



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Buckinghamshire Council's Updated Principal Areas of
Disagreement**

Buckinghamshire Council

June 2026

Introduction

This document provides an updated summary of the principal areas of disagreement between Buckinghamshire Council and the Applicant at Deadline 4, based on the submitted Environmental Statement, subsequent clarifications, and the Council's Local Impact Report. It sets out the key issues where significant concerns remain, the reasons why the Council considers the Applicant's assessment or mitigation to be inadequate, and the remedy measures that would be required to address those concerns. As a summary document it is necessarily not comprehensive. It is also preliminary and will be refined over time alongside the SoCG reflecting the position between the parties.

Table 1 – Outstanding Principal Areas of Disagreement

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
<p>Site Selection</p>	<p>Site selection process appears to have been driven primarily by single landowner availability, not by a constraints-led or environmentally proportionate assessment.</p> <p>Lack of evidence that other land parcels within the 10km search area were identified, evaluated or discounted on environmental, landscape or planning grounds.</p> <p>No clear demonstration that the Applicant considered alternative locations for the BESS, including less visually sensitive parcels.</p> <p>Insufficient assessment of the undulating landform, which intensifies visual prominence from PRowS and settlements.</p> <p>Failure to consider whether flatter or more enclosed areas both within and outside the landholding could reduce landscape, heritage or ecological harm.</p> <p>Incomplete exploration of opportunities to co-locate the BESS with existing or consented energy infrastructure, including the</p>	<p>Provide an alternatives assessment, demonstrating a constraints-led approach to site selection across the full 10km search area.</p> <p>Reassess all available land parcels (inside and outside the willing landowner area) against ecological, landscape, heritage and PRowS sensitivity.</p> <p>Relocate the BESS away from fields D8/D9 to a less visually elevated and less heritage-sensitive parcel with better containment.</p> <p>Demonstrate that the chosen layout represents the least-harm option within the Order Limits, evidenced through sequential design testing.</p> <p>Provide an options appraisal for co-location with existing or consented infrastructure, especially the National Grid substation and adjacent consented BESS.</p> <p>Include detailed topographical and ZTV-led analysis showing how alternative siting could reduce visual harm.</p>	<p>Low</p>

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	<p>National Grid substation and consented BESS sites.</p> <p>Insufficient justification for selecting fields D8/D9 for the BESS despite elevated, visually exposed, and heritage-sensitive context.</p> <p>No transparent assessment showing whether alternative layouts within the Order Limits could avoid highest-sensitivity landscape, ecological and heritage receptors.</p> <p>Issues related to removal of panels from PV for ecological and landscape reasons are addressed in the appropriate section below.</p>	<p>Revisit design to avoid siting infrastructure in parcels within the highest ecological sensitivity, including areas forming critical habitat connectivity.</p> <p>Supply full justification for why alternative land parcels could not be used, aligned with EN-1 and EN-3 requirements for proportional alternatives assessment.</p>	
Ecology	<p>High risk of significant harm to a genetically vulnerable and isolated Bechstein's population within the Core Sustenance Zone of Finemere Wood.</p> <p>Solar infrastructure proposed in key foraging and commuting fields (B6, B7, B8, B10, B11, D28, D29), contrary to advice from Natural England, BBOWT, and Council's position.</p> <p>Proposed buffers below VALP NE8: insufficient setbacks from ancient woodland, other woodland, and hedgerows.</p>	<p>Remove solar infrastructure (arrays, cabling, compounds) from key bat foraging/ commuting fields B6, B7, B8, B10, B11, D28 and D29.</p> <p>Increase all ecological buffers to comply with VALP NE8:</p> <ul style="list-style-type: none"> • 50m to ancient woodland • 25m to other woodland • 10m <i>each side</i> of all hedgerows <p>As measured from the edge of the existing feature.</p> <p>Redesign layout to maintain continuous, dark, uninterrupted ecological</p>	Low

