



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Buckinghamshire Council's comments on the Applicant's
Response to Deadline 2 Submissions**

Buckinghamshire Council

June 2026

Table 1: Buckinghamshire Council LIR Addendum

Ref	Page Reference	Summary Position	Applicants Response	Buckinghamshire Council Comments
4.1.3	6 and 7, para. 1.1.18	Application of Guidance Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not demonstrably apply IEMA/ISEP social impact assessment methodology.	The Applicant notes that the ISEP Guidance “Social Impact Assessment in EIA” was published in October 2025, after the DCO Application for the Proposed Development was submitted in September 2025 and therefore was not used as the basis for the population and health assessments undertaken at the point of application. As Annex A: Health Effects Report is effectively an extension of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4], the guidance was considered in this update when submitted at Deadline 1. It is the Applicant’s position that the assessment provided is in accordance with this guidance, noting that principally in terms of health effects the guidance points to the preceding ISEP guidance use for the production of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4] (including Annex A: Health Effects Report) (<i>Effective Scoping of Human Health in Environmental Impact Assessment (2022)</i>; and <i>Determining Significance for Human Health in Environmental Impact Assessment (2022)</i>). The ISEP Guidance “Social Impact Assessment in EIA” additionally refers to national wellbeing frameworks such as the Sustainable Wellbeing Framework, which accords with the approach taken in ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4] (including Annex A: Health Effects Report) to the definition of the wider determinants of health (Table 1). Notwithstanding this, the Applicant is content that the approach to population and health assessment is broadly in accordance with the Guidance, but more importantly (as this is only guidance) is in accordance with the requirements of legislation (the EIA Regulations), policy (NPS EN-1) and the approach agreed through the scoping process	Buckinghamshire Council acknowledges that the original ES pre-dated the publication of the ISEP SIA guidance. The Applicant asserts that the SIA guidance was considered in the Deadline 1 submission [REP1-056]. In reviewing the tracked changes within this update [REP1-057], the Council has been unable to isolate any updates that relate to the SIA guidance and would be grateful for further signposting from the Applicant of where this scope is already addressed, e.g. in relation to which determinant(s) of health that have been assessed and reported. The latest Rev 4 iteration [REP3-026] has been reviewed and the Council has not identified further edits in relation to this matter. Buckinghamshire Council notes that para. 5.6.2 [REP3-026] asserts in relation to mental health and well-being that the assessment is clear and transparent, which Buckinghamshire Council does not consider to be the case. Further, the Applicant indicates that significant environmental effects have been mitigated ‘where practicable’ but does not report which potentially significant effects it has not be practicable to mitigate, the assumption being that some may remain. Buckinghamshire Council would like clarification of what these effects are.

Ref	Page Reference	Summary Position	Applicants Response	Buckinghamshire Council Comments
4.1.4	6 and 7, para. 1.1.18 7, para. 1.1.19	Non-Technical Summary Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not afford health impacts equivalent prominence within the Environmental Statement. Comment noting that Buckinghamshire Council considers the Non-Technical Summary has not been updated to reflect the revised health assessment material, and should therefore be amended to clearly summarise health and wellbeing conclusions, including the significance of effects, to ensure consistent ES-wide reporting.	The Applicant considers that as an Appendix to the ES, the Health and Wellbeing Summary Statement and the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) are both certified documents that have according weight alongside other elements of the Environmental Statement including the ‘stand alone’ chapters. The approach taken is in accordance with ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079] and ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]. The Planning Inspectorate agreed that human health could be scoped out of the ES (ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080], p18) on the basis that the ES should still clearly set out potential impacts to human health from the Proposed Development and cross-reference where impacts are considered and assessed within other relevant chapters of the ES, with any relevant mitigation measures secured within the Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.4]. Consideration of health impacts is incorporated into e.g.: air quality, landscape & visual, noise & vibration, population, traffic & transport, land & groundwater, water and glint & glare topic chapters and assessments as appropriate, as well as ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]. The Applicant has considered whether it is beneficial to include a short statement in individual sections of the NTS (or a new stand-alone chapter of the NTS) but is generally of the view that the purpose of the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4] is to address the health implications of the assessments considered by the ES chapters, which have not changed. The individual NTS chapters for each topic therefore remain as produced to date.	Buckinghamshire Council respectfully disagrees with the Applicant that the presentation of the health and wellbeing effects as summary material in an Annex to an Appendix to a technical Chapter convey the perception of equivalent weight. The Health and Wellbeing Summary Statement Rev 4 [REP3-026] is presented by the Applicant as including reporting on the significance of residual effects of the Scheme on human health. Table 7 supplies the summary of residual effects. This includes a range of moderate adverse effects, some of which are deemed significant and others non-significant. The Council would welcome additional cross-referencing in this table to the presentation of the professional judgment that underpins these variations in significance when the magnitude of residual effect is moderate. Buckinghamshire Council would welcome further development of the concluding sections to include overall conclusion of significance from across all relevant health determinants. For example, there is no in-combination amenity assessment reported in Table 7, nor is community anxiety/mental health reflected in the summary. Buckinghamshire Council respectfully disputes the Applicant’s conclusions regarding the benefit of including the overall health assessment conclusions in the NTS. Noting that the NTS should summarise all of the significant residual effects (beneficial and adverse); coupled with the Applicant’s assertion that the health assessment reporting has equivalent weight to all other topic assessments, the Council’s position is that the significant effects on human health are included in [REP3-026] at Table 7 and therefore should be correctly summarised and included in the NTS.

