefield Solar Farm BNG Statutory Metric	The council had a discussion with the applicant regarding the BNG methodology on 3/06/2026 and we understand that the applicant intends to update the calculations and report/methodology by deadline 4.
<u>REP3-037</u>	7.8.4 Outline Rights of Way and Access Strategy (Tracked) (Rev 4)	Amendment includes reference to BS 5709 2018 which resolves this matter.
<u>REP3-048</u>	8.15 Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes	The Council does not agree that the conclusions reached fully reflect the likely extent and experience of cumulative effects on the ground, particularly in relation to landscape and visual receptors. The assessment underestimates the cumulative harm arising from the concentration of large-scale energy infrastructure within the same landscape; and Greater weight should be given to the combined extent, interaction and perception of development.
<u>REP3-049</u>	8.16 Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1)	Internal p.77 (post-hearing note): In respect of the use of Granborough Road for access, the Council note that it has not raised an objection to that road's use. However, for transparency, in coming to that position the Council has not seen a specific highways-related assessment which addresses the effects that Preston Farms and TCS Biosciences have identified on their operation. As a result, the Council's position should not be understood to extend to the concerns that those Interested Parties raise.

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		Internal p.109 (action point 5): the Council has commented on para 4.11.12 of NPS EN-1 in its response to the ExAQ2. In respect of para 3.2.6, of NPS EN-1, the Applicant's response is noted. The Council recognises that the NPS reflects the support that BESS can offer PV schemes. However, the point the Council made at ISH1 related to the reliance upon the policy in para 3.2.6 specifically in respect of BESS. The Council consider that care must be taken in understanding the scope of para 3.2.6. That is because para 3.2.6 is not merely a reflection of general supportive Government policy, but instead operates to determine the question of need (at the policy level) for types of development to which it applies. There is no doubt that an NPS can do this; it is provided for by s.5(5)(a) PA 2008. However, for the purposes of the Proposed Development, para 3.2.6 determines this issue for the PV. For the PA 2008, BESS can only ever be "associated development" (see ss.14 and 15 PA 2008, and also the scope of NPS EN-1 itself at para 1.3.4). Thus, it appears to the Council that it would risk misinterpreting NPS EN-1 and the PA 2008 to say that the need for BESS is set at the policy level by para 3.2.6 of NPS EN-1. Internal p.121 (action point 26): the Council notes that it has commented on glint and glare in response to ExAQ2. However, it is noted that this again suggests that minor roads are low sensitivity, and appears to justify this primarily by reference to density of traffic (noting that "safety hazard") is instead discussed in the context of PRow. Indeed, the answer to AP26 appears to recognise the seriousness of glint and glare effects on any part of the road network. The Council would again welcome submission of the relevant guidance document on which reliance has been placed, and would also welcome an explanation of how specifically safety hazards to individual vehicles (separate to the question of traffic density) has been taken into account when assessing the sensitivity of minor roads.

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REP3-050	8.17 Written Summary of Applicants Oral Submissions at Issue Specific Hearing 2 (ISH2)	Internal p.12 (post-hearing note): the Council notes the identification of provisions in the Outline Plans dealing with restoration of street and PRow surfaces and welcomes the changes to be introduced at Deadline 4. Subject to considering the wording the Council consider this issue to be resolved. Internal p.23 (post-hearing note): the Council is currently engaged in discussions with the applicant on Schedule 16. Internal p.28 (action point 5): see comments on p.12 above. The Council has been advised that the requested 2m recorded width for all proposed, permanently diverted PRowS was omitted from the amended draft DCO submitted at Deadline 3, but will be included at Deadline 4.
REP3-052	8.19 Applicants Response to Action Point 7 from ISH1	Having considered the Applicant's latest response, as set out in the Applicant's response to Action Point 7 from ISH1, the Council has reviewed its position in respect of the siting and acceptability of the BESS. The Council acknowledges the Applicant's assessment that Fields E10 and E11 are constrained having regard to this further material. Notwithstanding, the Council's remains concerned about the location of the BESS. The additional evidence reinforces the Council's view that the BESS represents a substantial industrial form of development, the effects of which particularly in terms of noise, activity and perception. The effects identified by the Applicant, including the potential for significant adverse noise effects and cumulative interaction with other BESS infrastructure around the substation. The emerging concentration of energy infrastructure in the vicinity of the substation, including grid-scale BESS proposals, which are more appropriately located alongside existing infrastructure. In that

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		context, the inclusion of a further BESS within the application site would contribute to an intensification of industrial character across the wider countryside, rather than representing a necessary or well-related component of this scheme. Whilst the Council accepts the Applicant's reasoning as to why Fields E10 and E11 are unsuitable, it maintains its objection to the BESS on the basis that it is not appropriate in principle in this location; and its impacts, particularly when considered alongside existing and consented infrastructure, are greater than is suggested and not adequately justified.