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	<p>Loss of approx. 2,060m of hedgerow, including 1,310m permanent, leading to fragmentation of ecological networks in the Bernwood Opportunity Area.</p> <p>Compensation land for ground-nesting birds not yet provided in enough detail to be assured it is sufficient. Land identified may be of suitable topography. Further detail on management prescriptions require.</p> <p>Lack of HS2-style flight-line monitoring for bats; monitoring proposals too high-level. These measures will need to be agreed with Natural England in line with HS2 licence and monitoring agreements.</p> <p>Cumulative effects with HS2, East West Rail, solar/BESS schemes under-assessed, despite overlapping ecological constraints.</p>	<p>corridors between Sheephouse Wood, Shrubs Wood, Finemere Wood and Runt’s Wood.</p> <p>Identify and secure sufficient compensation land and land management actions to compensate for the displacement of 39 breeding pairs of skylark.</p> <p>Provide a detailed monitoring strategy, covering bats, ground-nesting birds, and wider farmland bird assemblages. The strategy needs to clearly set out what remedial measures will be undertaken if populations are found to be impacted.</p> <p>Avoid artificial lighting in all sensitive parcels and secure a strict dark-sky strategy.</p>	
Arboriculture	<p>Further clarity is required on the traceability between surveyed arboricultural features. RPAs, woodland groups, buffers, proposed works and the final AMS/CEMP controls</p>	<p>Provide clear cross-reference schedule/plan linking retained features with buffers, proposed works and the relevant AMS/CEMP protection measures.</p> <p>Recalculate and enlarge RPAs for all veteran, ancient and</p>	High

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
	<p>Insufficient protection for veteran and ancient trees, and no clear allowance for future veteran potential.</p> <p>Drainage and construction activity located within woodland buffers, undermining their purpose and increasing risk of hydrological change.</p> <p>Inconsistent treatment of woodland edges, with buffers measured from centreline rather than edge, reducing effective stand-off distance.</p> <p>Lack of clarity on decommissioning impacts, including future excavation near sensitive tree roots.</p> <p>Several attenuation basins, swales and drainage features are located within or directly adjacent to woodland buffers, undermining buffer function and risking ecological and hydrological impacts.</p> <p>Lack of clarity over whether drainage features have been designed to avoid encroachment into Root Protection Areas, woodland edges, and established habitats.</p> <p>The main disagreement relates principally to the timing,</p>	<p>future-veteran trees; apply enhanced buffers where required.</p> <p>Confirm whether works can be relocated outside sensitive buffers/RPAs. Where they remain demonstrate through the AMS/CEMP that they can be constructed maintained, decommissioned without harm, using no-dig, hand digging, trenchless techniques and arboricultural supervision where required.</p> <p>Relocate all attenuation ponds, surface-water features, trenches and excavations currently shown within or immediately adjacent to woodland buffers.</p> <ul style="list-style-type: none"> • protection fencing specification and timing of implementation. • Provide future-growth modelling for trees and hedgerows to show long-term compatibility with solar infrastructure. • Clarify decommissioning impacts, including avoidance of excavation close to retained trees and woodland edges. 	

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	content and enforceability of the AMS / CEMP controls	Remove infrastructure from HS2 woodland compensation planting areas, maintaining ecological connectivity intended by HS2's mitigation.	
Landscape and Visual	<p>Significant adverse effects on landscape character across the Claydon Bowl, Hogshaw Claylands, Twyford Vale and areas within the Aylesbury Vale Area of Attractive Landscape.</p> <p>Undulating landform and elevated settlements (particularly Botolph Claydon) increase visibility of solar arrays and the BESS, resulting in an industrialising effect inconsistent with the rural character of the Vale.</p> <p>Severe visual harm to users of nearby PRoWs, especially the Bernwood Jubilee Way, where views toward and from ridge-top sections would become dominated by solar arrays and BESS structures.</p> <p>BESS location in fields D8/D9 is highly visually exposed, introduces large-scale engineered massing and noise fencing, and conflicts with settlement setting and key panoramic views.</p>	<p>Remove or relocate solar arrays from the most visually sensitive and elevated parcels, particularly within Parcels 1 and 2 and fields D28–D29.</p> <p>Relocate the BESS from fields D8/D9 to a more visually contained parcel such as:</p> <ul style="list-style-type: none"> • Fields D18–D19 (south, reduced intervisibility with settlements/PRoWs) <p>Introduce stronger, landscape-led mitigation using landform-responsive woodland belts and structural planting rather than reliance on hedgerow infill.</p> <p>Increase setbacks from PRoWs and reduce enclosure effects by avoiding over-planting that alters currently open rural character.</p> <p>Provide a revised cumulative LVIA reflecting full combined</p>	Low