Ref	Page Reference	Summary Position	Applicants Response	Buckinghamshire Council Comments
4.1.5	6 and 7, para. 1.1.18 8, para. 1.1.21 and 1.1.22	Geographically-defined High-Exposure Sub-Populations Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not consistently identify and assess vulnerable high-exposure sub-populations as distinct receptors. Specifically, the assessment does not provide sufficiently focused assessment for higher-exposure, more sensitive geographic sub-populations have been adequately assessed as distinct receptors, and therefore does not support the Applicant's conclusions, instead requiring further avoidance, targeted mitigation and additional assessment to reduce significant residual effects.	The approach taken in Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) is compliant with the IEMA (now ISEP) guidance on developing assessments for health and wellbeing effects. This includes a proportionate approach to identifying and considering the sensitivity of geographically defined higher exposure sub populations in the context of population scale effects on public health. It is acknowledged that those living closer to the source of environmental change related to the Proposed Development, and the location of effects, including changes to the visual amenity of PRoW and wider landscape change will experience more acutely the effects of the Proposed Development, as a result of their higher propensity to regularly experience a different visual environment in their homes and on affected PRoW which are more readily accessible than others (and alternatives that are not affected). While it would be disproportionate to identify specific individual homes and people by geography, it is also acknowledged that some people in the area are likely to be more sensitive/vulnerable to change as a result of their demographic and health characteristics, as described within the Health Effects Report. This may be related to age, disability, reported health or underlying health conditions (which in many cases may be related to age or disability). The Applicant has developed mitigation measures to address the 'worst case' scenario of effects, and applied thresholds and standards (for example in terms of noise effects) to reduce effects to a less than significant level where practicable, and this inherently includes a consideration of the potential for increased sensitivity to change. Mitigation is also flexible and provided in outline at the point of DCO Application, and is subject to detailed development which can include receptor-specific and geographically-specific measures and monitoring/remedial measures. In terms of specific receptors identified:	Noted. Buckinghamshire Council's position on this matter is unchanged. Buckinghamshire Council acknowledges the point that individual <i>conclusions</i> for individual receptors is not proportionate. However, the approach adopted by the Applicant includes clustering of receptor groups with generalised conclusions presented for some sub-populations (reported in Table 7 [REP3-026]). Buckinghamshire Council requests greater transparency of the professional judgements that have led to single collective assignment of sensitivity, impact magnitude, targeted mitigation and resultant effect for these clusters. Buckinghamshire Council has requested the underpinning evidence that has led to the sub-population conclusions and this point is applicable to both vulnerable sub-populations within the wider population; and the geographically defined higher exposure populations. Connections should also be made to community anxiety and other aspects within the scope of mental health and wellbeing (as per the ISEP SIA guidance). This transparency is, in Buckinghamshire Council's opinion, absent, leading to concern that significant effects may be missed/diluted and mitigation is not necessarily sufficient. Buckinghamshire Council also considers it would be beneficial for the Applicant to update the documentation to add the clarification points regarding mitigation in the response. For example, that there is an intention for the mitigation framework to enable further detailed development to include receptor-specific and geographically-specific measures and monitoring/remedial measures. In order to add weight to these statements, Buckinghamshire Council would wish to see appropriate wording within the REAC also.

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			a. Preston Farms/TCS Biosciences – As set out within Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086] – specifically Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farms – bespoke and responsive mitigation that will be flexible based on business requirements at the time has been developed through engagement with the receptor to acknowledge the individual characteristics and sensitivities of the operation, including bespoke approaches to management of noise, traffic, biosecurity and access for grazing animals. This mitigation is secured within the Outline CEMP [EN010158/APP/7.2.4] and Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.4]. b. Residential/Farm and discrete, localised ‘community’ receptors - The effects being referred to by Buckinghamshire Council relate to ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114] which concludes that <i>“only residents of dwellings at Bernwood Farm and Sion Hill Farm would experience significant visual effects during both years 1 and 10 of operation. The assessment concludes that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development”</i>. No other significant effects are reported for these individual receptors, and mitigation has been developed iteratively to reduce the potential for significant adverse effects through the application of the mitigation hierarchy and explained through the ES which evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Outline LEMP [EN010158/APP/7.6.3] [REP2-067].	