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	<p>Mitigation proposed by the Applicant (hedgerows, fencing, localised planting) is insufficient and in some cases worsens impacts by enclosing formerly open rural views or introducing incongruous fencing.</p> <p>Cumulative landscape effects with HS2, EWR, existing/consented BESS, and other solar developments are under-assessed and materially understate combined impacts on rural character and tranquillity.</p>	<p>impacts with HS2, EWR, National Grid works, and other local solar/BESS schemes.</p> <p>Revisit LVIA significance judgements using a precautionary approach that reflects low landscape capacity and high sensitivity of PRoW users.</p>	
Cultural Heritage	<p>Under-assessment of the contribution of setting to significance, particularly in relation to Claydon House, its parkland, and its historic outlying estate farms and in relation to Botolph House.</p> <p>Insufficient consideration of important designed and associative relationships and views , such as intended views of the two churches the</p> <p>Homogenisation of the historic agricultural setting, replacing historic field patterns with linear engineered infrastructure.</p> <p>Cumulative intensification arising from other major</p>	<p>Re-siting of the BESS further from Botolph Claydon and sensitive ridge-top views.</p> <p>Removal or relocation of solar arrays from the former estate landscapes south of Orchard Way and from fields forming important components of the Claydon House setting. And removal of features to the east of Botolph Claydon</p> <p>Improved, locally appropriate planting proposals, avoiding enclosure that erodes historic openness or intervisibility or screens key views from heritage assets. Further screening has been found to impact on other topic's</p>	<p>Low</p> <p>Low (unlikely to be resolved)</p>

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	<p>infrastructure (HS2, EWR, other solar/BESS schemes), which amplifies the extent of harm to an already pressured historic environment.</p> <p>Understated impacts on Botolph Claydon Conservation Area, including erosion of the historic character of approaches, the loss of agricultural character fundamental to their significance and the legibility and character of their wider relationships.</p>	<p>receptors and it has been found that mitigation in this regard may not be possible</p> <p>More analysis of historic landscape character, acknowledging the coherence and time-depth of the estate landscape and the level of survival and contribution of the historic setting of Botolph Claydon Conservation Area and East Claydon.</p>	
<p>Population and Human Health</p>	<p>Population</p> <p>Insufficient assessment of local businesses, local employment, agricultural displacement and tourism. The reporting groups multiple businesses into combined receptor groups for which a single set of assessment inputs is produced - i.e. one sensitivity, one impact magnitude and a generalised mitigation reference, then leading to a single residual effects assessment.</p> <p>Lack of underpinning evidence to demonstrate that individualised analysis has been undertaken, leading to design refinement and targeted mitigation. This leads</p>	<p>Population</p> <p>Provide a technical appendix to the Population assessment that transparently sets out individual receptor pathway-mitigation and outcomes and demonstrates how targeted mitigation has been correctly developed, with agreement of affected receptors, to lead to an overall single summary conclusion of residual effects for each receptor cluster type.</p> <p>The Council would welcome a further review of the way in which the Population assessment integrates the contributing topic assessment findings, at the point at which consensus is</p>	<p>Medium</p>

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	<p>to a concern that the approach dilutes the expression of the magnitude of impacts.</p> <p>Tourism assessment is based on sensitivity judgments that draw from cultural heritage, PROW and landscape and visual assessments. As discussed at ISH1, the Council has reservations regarding the sensitivity and value assigned within those contributing topics; with this uncertainty then permeating into the population assessment.</p> <p>Human Health</p> <p>Human Health effects are reported in a summary document, presented as an Appendix and an Annex to that Appendix. Perceptually, this affords lesser weight than the reporting in the topic chapters of the ES. Furthermore, the significant residual effects reported have not been added into the NTS, with the Applicant indicating that it does not intend to (as at D3). Consequently, the NTS does not currently report all residual significant adverse effects.</p> <p>The Health and Wellbeing Summary has been iteratively developed to better reflect the IEMA/ISEP Health in EIA</p>	<p>reached that the assessments can be relied upon.</p> <p>Human Health</p> <p>Convert the Health and Wellbeing appendix and annex into a standalone ES chapter. This should be supported by a technical appendix that transparently sets out the professional judgement relating to the assets and groups that form clustered receptors, highlighting variations in sensitivity to change, targeted mitigation and how this is factored into umbrella judgements of significance for clustered receptor types.</p> <p>Add the residual significant adverse health effects to the NTS.</p> <p>Signpost how the full list of determinants of health in the ISEP (formerly IEMA) Health in EIA methodology and Social Impact Assessment in EIA have been addressed within the assessment. This should include justifications for aspects scoped out and a clear basis of health-specific significance criteria, including determinants of health connected to social impacts.</p>	