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			While residents in some locations may experience significant adverse landscape and visual effects, the Applicant stands by the conclusion in ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114] that the Proposed Development would not have an overbearing effect on the visual amenity experienced by residents of properties around the Proposed Development. Such effects are acknowledged to be individually experienced and subjective, which lends more weight to the lack of a possible conclusion on definitive health pathway effects. As stated above and in response to ExA Q1.13.2 in the Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087], guidance sets out that the assessment of health effects on individual receptors is not proportionate.	
4.1.6	8, para. 1.1.22	LVIA, PRow and Cumulative Effects Comment noting that Buckinghamshire Council remains unsatisfied that residual significant landscape-related effects, and cumulative wellbeing effects (reported in ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement) have been addressed.	The Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) clearly assesses the potential for determinants of health to arise from significant residual landscape and visual effects (at Section 7.3 of Annex A) and where intra-project and inter-project effects may result in result in cumulative wellbeing effects (Section 4 of ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) and Section 8 of the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]). <u>In terms of residual significant landscape effects:</u> The significance of health-specific effects, based on the approach as set out through ISEP (formerly IEMA) Guidance, and including the delivery of mitigation, the significance of the effect of landscape and visual amenity as a determinant on health is considered to be (in the context of the application of mitigation and the approach to assessment of significance set out above) moderate adverse with the <i>potential</i> to be significant.	Buckinghamshire Council has reviewed the updated rev 4 of the relevant document [REP3-026]. Buckinghamshire Council's position is unchanged. Please refer to response above (to point 4.1.5). With regards to the reporting of the cumulative effects, Buckinghamshire Council has reviewed the Applicants response but still has reservations regarding how the presentation of these effects have been addressed, in that all appropriate cumulative developments and their associated effects have been fully presented. The potential impacts that are expected to arise from the associated cumulative developments are a crucial area of concern for Buckinghamshire Council as the scale and nature of these proposed developments together with the Rosefield Solar Farm scheme will have detrimental impacts upon the landscape and visual receptors identified within the ES.

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			However, this is subjective and geographically limited to locations and areas experiencing significant effects, is likely to affect sensitive sub-populations more acutely, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRow), with some localised, significant but not overbearing effects on residential properties and their inhabitants. For clarity – the extent to which landscape and visual change, though significant and adverse, translates to health effects is subjective and geographically limited to locations and areas experiencing significant effects, is more likely to affect sensitive sub-populations, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRow), with some localised, significant but not overbearing effects on residential properties and their inhabitants. The determinant of health effects is generally built on the pathways that include assigning an effect on personal perception of the landscape and its mental health and wellbeing value being dependent on subjective interpretation of the landscape as a whole, and of individual views by an individual and collective set of receptors – change to the landscape may cause some people to experience stress or anxiety, if they are unable to access other areas of landscape quality, or if a change to their experience of the landscape means they are less inclined to undertake physical activity within it. As such, a significant effect on health is unlikely to occur at a population scale, but has been considered <i>potentially</i> significant (paragraph 7.3.29) in some cases given the application of ISEP criteria and in the context of community feedback, as reported in Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]. The ES evidences how design principles to limit impacts on individual residential properties and the landscape character of surrounding villages have been achieved as part of the design of the Proposed Development – for example through the Design Approach Document [EN010158/APP/5.8.2] [REP1-	

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			018] and Outline LEMP [EN010158/APP/7.6.3] [REP2-067]. As set out in previous submissions, following the implementation of embedded and additional mitigation, there are likely to be a mix of significant and non-significant effects on landscape and visual amenity, which are likely to translate into the potential for effects on physical and mental health and wellbeing, in some instances, and in the context that such pathways (i.e. people's interpretation of changes to the environment, and how this may or may not affect health and wellbeing and to what degree) are often individual and subjective. The Applicant has applied proportionality and used the mitigation hierarchy to deliver appropriate mitigation where practicable for these effects – this starts with identifying the embedded mitigation in the form of planting and landscape strategy that would be required across the Site to minimise effects on receptors where practicable, and the application of additional mitigation (e.g. in the form of long-term maintenance of such embedded mitigation is required to ensure its effectiveness). Mitigation relied upon is described at paragraph 7.3.17 of the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) and refers to, for example, ensuring that all existing hedgerows, trees and woodland would be retained and protected during construction (where not indicated for removal) – Outline CEMP [EN010158/APP/7.2.4] – and ensuring that existing and new hedgerows (once established) will be maintained at a minimum height of 3.5m for the duration of the operation phase of the Proposed Development (Outline LEMP [EN010158/APP/7.6.3] [REP2-067]). <u>In terms of intra-project cumulative effects on wellbeing:</u> A detailed assessment of intra-project cumulative effects is reported in the ES Volume	

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			2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3] [REP2-037] – No combined inter-topic significant effects have been identified as a result of the intra-project combined effects assessment. <u>In terms of inter-project cumulative effects:</u> Paragraph 8.3.7 – “<i>In summary, likely significant effects are predicted during the operational (including maintenance) phase of the Proposed Development, and hence the Applicant considers that inter-project cumulative effects related to this determinant of health have the potential to be significant (in the context of the already significant effects related to the Proposed Development.)</i>” For clarity – the extent to which landscape and visual change, though significant and adverse, translates to health effects is subjective and geographically limited to locations and areas experiencing significant effects, is more likely to affect sensitive sub-populations, and this relates to public views (on receptors where there is an alternative/substitute e.g. PRoW), with some localised, significant but not overbearing effects on residential properties and their inhabitants. The determinant of health effects is generally built on the pathways that include assigning an effect on personal perception of the landscape and its mental health and wellbeing value being dependent on subjective interpretation of the landscape as a whole, and of individual views by an individual and collective set of receptors – change to the landscape may cause some people to experience stress or anxiety, if they are unable to access other areas of landscape quality, or if a change to their experience of the landscape means they are less inclined to undertake physical activity within it. As such, a significant effect on health is unlikely to occur at a population scale, but has been considered <i>potentially</i> significant (paragraph 7.3.29) in some cases given the application of ISEP criteria and in the context of community feedback, as reported in Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4].	

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			The Applicant has taken proportionate and appropriate measures to address the potential for its contribution to these significant adverse cumulative effects through: a. Design principles to limit impacts on individual residential properties and the landscape character of surrounding villages– for example through the Design Approach Document [EN010158/APP/5.8.2] [REP1-018] and Outline LEMP [EN010158/APP/7.6.3] [REP2-067]; and b. Mitigation described at paragraph 7.3.17 of the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) which refers to, for example, ensuring that all existing hedgerows, trees and woodland would be retained and protected during construction (where not indicated for removal) – Outline CEMP [EN010158/APP/7.2.4] – and ensuring that existing and new hedgerows (once established) will be maintained at a minimum height of 3.5m for the duration of the operation phase of the Proposed Development (Outline LEMP [EN010158/APP/7.6.3] [REP2-067]). Additionally, the Applicant has produced an Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes Report [EN010158/APP/8.15] at Deadline 3 that builds on the assessment of cumulative effects and interrelationships presented in the ES by considering opportunities for interproject coordination to minimise cumulative effects and maximise delivery opportunities. As set out in ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4], and in accordance with ISEP guidance, the effective communication and engagement around effects, change and mitigation is important primary mitigation to potential effects on environmental change. To that end, the Commits the Applicant to consult with the Community Liaison Group (CLG) on relevant	

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			points of interest during the detailed design stage, prior to the submission and approval of the detailed design in accordance with Requirement 7 of the Draft DCO [EN010158/APP/3.1.5]. This could include, for example, the location and content of interpretation boards and waymarking signage and the options for planting alongside PRow and permissive paths, as appropriate.	
4.1.7	6 and 7, para. 1.1.18	Mitigation and Enhancements Comment noting that notwithstanding improvements, Buckinghamshire Council considers the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement and Annex A does not adequately progress suggested mitigation capable of reducing significant residual effects (including suggestions made by Preston Farms/TCS Biosciences).	The only potential wider determinants of health likely to influence public health identified by the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4]) relate to changes in landscape and visual amenity, which are localised, and subjective. The Applicant recognises that following the implementation of embedded and additional mitigation, there are likely to be a mix of significant and non-significant effects on landscape and visual amenity, which are likely to translate into the potential for effects on physical and mental health and wellbeing, in some instances, and in the context that such pathways are often individual and subjective. The Applicant has applied proportionality and used the mitigation hierarchy to deliver appropriate mitigation where practicable for these effects. As referenced by Buckinghamshire Council, the Applicant has included enhancements over and above that which is required for the specific mitigation of individual environmental effects. The Applicant's position on mitigation and effects identified by Preston Farms Ltd and TCS Biosciences Ltd has been set out within Table 5.5 of this document. The Outline LEMP [EN010158/APP/7.6.3] [REP2-067] and Outline RoWAS [EN010158/APP/7.8.4] secures important enhancement measures relevant to positive health pathways, including the provision of new permissive footpaths and increased accessibility, opportunities for recreation in the natural environment, and environmental improvements. The Applicant will provide a variety of biodiversity	Buckinghamshire Council has reviewed the updated rev 4 of the relevant document [REP3-026]. The edits that have been made by the Applicant do not relate to the comment raised regarding mitigation – no additional detail has been supplied to illustrate further development of targeted mitigation to address the concerns raised through the ISH process to date about adequacy or sufficiency of mitigation to address potentially significant effects. The Council's position on the need for further development of mitigation and inclusion of a clear and transparent presentation of how mitigation relates to specific impacts, is unchanged. Please refer also to response above (to point 4.1.5). This cites the Council view that there would be merit in the Applicant adding further mitigation intentions, as set out in its responses to 4.1.5. This should be supplied both within the Health effects summary [REP3-026] and the REAC.