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	<p>methodology; however, the coverage of health determinants cited in the more recent ISEP SIA in EIA methodology is not transparent. This is particularly relevant to mental health and wellbeing assessment, which is considered insufficiently robust.</p> <p>There is a lack of transparency/explanation re: professional judgement that has been applied to differentially assigning significance to moderate adverse residual effects. This is compounded by the clustering approach to the formation of receptors, with the single assignment of sensitivity, impact magnitude and significance of effects essentially diluting and / or disguising more acute adverse impacts on certain groups. BC is concerned this contributes to mitigation being insufficient to fully address significant adverse effects.</p> <p>Insufficient analysis and reporting of differential effects for vulnerable or high-exposure groups (e.g. older residents, school children, local workers, users of PRowS near the BESS).</p>	<p>Improve the evidence base and description of the vulnerable groups and receptors most sensitive to noise, traffic, dust, landscape change and loss of access. This needs to flow into the assessment itself, with consistent and transparent reporting of differential effects from those experienced by the wider population.</p> <p>Produce an integrated assessment of combined effects, rather than isolated topic-by-topic analysis.</p> <p>Assess and mitigate effects on PRow users, including impacts on mental wellbeing from loss of tranquillity and increased noise.</p> <p>Provide clear assessment of construction-phase exposures (dust, HGV movements, vibration, temporary diversions, noise).</p> <p>Include mitigation for community amenity, such as avoiding peak school hours for HGV movements and improving PRow accessibility.</p> <p>Provide a complaints and rapid-response mechanism</p>	

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	<p>Lacks demographic analysis to understand differential health effects, particularly for receptors closest to the BESS and construction routes.</p> <p>Combined (cumulative) effects of noise, construction traffic, air quality, landscape change and PRow disruption not assessed together. Notably the contribution to in-combination amenity impacts is not covered, nor the indirect impacts to mental health and well-being.</p> <p>Insufficient analysis of the potential for increased stress, anxiety and loss of amenity, especially for residents near construction routes and PRowS adjacent to the BESS.</p> <p>Limited analysis of temporary construction effects, including dust, HGV noise, vibration and disruption to daily movement patterns.</p> <p>Does not address health impacts of severance for communities reliant on PRow networks for recreation and mental wellbeing.</p> <p>No clear assessment of how access to green space, tranquillity, or recreational walking routes will be affected.</p>	<p>for residents during construction and operation.</p> <p>Improve mitigation for operational noise around the BESS where significant effects may arise from low background levels.</p> <p>Clarify how the development will maintain or improve access to recreation, green space and safe walking routes during construction.</p> <p>Commit to an updated package of mitigation in the OEMP to ensure ongoing protection of health and wellbeing throughout the 40-year operational period.</p>	

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Public Rights of Way	<p>All diversions do not meet minimum width standards (2m for footpath), and definitive widths are not secured.</p> <p>Insufficient assessment of PRow amenity impacts, particularly where routes pass close to solar arrays or the BESS.</p> <p>Failure to identify or mitigate loss of openness, tranquillity and rural character experienced by users.</p>	<p>Secure minimum 2m width on all newly created footpaths; include width in the definitive statement.</p> <p>Enhance amenity through wider mitigation: set back panels, avoid over-enclosure and maintain local rural character.</p> <p>Deliver positive enhancements:</p>	High
Socio-economics	<p>Assessment does not quantify local employment benefits, nor distinguish between local, regional and national labour supply.</p> <p>Limited understanding of effects on local businesses, especially those dependent on rural tranquillity including TCS Biosciences (e.g., farms, equestrian businesses, wedding venues, holiday lets).</p> <p>No detailed assessment of impacts on agricultural productivity, given 647 ha removed from use for 40 years.</p> <p>Lack of clarity on how construction traffic, noise and PRow diversions may affect</p>	<p>Provide a strengthened Socio-economic Assessment, quantifying:</p> <ul style="list-style-type: none"> • local vs regional employment benefits • supply chain opportunities within Buckinghamshire • construction workforce numbers and duration <p>Undertake detailed assessment of impacts on local businesses, particularly farms, equestrian centres, tourism operators and rural enterprises.</p> <p>Supply full analysis of agricultural displacement, including compensation, alternative land strategies, and long-term economic loss.</p>	Medium