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			benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; the sowing of grassland open fields; scrub and margins with wildflower; the planting of hedgerows and tree belts; the establishment of ecological ponds (either former ponds for recreation or new ponds as blue infrastructure works) and wider vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds. Further detail of these benefits are captured and secured within the Outline LEMP [EN010158/APP/7.6.3] [REP2-067]. The Proposed Development would deliver a Biodiversity Net Gain (BNG) in excess of 10%, as secured within the Outline LEMP [EN010158/APP/7.6.3] [REP2-067].	

Table 2: Buckinghamshire Council [REP2-089]

Ref	Page Reference	Summary Position	Applicants Response	Buckinghamshire Council Comments
6.1.1	2, row 2 5, row 1 7, row 1 13, row 1	Comment noting maintained concern with the broad drafting of Articles 40 and 41 in the draft DCO. Further comment that these articles are not tied to a clearly identified schedule of trees likely to be affected. Further comment that the powers in the draft DCO are not matched by a robust arboricultural evidence base or by an Outline Arboricultural Method Statement. Further comment that, in the absence of an Outline Arboricultural Method Statement, there is limited confidence in the arboricultural components of the other management plans.	Article 40 (Felling or lopping of trees and removal of hedgerows) and Article 41 (Trees subject to tree preservation orders) are based on model provisions which have been adopted in numerous made DCOs. The Applicant considers that the drafting is appropriately controlled, including by how Article 40 expressly links to Schedule 12 (Hedgerows to be removed) to the maximum extents shown on the Vegetation Removal Parameters (which is Appendix 3 of the Outline LEMP [EN010158/APP/7.6.3] [REP2-067]). Schedule 12 is divided into Part 1 (Removal of hedgerows) and Part 2 (Removal of important hedgerows). Article 40(4) clarifies that the power is to remove hedgerows specified in Schedule 12, to the extent set out in the Outline LEMP [EN010158/APP/7.6.3] [REP2-067] approved pursuant to Requirement 7 in Schedule 2. The Applicant acknowledges the importance of ensuring a robust and reliable arboricultural evidence baseline. All arboricultural features were ground-truthed, ensuring no reliance on aerial data alone. Where discrepancies arose between datasets (e.g. canopy extent or feature classification), these were resolved in favour of site-based observations. Any gaps in data were addressed through site verification and professional interpretation, ensuring a complete and coherent dataset. A detailed response on the approach to the arboricultural baseline and methodology is set out in the Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]. As detailed under Ref. 3.32 of the Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085] an Arboricultural Method Statement (AMS) will be prepared following detailed design, prior to any construction. The Outline CEMP [EN010158/APP/7.2.4] sets out measures to protect trees including a commitment that tree protection	The Applicant's response is noted. The Councils does not object to the tree-related powers in principle but maintains that their exercise should be clearly linked to the assessed tree and hedgerow impacts and to the AMS/CEMP/LEMP controls.

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			fencing will be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors.	
6.1.2	2, row 3	Comment noting that Buckinghamshire Council have requested the Applicant to consider Bernwood farmhouse in the cultural heritage assessment.	The Applicant notes that Bernwood Farmhouse has been recently requested to be considered within the assessment of effects on the historic environment. This will be included in an update to ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.2] [REP2-046] at Deadline 4.	Both the Council and the Applicant are submitting material relating to Bernwood Farmhouse for Deadline 4.
6.1.3	2, row 4	Comment noting updates to the biodiversity chapter with regard for arboricultural matters. Further comment noting a need for clearer arboricultural evidence and methodology, including confirmation of full ground verification, consistent treatment of woodland as woodland where appropriate, and a more robust, feature-specific approach to buffers, retained veteran trees and future veteran potential.	The arboricultural baseline was established through the integration of drone-derived topographical data and a ground-based arboricultural survey in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction as stated within paragraphs 3.1.1, 3.6.2 and Annex C of the ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044] . Trees have been recorded as individuals (prefix T) or as groups (prefix G) within the survey data tables within Annex A of ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044] in line with the BS 5837:2012 definition a group as: “ <i>trees that form cohesive arboricultural features either aerodynamically (e.g. shelter), visually (e.g. avenues or screens) or culturally including for biodiversity (e.g. woodlands, parkland or wood pasture)</i> ”. Tree group descriptions and classifications are provided in Annex A, for example G70 – woodland belt, G71–G72 – woodland, G79 – woodland and G86 – woodland, and so on. These examples demonstrate that groups have been consistently identified and described within the AIA in accordance with standard arboricultural practice. Section 3.3 of the AIA further describes the methodology of tree groups. Appendix 3 of the Outline LEMP [EN010158/APP/7.6.3] [REP2-067] sets out minimum buffer distances from edges of existing woodlands including groups, using National Forest	The Applicant’s explanation is noted and helpful. The Council would still welcome clear cross-referencing between arboricultural features, applied buffers and the relevant AIA/AMS/LEMP controls.

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			Inventory 2021 data. These buffers are applied to the associated woodland features regardless of BS5837 prefixes. The buffer strategy is feature-specific and evidence-based, informed by individual tree constraints (including Root Protection Areas (RPAs) and canopy spreads) and the presence of higher-value features. Veteran and potential veteran trees have been identified with veteran trees afforded enhanced protection, with buffers applied in line with relevant standing advice.	
6.1.5	3, row 3 6, row 1 13, row 1	Comment noting that cumulative arboricultural effects, particularly with regard for ancient woodland and woodland edge pressure, is not sufficiently resolved. Further comment noting the overlap with HS2 mitigation on land adjacent to Decoypond Wood which suggests a double use of the land.	ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.2] [REP1-044] fully assesses the potential for intra cumulative impacts to occur from the Proposed Development and for inter cumulative from other developments including High Speed 2 (HS2) and East West rail in combination with the Proposed Development. Where the assessment has highlighted that there is the potential for cumulative effects, this has been flagged. It is acknowledged that there has been significant construction activity and disruption caused by large numbers of contractors, vehicles and plant movement as well as unprecedented habitat change due to HS2 for several years. The Applicant is aware that some parcels of the land within the Order Limits are covered by The Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate,	The Applicant's explanation is noted. The matter is not fully resolved until formal HS2 confirmation is provided and the relationship between HS2 mitigation, replacement mitigation land and the Applicant's own buffer / mitigation framework is clearly evidenced.

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			which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which the Applicant would submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.3] [REP2-067].	
6.1.6	4, row 3	Comment noting Buckinghamshire Council is not satisfied with the Applicant's assessment of human health. Further comment noting these concerns are raised in Buckinghamshire Council's Local Impact Report Addendum. Further comment that the human health effects have not been added to align in the Non Technical Summary.	The Applicant has provided a response to Buckinghamshire Council's prevailing concerns relating to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4] in Part 1 of this submission. ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.4] has been updated at Deadline 1 [REP1-056] (to include the Health Effects Report as Annex A) and then at Deadline 2 [REP2-050] (to include information provided by Waddesdon Surgery to make more explicit the sensitivity of sub-populations).	Buckinghamshire Council has reviewed the updated rev 4 of the relevant document [REP3-026] . Buckinghamshire Council's position is unchanged, insofar as significant effects are noted in Table 7 and should be included in the NTS. Please refer to response above (to point 4.1.4).
6.1.7	4, row 5 7, row 1 5, row 1	Comment noting concern that the DCO Application does not detail when the proposed site fence, as referenced in the Arboricultural Impact Assessment, would be erected. Further comment noting that this fence is referenced as a tree protection measure but its ability to serve as such depends on when it is installed. Further comment noting proximity of proposed works to a group of black poplar to which Buckinghamshire Council consider the Applicant's assertion that these trees would remain unaffected by the Proposed Development requires a detailed Outline Arboricultural Method Statement to conclude this.	The Outline CEMP [EN010158/APP/7.2.4] sets out measures to protect trees including a commitment that tree protection fencing will be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors. An indicative tree protection fence alignment is shown as a purple polyline on the plan at Annex 5 of the Outline CEMP [EN010158/APP/7.2.4] and commits to it being installed before any site mobilisation works such as installation of Site offices or any ground works and before any construction begins including Site fencing. This is secured by Requirement 11 in the Draft DCO [EN010158/APP/3.1.5].	The clarification on tree protection fencing timing is welcomed. From an arboricultural perspective, the Council is content, on the understanding that any perimeter / site-security fencing (which is marked yellow on the Annex 5 of the Arboricultural Impact Assessment [EN10158/APP/6.4.2]) relied upon as tree protection is installed before works capable of affecting retained arboricultural features. The Council notes that final alignment and the protection of G98 still depend on detailed design and should be clearly secured through the AMS/associated control documents.