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	<p>tourism, recreation and community wellbeing.</p> <p>Insufficient consideration of impacts on local service providers, including pressure on road networks that underpin local trade.</p> <p>No quantification of temporary economic disruption for farm operations, farm access routes or grazing arrangements.</p> <p>No assessment of wider effects on community identity and rural character, both material to socio-economic wellbeing.</p>	<p>Include assessment of how PRoW disruption and landscape change affect recreational value, tourism use and rural wellbeing.</p> <p>Provide mitigation for construction-phase disruption (e.g., scheduled delivery hours, seasonal protection for visitor businesses such as Hogshaw Farm).</p> <p>Commit to local workforce and procurement policies, maximising employment within Buckinghamshire.</p> <p>Supply a cumulative assessment integrating effects of HS2, EWR and other large projects on the local economy.</p> <p>Secure all socio-economic commitments through the OEMP, including local engagement, notification procedures, and business support measures.</p>	
Materials and Waste	<p>The ES provides limited detail on expected waste arisings from construction, operation and decommissioning.</p> <p>No clear breakdown of waste types, volumes or disposal</p>	<p>Provide a detailed Waste Management Plan setting out:</p> <ul style="list-style-type: none"> • materials required • waste types and volumes • segregation and recycling processes 	High

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	<p>routes, making it difficult to assess local capacity impacts.</p> <p>Insufficient explanation of how waste will be segregated, recycled or reused, particularly for soils, cabling, packaging and construction materials.</p> <p>Lack of clarity on chain-of-custody controls and how compliance with waste duty-of-care requirements will be demonstrated.</p> <p>Decommissioning proposals are high-level, with no assessment of end-of-life waste volumes, including panels, batteries and inverters.</p>	<ul style="list-style-type: none"> disposal facilities and licensed carriers <p>Commit to maximum feasible reuse/recycling rates, with clear targets secured in the OEMP.</p> <p>Provide a transparent duty-of-care and audit trail process for all waste movements.</p> <p>Supply decommissioning-phase waste analysis, including panel and BESS recycling pathways.</p> <p>Confirm that local waste infrastructure has sufficient capacity to manage predicted arisings during peak construction.</p>	
Climate Change	<p>Assessment does not include a full climate-resilience review, particularly for extreme heat, rainfall intensity and long-term soil wetness.</p> <p>Limited analysis of how flood risk, drainage and groundwater changes under climate-change scenarios may affect infrastructure such as the BESS, inverters and access tracks.</p> <p>No clear assessment of cumulative carbon impacts,</p>	<p>Provide a full climate-resilience assessment aligned with UKCP18 projections, covering heat, drought, intense rainfall and wind events.</p> <p>Update drainage and flood modelling to incorporate climate-change uplift and long-term hydrological shifts.</p> <p>Provide a transparent carbon accounting summary, including embodied carbon and lifecycle emissions.</p>	Medium

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	<p>including embodied carbon in panels, batteries, steel and concrete.</p> <p>Insufficient explanation of how the scheme will remain operationally resilient over a 40-year period in a changing climate.</p> <p>Decommissioning assumptions do not consider future climatic conditions, including increased storm events and hydrological shifts.</p>	<p>Demonstrate how infrastructure (especially the BESS) will remain safe and reliable under future temperature and humidity ranges.</p> <p>Provide a decommissioning strategy that accounts for future extreme weather conditions.</p>	
Cumulative Effects	<p>Assessment underestimates cumulative impacts from major local infrastructure including HS2, East West Rail, National Grid works and nearby solar/BESS schemes.</p> <p>Limited analysis of how combined effects on landscape character, PRoWs, tranquillity and visual amenity compound harm for local communities.</p> <p>Does not adequately consider combined ecological impacts on the Bernwood landscape, particularly for bats and hedgerow networks.</p>	<p>Assess cumulative effects fully given the size and scope of the Proposed Development, assess proportionately:</p> <ul style="list-style-type: none"> • landscape and visual receptors • PRoW amenity • human health and wellbeing • bats, hedgerows and woodland connectivity <p>Commit to additional mitigation where cumulative impacts remain significant, including layout refinement, strengthened planting, PRoW enhancements and noise controls.</p>	Low