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			This alignment of tree protection fencing will need to be reassessed during the detailed design stage to reflect any new changes in layout, provide linear measurements, and ensure trees can be protected adequately. There is therefore no period during which retained features would be unprotected. The timing and specification of both temporary and permanent fencing will be secured and clearly defined within the site-specific Arboricultural Method Statement and associated control documents at detailed design stage. Group G98, which is the only group suspected to be black poplar, will remain unaffected by works and will be fenced to beyond its projected RPA. The Solar PV modules and boundary fencing would be realigned at the detailed design stage to ensure the two trees within the group can remain unaffected by works as they will be fenced beyond its projected RPA. This is also detailed in, and secured by, the Outline CEMP [EN010158/APP/7.2.4] and Requirement 11 in the Draft DCO [EN010158/APP/3.1.5]. The Applicant considers that this mechanism is sufficient for ensuring the appropriate protection of Group G98 and does not agree that an additional Outline Arboricultural Method Statement is necessary.	
6.1.8	5, row 1 6, row 1	Comment noting the Applicant's general deferment of detailed arboricultural matters to the detailed design stage means that confidence in assessments to date are undermined. Further comment noting ongoing concern with the robustness of the Applicant's arboricultural baseline.	The Applicant has considered arboricultural matters throughout the design process and has secured mitigation measures in the Design Commitments [EN010158/APP/5.9.5] and Outline CEMP [EN010158/APP/7.2.4] to avoid and reduce impacts to trees, which is a standard approach to the assessment. These include the below measures: • Design Commitment C7: Principal components of the Proposed Development will avoid root protection areas of trees and hedgerows as far as reasonably practicable, except where a hedgerow crossing is required for access tracks and/or cable routes. • A site-specific Arboricultural Method Statement (AMS) will be compiled, detailing the exact location and nature of protective fencing, tree pruning, signage, timings and methods of works and other protection	The Applicant's response is noted. The control framework is clearer, but the Council maintains that sensitive interfaces with retained trees, RPAs, hedgerows and woodland edges should be clearly addressed through the AMS / CEMP process.

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			measures. All site operatives must be made aware of the nature of the protection detailed in the AMS and it will remain in place throughout construction. - It is proposed that tree protection fencing be installed around retained trees and groups of trees where they are in close proximity to areas of active construction such as new highway junctions, internal access routes, construction of the Rosefield Substation, Main Collector Compound, BESS and cable corridors. - A indicative tree protection fence alignment is shown as a purple polyline on the plan at Annex 5 and must be installed before any site mobilisation works such as installation of site offices or any ground works and before any construction begins. This alignment of tree protection fencing will need to be reassessed during the detailed design stage to reflect any new changes in layout, provide linear measurements, and ensure trees can be protected adequately. - Group G98, suspected to be black poplar, will remain unaffected by works and will be fenced to beyond its projected RPA. These measures outlined in the Design Commitments [EN010158/APP/5.9.5] and Outline CEMP [EN010158/APP/7.2.4] are adequately secured through the Draft DCO [EN010158/APP/3.1.5]. The Applicant will engage with Buckinghamshire Council at the detailed design stage and will submit the detailed Construction Environmental Management Plan to them for approval. The Applicant respectfully disagrees with the comment on the robustness of the arboricultural baseline. All arboricultural features were ground-truthed, ensuring no reliance on aerial data alone. Where discrepancies arose between datasets (e.g. canopy extent or feature classification), these were resolved in favour of site-based observations. Any gaps in data were addressed through site verification and professional interpretation, ensuring a complete and coherent dataset. A detailed response on the	

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			approach to the arboricultural baseline and methodology is set out in the Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087], see Q1.7.23.	
6.1.9	12, row 2	Comment requesting that the outline CTMP is reviewed against the Arboricultural Impact Assessment to ensure the full assessment of highway, verge, passing place, widening and access works with potential to affect trees is consistent. Further comment stating that there is uncertainty as to whether all tree, hedgerow and woodland-edge effects associated with traffic management and highway works have been fully identified and assessed from the outset.	ES Volume 4, Appendix 7.13: Arboricultural Impact Assessment [EN010158/APP/6.4.2] [REP2-044] was updated at Deadline 2 to ensure consistency with the trees, hedgerows and woodland edge effects associated with traffic management and highway works outlined in the Outline CTMP [EN010158/APP/7.5.3] [REP2-065] . Further detail on specific changes has also been provided within the Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085] .	The Applicant's confirmation that the AIA has been updated to reflect highway and traffic management is welcomed. No further comments are made at this stage.
6.1.10	12, row 3 13, row 1	Comment noting that the outline LEMP's detailing of arboricultural matters does not do away with the need for an Outline Arboricultural Method Statement. Further comment that arboricultural elements of the outline LEMP require a supporting Outline Arboricultural Method Statement to properly secure appropriate measures. Further comment noting benefits of including an Outline Arboricultural Method Statement to support the Proposed Development.	As set out at response reference 3.32 of the Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085] , an Arboricultural Method Statement (AMS) will be prepared following detailed design, prior to any construction works as set out and secured in Paragraph 1.1.13 and Table 3.2 of the Outline CEMP [EN010158/APP/7.2.4] and by Requirement 11 of the Draft DCO [EN010158/APP/3.1.5] . At this stage, the preparation of an outline AMS would not add material value, as the final layout, construction methodologies, and working areas are not yet fixed. An outline document would therefore be necessarily high-level and largely reiterate the embedded mitigation measures already secured, without providing meaningful additional detail. The approach taken securing a detailed, site-specific AMS post-detailed design is standard practice and ensures that the final document is accurate, effective, and tailored to the confirmed construction parameters. The AMS will set out detailed measures to protect trees and will define how impacts on trees, hedgerows and woodland are to be avoided, minimised and managed during construction, including specific methodologies for access routes, temporary construction compounds and works in proximity to retained features. These would be substantially in accordance with the measures that are already set out within Table 3.2 of the Outline	The Applicant's response is noted. The Council maintains that outline-stage arboricultural method clarity would still provide important assurances, particularly for potential RPA impacts, fencing, drainage interfaces, highway/access works and works near retained features.

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			CEMP [EN010158/APP/7.2.4] and secured within the Design Commitments [EN010158/APP/5.9.5]. This includes defined protective measures such as tree protection fencing, no-construction zones, controlled working methods, and appropriate timing of operations to safeguard retained trees and their Root Protection Areas. Where required, minor pruning or vegetation clearance will be undertaken in advance by a qualified arborist in accordance with BS 3998:2010, ensuring that works are proportionate and appropriately managed. All site personnel will receive site-specific inductions on tree protection, supported by strict procedures to prevent soil compaction, contamination, and accidental damage, including controls on storage, drainage, and spill management in proximity to retained trees.	
6.1.12	14, row 3	Comment disagrees with the Applicant in that the revised footpath diversion for the deleted and created network north west of Pond Farm in Parcel 1 is not considered the best layout possible. Further comment noting that the alignments do not reflect the desire lines proposed by Buckinghamshire Council in November 2025. Comment noting difficulty in interpreting the pink and turquoise lines on sheet 1 of the Streets, Rights of Way and Access Plans.	The Applicant considers that there is benefit in the proposed arrangement for those undertaking circular walks from Steeple Claydon, providing a link between footpath MCL/21/1 north of Calvert Road and the new footway created by HS2 along Addison Road. It has been agreed with Buckinghamshire Council to update the Design Commitments [EN010158/APP/5.9.5], to include a design commitment that the diverted PRoW in Field B5 (SCL/12/2 and SCL/13/1) will not be fenced during operation (including maintenance), to address their concerns on this matter. In relation to the interpretation of the pink and turquoise lines on sheet 1 of the Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3] [REP1-006], the pink lines indicate where works may occur along roads and/or PRoW during the construction phase and would not be included on the definitive map. The turquoise lines are those anticipated to be included on the definitive map. Paragraph 8 in Section 3 of the Draft DCO [EN010158/APP/3.1.5] explains what 'Street Works' cover and Schedule 4 of the Draft DCO [EN010158/APP/3.1.5] provides a list of the 'streets' anticipated to be subject to 'Street Works', along with a description of the anticipated extent of works.	The Council considers both of these matters now to be resolved.

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

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			bat monitoring strategy with an acknowledgement of the limitations of acoustic data and that the final monitoring strategy is likely to be in partnership with organisations such as HS2 using monitoring techniques other than just acoustic detectors. Accordingly, the Applicant considers that the Bat Technical Study [EN010158/APP/8.5] [REP1-105] is sufficiently robust to inform consideration of the DCO Application.	